
Case Number	20/01301/OUT (Formerly PP-08608386)
Application Type	Outline Planning Application
Proposal	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)
Location	Hepworth Properties Ltd East Works Storrs Bridge Lane Sheffield S6 6SX
Date Received	23/04/2020
Team	West and North
Applicant/Agent	Avison Young
Recommendation	Refuse

Refuse for the following reason(s):

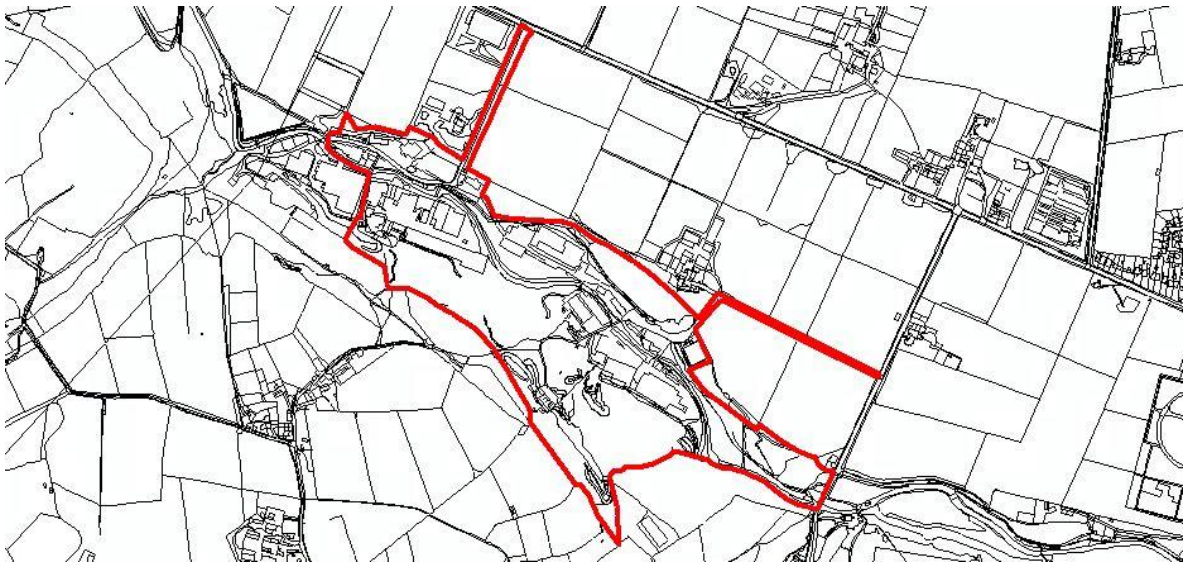
- 1 The Local Planning Authority considers that the application is contrary to Policies GE1, GE2, GE4 and GE5 of the Sheffield Unitary Development Plan; Policy CS71 of the Core Strategy and Paragraph 145g of the National Planning Policy Framework. The proposal would have a greater impact on the openness of the Green Belt than the existing development, by virtue of some of the existing development having blended into the landscape. The spatial and visual impact of the proposal would be harmful to the openness of the Green Belt and the special character of the Loxley Valley.
- 2 The Local Planning Authority considers that the proposal amounts to an unsustainable form of development, as set out in Paragraph 8 of the National Planning Policy Framework, due to the lack of available local services integrated into the development and inaccessibility to local services due to the nature, location and topography of the site and its surroundings.

- 3 The Local Planning Authority considers that the application has failed to pass the Exception Test for flooding, contrary to Paragraph 160 of the National Planning Policy Framework as it has not been demonstrated that the development would provide wider sustainability benefits to the community that outweigh the flood risk in this case.
- 4 Insufficient information has been submitted to enable a full and detailed assessment of the impact of the development on the natural and built environment in respect of biodiversity, landscaping, climate change, design quality, visual impact, pollution, remediation and mitigation of derelict and contaminated land. The Local Planning Authority must therefore conclude that the proposed development is contrary to Core Strategy Policies CS63, CS64 and CS65 (Climate change and renewable energy), CS71 (Green Belt), CS73 (Strategic Green Network), CS74 (Design Principles); Saved Unitary Development Plan Policies GE2, GE3 GE4 (Green Belt), GE8 (Area of High Landscape Value, GE10 (Green Network), GE11 (Nature Conservation) GE12 (Nature Reserves) GE13 (Local Nature Sites), GE15 (Trees and Woodland) GE17 (Rivers and Streams) GE19 (Water Resources), GE20 (Flood Defence) GE22 (Pollution), GE25 (Contaminated Land), GE26 (Water Quality); and Chapters 8, 12, 13, 14 and 15 of the National Planning Policy Framework.

Attention is Drawn to the Following Directives:

1. The applicant is advised that this application has been refused for the reasons stated above and taking the following plans into account:
 - 1124-urbed-z0-00-dr-u-01-parameter plan - red and blue line boundary (Location Plan)
 - 1124-urbed-z0-00-dr-u-02-parameter plan - demolition and retained structures
 - 1124-urbed-z0-00-dr-u-03-parameter plan - land use plan
 - 1124-urbed-z0-00-dr-u-04-parameter plan - building heights
 - 1124-urbed-z0-00-dr-u-05 - illustrative masterplan
 - 1124-urbed-z0-00-dr-u-06 - existing buildings and proposed layout
 - 1124-urbed-z0-00-dr-u-07 - existing hardstanding areas and proposed layout
2. Despite the Local Planning Authority wishing to work with the applicant in a positive and proactive manner, this application was submitted without the applicant having entered into meaningful pre-application discussions about the planning policy (or policies) that apply to the proposal, the application shows such disregard for policy requirement(s) and lacks the detailed information required to assess proposals relating to such a sensitive Green Belt site, that the Local Planning Authority had no alternative but to recommend refusal of the application. We would welcome pre-application discussions on an alternative scheme.

Site Location



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BACKGROUND

The application is supported by an Environmental Statement based on the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the '2017 Regulations'). The application was screened by the applicant in line with the Regulations which concluded that a statutory EIA was required based on the scale of the proposals and the likelihood of the significant environmental impacts.

The Local Planning Authority (LPA) has notified the Secretary of State for Housing, Communities and Local Government of the application and, for clarity, no request has been made to call in the application, a right which can be exercised up to any point at which the LPA makes a formal decision on the application.

The application is in outline with all matters reserved other than the demolition of some buildings, together with their change of use and the means of access. The application is accompanied by parameter plans and supporting technical reports and surveys.

The Environmental Statement (under the EIA Regulations) includes various technical disciplines and assessments, which have been 'scoped in' and include the following chapters:

Landscape and Visual;
Ecology and Nature Conservation;
Ground Conditions;
Drainage and Flood Risk;
Transport and Access;
Air Quality and Dust;
Socio Economic;
Health; and
Archaeology and Heritage

Matters 'scoped out' include:

Noise;
Lighting;
Waste;
Daylight, Sunlight and Overshadowing;
Wind;
Accident and Disasters

These matters have been scoped out because the applicant considered them to be 'non-significant' (i.e. of local importance only) and they take the view that the usual planning considerations would take account of these elements in any event. Your officers agree with this view.

LOCATION AND PROPOSAL

Location

The application site is the former Hepworth Refractory site, situated in the Loxley Valley. The site is approximately 3.5 miles north-west of Sheffield, located to the south of Loxley Road (B6077) and sits to the west of Loxley and Stannington.

The site is around 26.9 hectares of land with access from both Storrs Bridge Lane to the west of the site and Rowell Lane to the east via a farm track.

The site extends to the west from the Upper Don at Hillsborough with the Damflask reservoir and the village of Bradfield to the east.

The River Loxley runs through the site and flows north- west to south-east, with the site being situated across Flood Zones 1, 2 and 3.

The site borders Old Wheel Farm and fields to the north; woodland to the east and south; and Yorkshire Water (Loxley) Treatment Plant and mill pond are situated to the west.

The site consists of a variety of disused buildings and hard standings associated with the former Hepworth Claypit Factory site which ceased use around 1990. Across the site are a number of public rights of way, un-adopted roads and a bridge. There is a terrace of 5 dwellings and existing commercial uses to the eastern part of the site.

Proposal

The application seeks outline planning permission for the construction of up to 300 dwellings. Detailed means of access and use of retained buildings is put forward for approval at this stage.

Matters such as appearance, landscaping, layout and scale are all reserved for subsequent approval.

The application is accompanied by a Design and Access Statement and indicative parameter plans which include, building heights, hard standing areas, demolition and retained structures, land use and parking, together with an illustrative master plan.

The primary access point is proposed via Storrs Bridge Lane with a secondary 'public transport' route via the farm track onto Rowell Lane.

The existing bowling green is shown for retention, together with the 5 terraced properties and three other buildings that the applicant has deemed as buildings of potential merit. 21 other buildings are shown for demolition; the majority having been identified as being in poor condition and no longer in use.

The Illustrative Masterplan identifies the following:

- access points, potential bus routes;
- 300 new homes of mixed accommodation;
- flexible mix of uses for retained buildings with potential to include 417m² of community homeworking hub, 800m² for potential cycle, café/restaurant hire, GP surgery and workshop units, totalling around 1217m²;

- Parking for around 552 cars, 97 visitor spaces and commercial parking;
- Around 14.9 hectares of retained woodland and enhanced woodland;
- 1.474 hectares of public open space in the form of a new village green, village squares, riverside and millpond public realm.

The Illustrative Masterplan sets out an indicative layout which potentially could include urban design principles, such as access, street hierarchy, bridges, green and blue infrastructure, refuse and waste, lighting, parking, character areas.

PLANNING HISTORY

There is no recent relevant planning history in relation to the site.

SUMMARY OF REPRESENTATIONS

The application has been advertised by site notices, neighbour notifications and press advert in accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2015 and the Council's Statement of Community Involvement.

Statement of Community Involvement

The Council's Statement of Community Involvement (SCI) encourages applicants to undertake pre-application consultations with the community. The application is accompanied by a SCI which states that the applicant has undertaken community consultation in line with the Localism Act 2011 and Sheffield City Council's SCI.

The activity is summarised as:

- Letters to Ward Members, Cabinet Members, Parish Council's and MP's;
- Distribution of leaflets to 2,589 nearby households;
- Consultation website;
- Use of social media;
- Community information telephone line and email address;
- Press release to local media;
- Workshop with key stakeholders;
- Publication Exhibition Events.

The outcomes set out in the report are:

- That the applicant has met the requirements in terms of undertaking pre-application public consultation;
- The consultation attracted a large number of responses representing a wide range of views on the proposals;
- A total of 93 respondents used the public consultation to register an interest;
- Feedback included topics such as: effects on local infrastructure such as highways and local services, flood risk and ecology.

Local Planning Authority Consultation

The Council has undertaken two rounds of consultation. The first round included posting site notices around the site and also at key local facilities to ensure that interested parties were made aware of the application during the COVID19 lockdown period; press advertisements and direct neighbour notification. A further round of consultation was undertaken due to a technical error in the first round (which did not calculate the correct dates for EIA development, meaning that site notices had the incorrect date for comments to be received by). EIA development requires 28 days notification rather than the usual 21 days.

In excess of 900 representations in OBJECTION to the scheme have been received, which can be summarised as follows:

Traffic	Malin Bridge Hillsborough Traffic surveys flawed
Local Facilities	Impact on School Places Pressure on local facilities Walking distance assessments flawed as they don't take account of local topography, isolated secluded routes not ideal for school children. Lack of pavements/street lighting, absence of alternatives in terms of inclement weather
Landscape	Loss of trees along Storrs Bridge Lane
Ecology/Wildlife	Impact on birds, flowers and trees Artificial lighting will have damaging effect on wildlife during construction and occupation Impacts of noise, vibration and dust on natural habitats outside the site. Inaccurate ecology assessment. Impact of new infrastructure required outside of the site.
Public Transport	Previous bus service was not used No provision for bus shelters
Noise pollution	As a result of increased traffic
Air pollution	As a result of increased traffic
Light pollution	As a result of increased traffic Natural light will be poor due to the steep wooded valley
Flooding & Drainage	Installation of drainage systems will impact on watercourses and nature.
Cycling	Unsafe roads and topography unattractive
Design	No uniqueness to design proposal such as passiv-haus. Type and scale of the development is wholly inappropriate
Well being	The impact on outdoor space has a positive impact on mental wellbeing; the space should be used for current residents to enjoy outdoor pursuits.
Affordable Housing	Isolated desirable location suggests affordable homes are likely to be ruled out.

Local Councillors and MP's

Gill Furniss MP	Impact on neighbouring constituency of Wisewood, Hillsborough, parts
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Olivia Blake MP	of Loxley and Malin Bridge. Harmful to public amenity. Impact on distant views. Affordable housing minimal. Flooding. Sustainability Impact on school places and walkable distances to schools. Traffic volumes affecting the Hillsborough area and Malin Bridge. Impact on Air Quality due to additional traffic. Lack of detail in relation to proposed bus service and travel plan.
Stannington Ward Cllr D Baker Cllr V Priestley Cllr P Baker	Object Over-development – size and scale Impact on Green Belt Over- bearing pressure on local infrastructure Impact on school places, medical facilities and public transport Additional traffic generation Impact on road local networks – Malin Bridge

Sheffield Green Party

Application type/Process	Object to the use of an outline application a full application is the appropriate route. Collaborative solution outside of planning system required
Green Belt	Non conforming Green Belt site
Flooding	Classified as high risk of flooding. November floods and in 2007 parts of the site were under several feet of flood water
Contamination	Cost of site clean up would result in limited affordable housing provision.
Access to local facilities	Car dependent Active travel limited Remote location Via narrow bridge, steep zig zag and pavement free access to Stannington
Highways	Increased vehicles on Loxley road to Malin Bridge
Climate emergency	City must be future proofed over the next decade

Friends of Loxley Valley

Community Engagement	Poorly designed in terms of timing, difficult to find the venue and poorly accessed by public transport. Many households around Loxley did not receive a leaflet. A Full application was recommended by the Council to demonstrate a development of award winning status if a sustainable outcome could have been found.
Landscape	Concerns with regards to the future character of the unique landscape. Loss of mature trees.
Flood Risk	Should not be building on flood plains due to severe weather events driven by climate change.

Outline application	The considerations of the site are so specific they cannot reasonably be determined through an outline application.
Housing Need and Affordable Housing	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. There is no guarantee that the final development will include affordable housing.
Green Infrastructure	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.
Wildlife	Impact on natural environment and wildlife. Not demonstrated biodiversity net gain.
Transport	Increased traffic. Car dependent. Inadequate public transport. Impact on congestion and air quality. Safety issues for cyclists. Tension between walkers, horse riders and cyclists.
Local Facilities	Remote location and lack of suitable infrastructure.
Air Quality	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.
Climate Change	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. 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.
Summary	Structured dialogue required to find a solution for the site and award-winning merit considering use of structures, lower impact on wildlife and the woodland setting. This application is not 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.

General	The proposal has some limited but marginal merits which might attract support if they were part of a more imaginative, consensual and visionary solution for this unique site. It will be a new township without a heart, dwarfing the existing Loxley valley settlements of Dungworth, Storrs, Holdworth, Stacey Bank, Low and High Bradfield, Load Brook and Ughill.
Sustainability	The proposal is an unsustainable development that moves residential development into the Green Belt.
Local Facilities	Site is remote with a lack of facilities. Poor access to local facilities such as local shopping centre and schools.
Carbon footprint	Vehicle journeys will raise the city's carbon footprint.
Transport	Car dependent. Proposed bus service would not expect significant take up or be viable long term.
Flood Risk	The flood plain is not suitable for housing when there is adequate supply of dry sites in the city.
Green Belt	Introduction of lighting will be visible from surrounding hillside communities.
Naturalisation	The site hosts a thriving ecological system within and around buildings which will be impacted upon.

Hallamshire Historic Buildings Society

Assessment	The heritage assessment is lengthy but deficient. The application is not fit for determination and a proper assessment of the mining and watercourse assets are needed.
Heritage Assets	Although there are no designated heritage assets there are non-designated assets of historic interest in which the NPPF states should be conserved in a manner appropriate to their significance. Mines and tramway remain barely mentioned. Waterways - no recent analysis or survey. Archaeology and Heritage Chapter of the ES fails to account for and assess the impact on all buildings.
Conditions suggested	Conditions suggested once the defects are rectified. Heritage significance of mines and tramway remains to be assessed and proposals for their conservation be included in the final masterplan. Play area to be re-sited to avoid conflict with heritage assets. Heritage significance to all waterways and former dams to be reassessed and their conservation included in the final masterplan. All structures relating to waterpower infrastructure to be reassessed and their conservation included in the final masterplan. Expose and interpret below ground features relating to the site's industrial history. The bridge (C6) to be restored and retained. Chimney (E5) to be retained.

Grenoside Conservation Society

Infrastructure	The proposal will put a huge strain on local infrastructure.
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Affordable Housing	Due to the desirable location and cost of housing the likelihood of affordable housing is limited.
Local Facilities	Local schools and GP facilities are already over stretched.
Nature	The site has been derelict for many years and now re-claimed by nature.
General	The site should be recognised as an asset by the Council as an educational tool due to its history and should be cleaned up and managed by the Council or an environmental group.

Sheffield Climate Alliance

Climate emergency	Sheffield Council declared a climate emergency in January 2019 and the application does not inspire confidence that it will fit in with that aim.
Reduction in greenhouse gas emissions	Not clear and consistent in how this will be achieved.
Carbon emissions	The submitted documents fail to consider carbon emissions or mitigation measures
Climate mitigation	The submitted documents fail to consider climate mitigation measures.
Sustainable building techniques and zero carbon housing	The NPPF requirement for future proofing development is particularly relevant as the housing envisaged by this development will be in use beyond 2025.
Climate change	No consideration of climate change in the scope of the EIA.
Air Quality	No consideration of carbon emissions in relation to heating and energy.
Local Facilities	Lack of local facilities will increase the need to travel by car and subsequently more implications for vehicle emissions.
Waste	In adequate details for waste collection and storage of recyclable waste.
General	The application does not give any assurance that the development will mitigate climate changes primarily on the grounds of the document associated with the application.

Peak District National Park (PDNP)

Pre-application Engagement	Disappointed that constructive engagement with the PDNP has not been undertaken. The SCI is incorrect which raises concerns. The Council has not engaged with the PDNP in terms of a duty to involve the PDNP in decisions that may affect the National Park.
Outline Application	Documents provide illustrations of the proposed scheme and layout however these are illustrative which is unacceptable for a significant development in the Green Belt. The fact that everything except the access arrangements are proposed to be reserved matters offers us no confidence that this will be the outcome of re development of this site.
Further Engagement	The PDNP encourages the Council to work with stakeholders for the best outcome of the Green Belt and the valley as a whole.
Landscape	The Peak District Landscape Strategy has not been recognised in the submission. Whilst it has no statutory status

	in decision making outside of the National Park it offers commentary on valued landscape character, how to protect, manage and plan particular characteristics of each landscape type
Woodland	The impact on woodland is uncertain.
Traffic and Travel	The Traffic assessment and travel plan have not considered the impact on the National park. Given the pressure that already exists in relation to public transport on fringe areas and communities just inside the National Park, we would expect to see that addressed satisfactorily before any permission is granted.
Carbon Footprint	Will do little to reduce carbon footprint. Impact on air quality and public health. Exemplar practice in low carbon living should be demonstrated to offset the traffic and travel implications.
Brownfield Land	Welcome the use of previously developed land ahead of greenfield land release. Do not agree that the supply of alternative brownfield land is insufficient to meet need.
Biodiversity	The PDNP authority urges the Council to require the developer to work with such organisations as SRWT to ensure this development provides net gains for biodiversity and aids nature recovery in this area. Unconvinced of the evidence provided by the developer on impact of the proposed development on biodiversity.

CPRE - South Yorkshire

Green Belt	Contrary to Green Belt policy Harms openness Visually intrusive Extends beyond built areas Encroaches on countryside
Openness	Openness adversely impacted from views outside the site and the wider setting. Significant public views with the site on public rights of way. Fails to take account of or assess.
Affordable Housing	Not sufficient to be material as to allow and exception to Green Belt policy. Does not specifically target a local affordable housing need.
Sustainable Development	The site is remote and isolated from the necessary services and infrastructure. Not well served by public transport or viable for walking or cycling trips. Public transport proposals are flawed.
Design	Unacceptable as Design and Access Statement and Design Code fixes nothing beyond the parameter plans and as such the outline application cannot be properly assessed.
Biodiversity	Contrary to local and national nature conservation and biodiversity policies. Will urbanise the site and be out of character with the quiet and biodiversity rich rural character that now exists.

South Yorkshire Wildlife Trust

Outline application	The application is not sufficiently detailed and a Reserved Matters application would not include further public involvement.
Local Wildlife Site and Woodland	Concerned about the river corridor and the assessments don't satisfy policy and best practice in terms of the woodland.
Biodiversity Net Gain	This has not been measured as part of the application submission.
Protected species	Concerned that survey efforts, mitigation and enhancement for birds is inadequate. The site is important for bats and the survey and mitigation is inadequate.
The Setting	Concerns that the PDNP have not been consulted, the land is not allocated, for a major development in the Green Belt on the edge of the PDNP.
Sustainability of the development	This is not yet a proposal for an exceptional sustainable development given its Green Belt location.
Flood Risk	Flood Zones 2 and 3 are not optimum areas for building and better suited to natural habitats and natural flood management solutions.
Engagement and consultation	Comments at the consultation have not taken on board concerns raised.

Rivelin Valley Conservation Group

Sustainability	Impact on local road network especially Malin Bridge and Hillsborough. Impact on public transport provision.
Environment	Impact on: Nature Conservation Landscape Character Appearance of Loxley Valley Flooding

In excess of 200 letters of representations in support of the proposal have been submitted and can be summarised as follows:

Business	Local businesses will benefit from more people coming to the areas. Source of employment for local builders
Re-use of site	The renovation of old sites is beneficial to local areas rather than creating new ones. The site is an eyesore and dangerous in its current state. Will improve the area. Would love to live here. Sustainable housing project on the brownfield land would be a good solution. New residents will support local businesses, sports clubs and charitable organisations. Clean up the contaminated land.
Wildlife	Encourage and preserve wildlife, creates new habitat and manages the woodland. Only 30% of the site will be built on allowing for 70% of the land to be made wildlife friendly.
Management	The proposal represents a good opportunity to manage the

	site correctly for the benefit of the whole community.
Public Transport	The offer of public transport helps the traffic issues. Public transport to be improved with bus service.
Traffic	The office hub helps to alleviate traffic issues. Introducing bike trails, public transport and potential schemes can reduce the impact of increased traffic.
Recreation	Supporting the cricket club and tennis club would help to attract new younger members and is ideally located.
Woodland	The development would enhance the wonderful woodland areas within the Loxley Valley for everyone to enjoy.
Density	Number of homes not excessive for the size of the site.
Sport	Retention of the Wragg Pavilion is a benefit to the community and new residents.
Affordable Housing	Affordable housing is good and potential for older persons accommodation and self-build plots.
Flooding	Good to see the project addresses the potential flooding of parts of the site.
Developer	After researching the developer it is believed they have the ethos to strike the correct balance between building the much-needed residential space and protecting the tranquil woodland surroundings so that all members of the community can still enjoy the beauty of the valley.
Anti-social behaviour	The site attracts anti-social behaviour.

Bradfield Village Fellow Cricket Club

Retention and recruitment	The new development is seen as a great opportunity in attracting new members to the club to enable it to survive.
Woodland	Positive to see the retention of the woodland.
Density	The proposal is less dense than previous schemes.
Housing Mix	The proposal represents a good mix of housing
Community facilities	The proposal retains the bowling green some buildings for community uses. The proposal will result in more people to support the local businesses.
Sustainability measures	New bus service if it were to run through Bradfield

Funding for Sport

Derelict land	Site has been derelict for years and in a dangerous state of repair
Re-use of site	Sustainable housing on the brownfield site would be a good solution.
Density	Number of homes does not seem excessive given the plot size
Pavilion	Retention and upgrading of Wragg Pavilion is a benefit to the local community
Bus service	A more frequent bus service for all the community to use is a good idea
Affordable homes	A variety of affordable houses is good and the potential for older persons and self-build plots are good additions
Flooding	Good to see the flooding potential has been addressed
Rural Area	People are essential for rural areas of Sheffield to retain their services and new residents in this area will support local business, sports clubs and charitable organisations.

PLANNING ASSESSMENT

Policy Issues

Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 require that planning applications are determined in accordance with the development plan unless material considerations indicate otherwise.

The Council's development plan comprises the Core Strategy which was adopted in 2009 and the saved policies of the Unitary Development Plan which was adopted in 1998. The National Planning Policy Framework published in 2018 and revised in February 2019 (the NPPF) is a material consideration (paras 2 and 212 of the NPPF).

The documents comprising the Council's development plan date back some time and obviously pre-date the NPPF, but paragraph 213 of the NPPF provides that existing policies in a development plan should not be considered out-of-date simply because they were adopted or made prior to the publication of the NPPF, and that due weight should be given to existing policies in a development plan, according to their degree of consistency with the NPPF. The NPPF provides that the closer the policies in the plan to the policies in the NPPF, the greater the weight that may be given.

Guidance in the National Planning Practice Guidance (the NPPG) further provides that "policies age at different rates according to local circumstances and a plan does not become out-of-date automatically after 5 years", and that "due weight should be given to relevant policies in existing plans according to their consistency with the National Planning Policy Framework. It will be up to the decision-maker to decide the weight to give to the policies".

However in all cases the assessment of a development proposal needs to be considered in light of paragraph 11 of the NPPF, which provides that when making decisions, a presumption in favour of sustainable development should be applied, and that where there are no relevant development plan policies, or where the policies which are most important for determining the application are out of date (e.g. because they are inconsistent with the NPPF), this means that planning permission should be granted unless:

- the application of policies in the NPPF which relate to protection of certain areas or assets of particular importance which are identified in the NPPF as such (for example SSSIs, Green Belt, certain heritage assets and areas at risk of flooding) provide a clear reason for refusal; or
- any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.

This is referred to as the "tilted balance".

In addition to the potential for a policy to be out of date by virtue of inconsistency with the NPPF, Paragraph 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 (which for SCC is 5%, pursuant to para 73 of the NPPF) the policies which are most important for determining the application will automatically be considered to be out of date.

Set against this context, the development proposal is assessed against all relevant policies in the development plan and the NPPF below.

For the purposes of considering the balance in this application the following planning weight is referred to in the report using the following scale:

- Substantial
- Considerable
- Significant
- Moderate
- Modest
- Limited
- Little
- No

Land Use

The site is within the open countryside and lies wholly within the Green Belt as defined by the Sheffield Unitary Development Plan 1998 (UDP).

Policy CS71 (Protecting the Green Belt) of the Core Strategy and saved policies GE1, GE2, GE3, and GE5 of the UDP seek to protect the Green Belt from inappropriate development; protect and improve the Green Belt landscape; with new houses only allowed where they are for the infill of a single plot or replace an existing house on the same site.

Policy CS71 is the most up to date in respect of considering the proposal together with the material planning considerations set out in Chapters 5 (Delivering a Sufficient Supply of Housing) and 13 (Protecting Green Belt Land) of the National Planning Policy Framework (NPPF).

Policy CS71 seeks to safeguard the countryside and other open land around built up areas by maintaining the Green Belt with development needs being met principally through the re-use of land and buildings as opposed to the expansion of urban areas and villages.

Housing Land Supply

Policy CS22 (Scale of the Requirement for New Housing) is the most up to date development plan policy in relation to delivering a sufficient supply of housing for Sheffield, stating that a 5-year supply of deliverable sites will be maintained at all times.

The 5-year Housing Land Supply Monitoring Report March 2020 is the most up to date housing land supply position for Sheffield and has adopted the Government's up to date standard methodology for calculating the local housing need (LHN), including consideration of the appropriate buffer to be used. The report also identifies the sources of housing land that contribute towards the deliverable housing land supply and confirms that the Council has a 5.1-year supply. The 5-year period covered by the report runs from 1 April 2019 to 31 March 2024 inclusive.

For Sheffield the housing requirement calculated for 2019 is 2,124 net additional homes per year.

Paragraph 73 of the NPPF Chapter 5 (Delivering a Sufficient Supply of Homes) requires a buffer of 5% to ensure choice and competition in the market. The Housing Delivery Test (HDT) provides a measure of the net housing delivery in comparison with the housing requirement. Where delivery falls below 95% of the requirement the NPPF requires that a 20% buffer is applied along with a presumption in favour of sustainable development.

In February 2019, Sheffield's delivery was 110% and estimated as 112% in the Government published HDT.

The total 5-year requirement for Sheffield, including the 5% buffer is calculated as 11,151.

Table 1: Sheffield's net housing requirement for the 5-year period 2019/20 to 2023/24

Source: 5-year Housing Land Supply Monitoring Report March 2020

Current local housing need figure	2,124
5-year requirement (2019/20 to 2023/24): 5 years @ 2,124 per year	10,620
Plus 5% buffer to ensure competition and choice	531
Total net 5-year requirement	11,151

The calculations include sites with planning permission, development plan allocations and sites identified on the brownfield register.

The Net Supply for Sheffield is calculated as 11,392. Sheffield can therefore demonstrate a 5.1 year housing land supply.

The delivery of sites with planning permission will continue to be monitored and a new Strategic Housing Land Availability Assessment (SHLAA) will be published alongside the Sheffield Local Plan Issues and Options document in 2020. The Brownfield Land Register was updated January 2020.

The Government's objective of significantly boosting the supply of homes is set out in chapter 5 of the NPPF. Paragraph 73 of the NPPF states that LPAs should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement.

Therefore, the presumption in favour of sustainable development as set out in Paragraph 11 is not applied to the tilted balance in this instance, on the basis that Sheffield can demonstrate a deliverable 5-year land supply.

Spatial Strategy for Sheffield

The Sheffield Core Strategy 2009 sets out the spatial strategy and settlement hierarchy for the city which concentrates new development in the main urban area of Sheffield, complemented by Chapeltown/High Green and Stocksbridge/Deepcar and will mainly take place on previously developed land.

The north-east and south-east areas will have renewed housing markets whilst all other housing areas are to be safeguarded. The Core Strategy states that the surrounding countryside will be protected from development and linked with a network of green corridors, connecting river valley, parks, recreational areas and green spaces with the urban areas.

The settlement hierarchy is therefore concentrated in:

- The City Centre;
- The Lower and Upper Don Valley.

Most of the countryside is protected as Green Belt by the Core Strategy as set out above. Policy CS23 (Locations for New Housing) of the Core Strategy focuses new housing on suitable, sustainably located sites within or adjoining the main urban area and the urban area of Stocksbridge and Deepcar.

The site is located in the Rural Villages Core Strategy Area (Fig 5.1 Core Strategy Areas); housing development outside of urban areas and larger villages is limited to that which is consistent with the policies for Green Belt and Countryside areas. Consistency with the Green Belt policies is considered later in the report.

Previously Developed Land (Brownfield Land)

Policy CS24 of the Core Strategy (Maximising the use of previously developed land) is the most up to date policy for the consideration of promoting the use of previously developed land and aligns with paragraph 117 of the NPPF, in terms of prioritising previously developed sites. Greenfield sites (not previously developed) will only be developed in connection with housing renewal; in connection with identified sites and areas; small sites in urban areas and larger villages; Owlthorpe and sustainably located larger sites in or adjoining urban areas or larger villages where there is less than a 5-year supply of deliverable sites.

The NPPF defines Previously Developed Land as:

Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land

that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.

Loxley Valley has been a producer of refractory bricks since the 1800's and the site was formerly occupied by Hepworth Refractory which ceased operation in the 1990's.

The site consists of various buildings formerly occupied by Hepworth's along with the associated infrastructure and hard standings. Plans showing the existing buildings and extent of the hard standings accompany the application alongside parameter plans showing the indicative proposed layout; buildings to be retained/demolished and land use.

In terms of current site uses and constraints the part brownfield and part greenfield site is adjacent to an operational farm and Yorkshire Water's Water Treatment works. There are 5 residential properties to the south-east of the site as well as several businesses which occupy some of the industrial buildings on site. The majority of the land to the southern part of the site is covered by an Area of Natural History Interest designation protected by saved Policy GE13 of the UDP.

The site falls into flood zones 1, 2 and 3 with flood zone 2 covering the majority of the hard-standing areas adjacent to the river. The River Loxley is defined as a Waterway in the UDP and protected from the adverse impacts of development by saved Policy GE17 of the UDP. There are also a number of bridges across the site spanning the river which provide access to the various areas of the site.

Concerns have been raised about the impact on trees and biodiversity as the site, in places, appears to have returned to a natural state in the intervening period. Details contained within the Arboricultural and Ecological Assessments detail how the site and trees have been un-managed allowing habitat to re-establish within the site.

Whilst some buildings are large, they have blended into the landscape created by the existing tree cover and due to the steep sides of the valley and the tree cover. Despite its size the site is not significantly visible from positions outside of the site, particularly from Loxley Road and the ridge to the north of Loxley Road.

In addition, the site is not identified on Part 1 or Part 2 of the Brownfield Register. Part of the Old Wheel Farm site is identified on Part 1 of the register but not the former Hepworth site.

On this basis, it is considered that some of the developable areas identified are not considered to be 'previously developed' as set out in the NPPF definition. These specifically include some buildings and areas of hard standing particularly towards the edges of the site.

On balance it is considered that the proposal is not confined to areas of the site that are defined as previously developed and is therefore, in terms of the current site uses and constraints, defined as part brownfield and part greenfield.

The aforementioned policies prioritise maximising the use of previously developed land for new housing. Some parts of the site to be developed have been assessed as being greenfield. The site does not sit within the criteria set out by Policy CS24 and, as such, development of parts of the site is considered to be contrary to Policy CS24. Paragraph 117 of the NPPF states that decisions should promote the effective use of land in meeting the need for new homes whilst safeguarding the environment. There is no demonstrated need for new homes and the proposal as presented would not safeguard the environment.

Effective use of land

Core Strategy Policy CS26 seeks to make efficient use of land for new homes, and sets out appropriate density ranges for new homes depending on location and relative accessibility and is consistent with Chapter 11 of the NPPF, particularly paragraph 118 d) which seeks to promote and support the development of under-utilised land and buildings, especially where this would help in meeting identified needs for housing where land supply is constrained.

The site has been vacant for some years and can be defined as 'under-utilised', however, as set out above, it has been demonstrated that Sheffield has a 5-year housing land supply and as such supply is not considered to be constrained. Overall moderate weight is attached to Policy CS26 on the basis that housing land supply is not currently constrained.

Density

The proposal is in outline form and as such densities are indicative. The proposal suggests up to 300 dwellings with a site area of 26.9 ha. Policy CS26 suggests a density of around 30/40 dwellings per hectare for rural areas. The proposal suggests a density of around 11 dwellings per hectare across the entire site which represents an area of 26.9 ha of land, falling below the density suggested in Policy CS26. When taking account of the previously developed areas, as identified by the applicant, which amounts to an area of 8.2 hectares, there would be a density of 37 dwellings per hectare which is consistent with the policy requirements. Whilst the Council seeks to encourage efficient use of land, in this particular instance there are other considerations such as habitat, rural character and design which outweigh the need to deliver a particular density of development. The densities calculated, in terms of efficient use of land, seem suitable given the nature and location of the site.

Paragraph 122 of the NPPF states that, in considering the efficient use of land, it is important to consider the availability and capacity of infrastructure and services - both existing and proposed - as well as future improvements to promote sustainable travel modes. The proposal includes the provision of a new bus service to connect with the site. This is discussed in more detail in the Transport and Highways section below.

Paragraph 122 e) of the NPPF also states the importance of securing well designed, attractive healthy places when considering supporting development that makes efficient use of land. The application has been supported by well thought out strategies, parameter plans and master planning principles; however, insufficient information has been submitted to fully assess whether the proposal would ultimately secure a well-designed, attractive healthy place. Therefore, taking account of this in the balance, moderate weight can be attached to design matters. Design considerations are also considered in more detail in the Design section below.

Identified Needs

The Council's Strategic Housing Team has advised that the proposed development falls within the Peak District Fringe Housing Market Area (HMA). The majority of homes are owner occupied with very few private or socially rented properties present and the majority consist of 3 bedrooms or greater. The area currently has no sheltered housing or extra care provision despite the large older population.

There are currently only 411 socially rented properties within the Peak District Fringe which principally belong to Sheffield City Council with only 22 Housing Association properties. The 2018 SHMA estimated that the area has an annual affordable housing shortfall of 42 properties per annum. Due to the size of the site and scale of the site the full affordable housing requirement needs to be met on this site.

Family households that have lower than average savings or limited financial resources will struggle to buy an average priced property in this area. Shared ownership should also therefore be considered as a way to offer more affordable family housing in the area.

Core Strategy Policy CS41 (Creating Mixed Communities) encourages development of housing to meet a range of housing needs, including a mix of prices, sizes, types and tenures and Policy CS 40 (Affordable Housing) states that, in all parts of the city, new housing developments will be required to contribute towards the provision of affordable housing where practicable and financially viable. The affordable housing requirement in this case is 10%.

The Planning Statement, Design and Access Statement and Illustrative Master Plan set out a commitment to delivering the affordable housing requirement and a range of new homes including family homes, self-build plots and apartments with a mix of tenure. The proposals again are indicative and no detailed information has been provided with regards to affordable housing or types of residential units.

Conclusion to Housing Considerations

The proposal, whilst representing a re-development of partly previously developed land and meeting with the density requirements, does not adequately address the need for certain categories and tenures of housing within this particular location

On balance, having taken into account, all considerations in respect of housing need, promoting previously developed land and efficient use of land; it is considered that there is insufficient information to allow a full assessment of whether the proposal will

result in an efficient use of land and the delivery of the identified local housing need requirements in terms of affordable house and the needs of older people and the lower end of the market (such as for Starter Homes) within this part of the city.

On this basis it is concluded that the proposal is inappropriate development within the Green Belt which is not outweighed by the re-use of the site for housing in so far as the Council can demonstrate a 5.1 year housing land supply; to which considerable weight has been attached. Substantial weight is attached to the saved policies of the Development Plan and the relevant material planning considerations of the NPPF as set out above.

Impact on the Green Belt

As set out above, the site is wholly located within the Green Belt and the Government attaches great importance to the purpose of Green Belts.

In considering the appropriateness of the proposal, it is important to consider the local and national planning policy position in relation to the purposes of the Green Belt and development within it.

The NPPF in paragraph 134 sets out five purposes served by the Green Belt:

- a) To check un-restriction sprawl of large built-up areas;

The proposal would not create unrestricted sprawl of built up areas due to its separation from the existing built up areas.

- b) To prevent neighbouring towns from merging into one another;

The proposal would not result in the neighbouring towns from merging into each other.

- c) To assist in safeguarding the countryside from encroachment;

The proposal would not lead to the significant loss of countryside. However, there are areas where the indicative details show the development overlapping in to areas which are landscape and form part of the countryside and on areas of land which are considered to have blended into the landscape not considered to be brownfield land as set out above.

- d) To preserve the setting and special character of historic towns; and

There are no historic towns close to the site and as such the proposal has no impact on the preservation of historic towns.

- e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

There is little risk of the proposal setting a precedent of development of Green field land. It is considered the proposal assists in urban regeneration of the site for

housing by recycling land which has, in areas, been urbanised and therefore encourages recycling of the parts of brownfield land as identified above.

Saved Policy GE1 of the Sheffield UDP sets out the Council's approach to development and the Green Belt, where development will not be permitted, except in very special circumstances, where it would lead to unrestricted growth of the built up area, or contribute towards merging of existing settlements, lead to encroachment into the countryside or compromise urban regeneration.

Policies GE3 and GE4 deal with development in the Green Belt and GE5 deals specifically with housing in the Green Belt. Development within the Green Belt is not permitted unless it is for purposes defined in Policy GE3 which include agriculture, forestry, essential facilities for outdoor sport and recreation and other uses which comply with Policy GE1. The proposal does not relate to any of these purposes and as such is considered to be inappropriate development by definition. Policy GE3 of the UDP aligns with paragraph 145 of the NPPF with regards to the exceptions where the construction of new buildings is considered to be appropriate.

Policy GE3 is not entirely up to date with the NPPF which also allows for the limited infilling in villages and limited affordable housing for local community needs set out in the development plan.

Policy GE5 only allows for housing development that results in infilling a single plot or replacing an existing house. The proposal does not relate to these criteria and as such the proposal is considered to be inappropriate development.

Policy CS71 of the Core Strategy seeks to safeguard the countryside by maintaining Green Belts. Development needs will be met through the re-use of land and buildings rather than urban expansion. It is accepted that the proposal is for re-use of land and as such has the potential to comply with policy CS71 however, the supporting text to policy CS71 states that the policy will be implemented through the development management process in accordance with national policy for Green Belts and as such defers to paragraph 145g of the NPPF.

Paragraph 143 of the NPPF defines inappropriate development as harmful to the Green Belt and should not be approved except in very special circumstances.

Paragraph 144 of the NPPF states that LPA's should attach 'substantial' weight to the harm to the Green Belt and that 'very special circumstances' will not exist unless the potential harm, by inappropriateness, and any other harm resulting from the proposal is clearly outweighed by other considerations. Other considerations are discussed in more detail below along with the weight officers are attaching in relation to the proposal.

The local policies contained within the UDP for the consideration of development within the Green Belt are considered to be out of date in respect of the re-development of previously developed land and as such the most up to date policies for consideration of the proposal are Core Strategy Policy CS71 in terms of the principle of re-use of land in the Green Belt and paragraph 145g of the NPPF.

To apply the exception in paragraph 145g, the NPPF sets out two key criteria in which the redevelopment of previously developed land is to be assessed:

- The development would not have a greater impact on the openness of the Green Belt than the existing development; or
- The development would 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 in the area of the local planning authority.

Substantial Harm and Housing Need

The applicant has not applied under the second criteria of paragraph 145g and insufficient information has been supplied with the proposal to assess whether the proposal would contribute to meeting an identified affordable housing need within the area of the local planning authority.

As set out above, it is considered that part of the land within the application site that was previously developed with buildings and hard standings is excluded from the definition of previously developed land because the remains of those permanent structures or fixed surface structure have blended into the landscape. Such areas within the site are not considered as previously developed land and would not fall within paragraph 145 g of the NPPF.

The proposal is therefore considered to be inappropriate development and by definition harmful to the Green Belt.

Impact on Openness

A key consideration of paragraph 145g is whether the proposal would have a 'greater' impact on openness than the existing development.

The considerations in relation to the impact on openness include both the assessment of the visual impact and also the spatial impact for which case law exists.

There are areas of the site which do meet with the definition of previously developed land as set out above; these predominantly follow the alignment of the river and the main buildings.

Officers are of the view that visual impact and openness are inextricably linked, the visual impact is a key component of openness, but it is not the whole consideration. Openness is viewed as the absence of development and therefore can be applied to an area where there may be limited visual impact of new development but where development would still affect the open nature.

Case law exists in the case of (Samuel Smith Old Brewery (2020) UKSC 3 on Appeal (2018) EWCA Civ 489), which concluded there are three potential

dimensions to openness, which include the likely visual impact in the assessment of whether the openness of the Green Belt would be preserved.

Whilst there may be other aspects to openness, visual impact should be considered as part of the assessment of impact on openness, and therefore if visual impact has not been satisfactorily assessed, then we cannot determine whether or not there is an unacceptable impact on openness.

Planning law clearly places the onus on the applicant to prove that the development is appropriate in the Green Belt. If it is not possible to assess the development's impact on the 'openness' of the Green Belt, the development must be deemed 'inappropriate'.

The application is accompanied by a Landscape and Visual Impact Assessment (LVIA) to assess the effects of the proposed development on landscape character and visual amenity.

Landscape effects

The applicant's planning statement notes that the existing permanent buildings amount to a footprint of around 29,200m² of the site and that the built development will reduce by 44% to around 16,300m².

The existing hardstanding areas extend to around 86,482m² with 69,404m² proposed showing a reduction in hard standing of 20%.

The volume of buildings as existing has been calculated as 353,610m³ with the total proposed as 131,997m³.

The parameter plans show buildings of up to 4 storeys with an eaves height of around 12 metres in places which are proposed to be set within the lower part of the valley with the remainder of the buildings proposed at 3 storeys with a height of around 9 metres to the eaves.

With the existing heavy wooded back drop the existing buildings are not significantly spatially visible from passing the site or viewing from a distance however, the site will be significantly noticeable spatially in relation to the level of comings and goings associated with up to 300 dwellings along with the associated street lighting which will make the site significantly noticeable at night time when compared the to the existing industrial operational use and considerably noticeable as it currently exists.

It is on this basis that it is considered that owing to the nature and spatial characteristics of the proposal, despite the reduction in the size of the overall built form the proposal would have a considerable impact on the openness of the Green Belt in this particular location when taking into account the balance of the existing use and former use along with the level of activity associated with a substantial residential development. The proposal is therefore contrary the paragraph 145g in relation to spatial impact on openness.

Visual Impact and Landscape

The Landscape and Visual Impact Assessment (LVIA) has been scrutinised by the Council's Landscape specialist who broadly agrees with the outcomes of the LVIA in that the development would result in no significant adverse landscape effects post construction due to the developed areas being generally confined to the previously developed areas and the majority of the other characteristic landscape features remaining intact. However, there are two areas which have not been considered in the LVIA.

Peak Park Landscape Strategy

The Landscape and Visual Impact Assessment (LVIA) submitted in support of the application makes no reference to the Peak District National Park Landscape Strategy and Action Plan 2009 despite the fact that the site falls into the scope of this owing to its location within the Dark Peak Yorkshire Fringe Character Area and within the Slopes and Valleys with Woodland landscape type. There is therefore insufficient information to assess the impact on this specific character area.

Area of High Landscape Value

The site is located within an area of High Landscape Value and as such saved policy GE8 of the UDP is relevant. The LVIA has scoped this out of the assessment due to the wooded nature of the site and policy GE8 considers the impacts on open and agricultural land. Officers disagree with this approach in terms of assessment of landscape receptors. The Area of High Landscape Value relates to the protection of 'special landscape quality' which does not relate specifically to agriculture in nature and neither does it exclude vegetation in relation to open character.

It is therefore considered that the LVIA has not fully assessed the impact of the development on the landscape character and as such it is not possible to determine the full extent of the impact on the wider landscape.

Views

The LVIA sets out potential views into the site and it acknowledges views into the site by residents and farmworkers to the north and west of the site and considers the impact on these receptors, however a significant area to the west of West Lane and Holdworth has been excluded, therefore it is not possible to consider the visual impact in these areas.

The site is visible from the public footpath known as Acorn Hill running between Acorn Drive and the river Loxley where a greater portion of the site is visible; this has not been assessed in the LVIA.

Loss of Woodland

The proposal results in a loss of around 1.6 hectares of existing woodland and tree groups as identified by the submitted Arboricultural Assessment to accommodate the development. This is considered to be a significant loss of woodland that would not only contribute towards the impact of the development on openness; it would be

contrary to saved policy GE15 (Trees and Woodland) of the UDP; Policy CS73 (The Strategic Green Network which will be maintained and enhanced following the main valleys including Loxley) and paragraph 170 a) of the NPPF which seeks to protect and enhance valued landscapes.

Whilst concerns exist with regards to the impact of the proposal on the openness of the Green Belt in terms of spatial impact and activity, insufficient information has been provided to allow officers to properly consider the full extent of the visual impact.

CONCLUSION TO GREEN BELT ISSUES

The Government attaches great importance to Green Belts and their essential characteristics in relation to their 'openness' and 'permanence' which aligns with current local planning policies for Sheffield.

The UDP Green Belt policies are considered to be out of date in parts, particularly in relation to the re-use of previously developed land and housing delivery. The strategic policies within the Core Strategy and the relevant policies of the NPPF are considered to be the most up to date and to which the most weight has been attached.

Whilst National Planning Policies encourages the use of previously developed land to deliver housing needs, it is considered that the proposal as presented would potentially have a considerably greater impact on the openness of the Green Belt than the existing development due to the spatial impact; and nature and level of activity that is not outweighed by any identified affordable housing need. The Council has demonstrated a 5.1 year housing land supply and there is no evidence presented to demonstrate that the application would contribute towards meeting identified housing needs for the area.

The proposal and the submitted LVIA provide insufficient information to fully assess the impact on the openness of the Green Belt.

It is on this basis that the balance weighs in favour of the protection of the Green Belt and it is concluded that the development is therefore inappropriate and as such harmful to the Green Belt. The housing delivery on partly previously developed land does not outweigh this harmful impact, in the context of the available 5.1 year supply of housing.

In conclusion, the proposal is considered to be contrary to Policy CS71 (Protecting the Green Belt) and Paragraph 145g) of the NPPF.

Loss of Employment Land

Policy CS1 (Land for Employment and Economic Development) of the Core Strategy 2009 states that land will be made available for office and industrial development in existing employment areas. Sites will be released for alternative uses where industry or business would no longer be appropriate.

The majority of the site was formerly occupied by an employment generating use and commercial uses remain in operation to the south east of the site, however, the land is not designated as Employment Land.

The applicant has explored the loss of the land for employment use stating that the existing buildings, apart from those to be retained, are in poor condition due to their age and have reached the end of their economic life. The location of the site restricts its re-use for employment purposes due to competition with established industrial locations which benefit from access to motorway networks.

The applicant has advised that the site was designed for a specific occupier type and industrial process which is no longer viable. There is a lack of demand due to feasibility and viability.

The Sheffield and Rotherham Joint Employment Land Review 2015 (Employment Land Review) identifies the main areas for employment uses which include in hierarchy order, Sheffield City Centre, Upper Don Valley, Lower Don Valley and outlying areas such as Mosborough, Woodside, Chapel Town and Ecclesfield alongside other key transport interchanges.

The Employment Land Review 2015 summarises the economic growth potential in relation to different industrial sectors. General Manufacturing reduces from moderate to low/moderate suggesting a lack of growth in this particular sector and as a result a lack of need for sites. Growth of advanced manufacturing, ICT, Utilities, Creative Industries and Healthcare potentially is strong or moderate strong. The site is unlikely to be desirable for these types of uses due to the nature of the site and its location and also unlikely to secure planning permission.

It is therefore considered that little weight is attached to retaining the site for employment uses and there is no conflict with the aforementioned policies.

Transport and Highways

The application seeks approval of the details in relation to the access. Vehicular access is proposed via an existing but improved access on Storrs Bridge Lane and the junction with Loxley Road (B6077) and includes pedestrian and cycle facilities and a secondary access for a potential bus service from Rowell Lane.

Saved policies H15 (Design of New Housing Developments d), BE9 (Design for Vehicles), BE10 (Street, pedestrian routes and cycle way design) and T28 (Transport Infrastructure and Development) of the UDP and policy CS51 of the Core Strategy set out the requirement in terms of transport and highways in relation to new development for housing and transport priorities for Sheffield District.

Paragraph 108 of the NPPF requires that in assessing applications for development it should be ensured that a) appropriate opportunities have been taken up to promote sustainable transport modes given the type of development and the location, b) safe and suitable access to the site can be achieved for all users and c) any significant impacts from the development on the transport network or highway safety can be cost effectively mitigated.

Policy T28 of the UDP is not considered to be fully compliant with the NPPF as it states that development will not be permitted where it is not adequately served by the highway network, whereas the test in the NPPF is tougher in that there must be a severe residual cumulative impact. Therefore, this policy only has limited weight.

A Travel Plan (TP) has been provided in line with paragraph 111 of the NPPF. A Transport Assessment (TA) has also been provided due to the scale of the development. The scope of the TA and the TP has been agreed with the Council's Highways Development Control Team prior to submission.

Storrs Bridge Lane runs on an approximate north south alignment between the application site and the B6077 Loxley Road to the north and has a width of around 5.6 metres with a 1.3 metre footway to the western side.

The B6077 Loxley Road/Storrs Bridge Lane junction is priority controlled and has an approximate width of 7.4 metres and a footway of approximately 1.8 metres to the south side.

Loxley Road (B6077) provides access to the villages of Low and High Bradfield to the west and Rodney Hill provides access to the northern areas of Loxley and the Hillsborough areas of Sheffield, controlled by a priority junction at Rodney Hill/Loxley Road.

Loxley Road continues to the east where it forms part of the Malin Bridge Gyratory which operates in a one-way, clockwise direction, providing vehicle access to the wider areas of Sheffield including the city centre.

The junction with Loxley Road would have 10 metre radii. Visibility splays of 2.4 x 160 metres can be achieved onto Loxley Road (which is an improvement). The existing junction warning signs on Loxley Road would be replaced with new, possibly with reflective yellow backing boards. The existing speed limit increases from 40 mph to 60 mph travelling westbound, at a point 215 metres past the Rowell Lane junction.

Speed limits would be reviewed within the Road Safety Audit process. At the other end of Storrs Bridge Lane, the alignment would sweep to the right, with a new priority junction to the left leading into the development site. The existing track leading to the agricultural buildings from Rowell Lane would remain unadopted but be improved/reconstructed to a standard suitable for use by pedestrians, cyclists and public transport.

Walking and Cycle Links

Storrs Bridge Lane is proposed to be reconstructed, to full adoption standards. The carriageway would be widened to 6.5 metres and a footway of 1.8 metres wide would flank the eastern side, with a 1.0 metre margin on the western side. New drainage and lighting would be provided.

A previous approval for Forge Valley School included significant investment towards enhancing the pedestrian and cycle environment locally in an effort to improve safety and increase/encourage the use of these modes of travel.

Cyclists approaching from the Langsett Road direction have the option of avoiding Holme Lane and the gyratory by using Thoresby Road, which runs into a shared pedestrian/cycle route before joining Watersmeet Road.

It is then possible to cycle across the Rivelin Valley Road toucan and off carriageway around the corner on the shared pedestrian/cycle surface flanking Holme Lane, across the splitter island at the bottom of Stannington Road before re-joining Loxley Road after the toucan near Dykes Lane.

Cyclists approaching from the Middlewood Road direction have the option of avoiding Holme Lane and the gyratory by using Taplin Road, Harrison Road, and Dykes Lane, before crossing on the aforementioned toucan to re-join Loxley Road again.

Unfortunately, there is no scope to provide off-road cycle facilities along Loxley Road. The northern side, all the way from Holme Lane to Long Lane has frontage development in the form of private housing. Beyond Long Lane on the northern side is Loxley Nurseries and further residential property. Essentially, the northern side of Loxley Road has development frontage all the way out to Rowell Lane.

Having cyclists off-carriageway here would cause too much conflict with property owner vehicle movements on and off the carriageway. The footway is also too narrow to avoid conflicts with pedestrians. There are similar problems along the south side of Loxley Road, though the frontage development here doesn't extend out quite as far, stopping at Black Lane.

Loxley Road has always been well used by cyclists for recreational trips out towards Bradfield and beyond. Motorists are well used to seeing cyclists out and about, and on the whole seem to drive with due care and attention.

Crashmap data has been analysed (assessing cycle related personal injury accidents) for the length of Loxley Road from Malin Bridge, out to Damflask Reservoir, for a 5-year period up until 2019. When cyclists are involved in accidents, the severity of their injury tends to be higher than for people protected by the shell of a car. For the study area and timeframe described above, there have been two separate accidents involving personal injuries to cyclists.

One occurred at the bottom of Rodney Hill, resulting in a serious injury. The other occurred 100 metres east of Black Lane, resulting in two serious injuries. All accidents are regrettable and sometimes tragic, but this analysis hasn't highlighted a high proliferation of cycle related accidents, particularly considering the relatively high use of Loxley Road by cyclists.

Online representation has been very clear in not wanting to see public footpaths along the valley converted to bridleways to allow cycle use. This is something officers agree with. The routes are not suitable for cycle use. The footpaths are really

well used by the public. The widths in certain areas and gradients would cause too much conflict with walkers if cyclists were introduced. In most instances, there is no scope to widen or carry out improvements to these paths that would make them conducive to cycle use.

It is unfortunate that no scope exists to provide some positive cycling infrastructure improvements along Loxley Road (above what has already been provided to circumvent the gyratory).

Cyclists from the development proposal will have to cycle on-carriageway along Loxley Road, in much the same way existing residents do on the stretch out to Long Lane.

For walking, cycling and public transport, depending on the location of any development, there's clearly a sliding scale ranging from highly sustainable, to not sustainable. Highway officers are of the view that for this development, the submitted Transport Assessment has demonstrated that these transports options do exist which are viable alternatives to the private car.

However, officers are of the view that whilst the site may not be 'isolated' in the true sense of being 'far away from other places or people', in considering the availability and location of existing services and facilities, the topography and nature of the site will act as a barrier to these being a reasonable option other than by private car. How the site will function as a new community plays in the balance of consideration in respect of whether the development is considered to be 'sustainable'. Despite being located close to the settlements of Loxley and Stannington; officers remain of the view that other constraints exist which make access to local facilities difficult on a day to day basis.

Access to Local Services

Concerns have been raised with regards to the availability and impact on GP's and other local facilities. The closest medical centre is Stannington Medical Centre at the site in Stannington Neighbourhood Centre. The Public Health Team and the NHS have been consulted; however, no comments have been received.

The Sustainability Statement accompanying the application states that there are wide range of local facilities within close proximity (around 2km) to the site in the local centres of Loxley and Stannington.

The mid-point of the development would be just less than 2 kilometres from Loxley Primary School on Rodney Hill. Wisewood Community Primary School is a further 500 metres to the east along the same road. The Old Loxley Post Office (a general store selling food, drink and newspapers) is a similar distance away on Loxley Road. These distances are as you would walk them, not as the crow flies. The document titled 'Providing for journeys on foot' published in the year 2000 by The Institute of Highways and Transportation quotes 'acceptable' and 'maximum' walking distances to different types of destination. For schools, the distances are 1000 and 2000 metres respectively (acceptable & maximum), so the schools are on the limit of being the maximum distances that the Institution recognises pupils will walk.

In addition to the above publication, more recently in the year 2014, the Department for Education published the document titled 'Home to School Travel and Transport' which suggests the maximum walking distance to school for children under the age of 8 is 3.2 kilometres, and 4.8 kilometres for children over 8 years old.

The South Yorkshire Residential Design Guide SPD (SYRD) whilst not formally adopted by Sheffield City Council is a material consideration. The SYRDG considers accessibility criteria for new residential development. THE SYRDG suggests that all submissions must demonstrate that the proposals achieve levels of accessibility. Accessibility to facilities and services is fundamental to the proper functioning of a neighbourhood.

In table N1.2 the broad accessibility targets for each residential area is set out. The site is defined as a 'rural area'.

As a general rule of thumb, a 5 minute walk equates to a distance (actually travelled rather than straight line distance) of 400 metres for non-disabled people. For different groups of disabled people, these distances are significantly less.

Therefore, walking distances to the local centre (2km away) are estimated to take around 40 minutes. In terms of rural settlements, the SYRDG suggests access to local services is via bus, distance to bus/tram stop is a 10-minute walk and access to primary health and education is a 40 minute journey.

The nearest bus stop on Loxley Road via Rowell Lane is around 1km away which is slightly over the 10 minutes (14 mins) suggested by the SYRDG.

SYRDG suggest access to health centres is 40 minute 'journey' (not walking). Stannington Medical Centre is 2.4 km, when taking account of the 400 metres per 5 minutes distance, this would suggest it would be around 30 minutes to walk but it has to be recognised that this is up a very steep hill without footpaths.

In terms of access to facilities walking and journey the IHT guidelines suggests that a 40-minute walk is acceptable in terms of access to schools where the SYRDG suggests a 40 minute journey is acceptable for rural settlements.

The proposal also includes the provision for a dedicated bus service into the site for a period of 5 years.

However, the SYRDG states that account must be taken of indirect routes and topography in estimating walking times. The design should also take account of the needs of disabled and older people, including regular opportunities to rest safely on key routes.

The proposal includes full permission for the use of the retained buildings as mixed-use community hubs including uses such as small shop, café or bike hire but there is no certainty that the market will provide for these.

Taking account of the topography of the area it is estimated that this would take much longer and particularly so during inclement weather and possibly along routes which are not well lit or easy to navigate; that, along with the lack of detail to assess whether the needs of disabled and older people are taken account of and the uncertainty in the medium to longer term as to whether the suggested new bus service would be viable leads officers to be of the opinion that the site does not achieve acceptable levels of accessibility.

The SYRDG also suggests that all new development in the case of large-scale proposals may need to create a new centre. Officers are of the view that, whilst the above guidance suggests that local facilities would be accessible and that it is reasonable to expect rural settlements to rely on public transport to some extent, due to the nature, location and topography of the site along with the current pressures on nearby local facilities such as schools and health centres, officers are of the view that the proposal should create a new centre to support the daily needs of the future occupiers.

On the basis that the application is in outline form, insufficient information is available to consider the possibility of a new local centre and indeed if this would be deliverable and viable.

Public Transport

The nearest bus corridor is on the B6077 Loxley Road with the nearest stop around 710 metres from the site serving Hillsborough – Loxley.

The closest Supertam stop is around 4.5 km from the site in Main Bridge. The bus service from Loxley Road also provides access to the Hillsborough Interchange in around 21 minutes from the site, providing connections to the City Centre, rail station and university every 12 minutes.

The secondary access at Rowell Lane would be improved and will be solely for the use of buses (with a bus gate most likely in the form of rising bollards or an automatic gate); pedestrians; cyclists and access to and from the farm.

The indicative details state that the pedestrian and cycle connections across the site will be lit, surfaced and overlooked, providing high quality linkages through the site.

Discussions have taken place between the developer and First South Yorkshire Ltd and agreement has been reached to extend the 52a service into the development site via Storrs Bridge Lane and out via Rowell Lane (4 buses per hour) between 0700 hrs and 1900 hours, Monday to Saturday.

The developer would fund this provision for a 5 year period, at £150,000 per annum plus VAT, after which funding will stop and it is hoped the service will be self-sufficient. This will provide a link to the Hillsborough Interchange.

The financial contribution would be secured by a legal agreement under Section 106 should planning permission be granted. A decision is still to be taken as to the occupation trigger that needs to be hit before the service is commenced.

Additionally, bus stops are currently located on Loxley Road close to Storrs Bridge Lane and Rowell Lane carrying service numbers 61 & 62, which connect Loxley, Bradfield, Dungworth and Hillsborough. These stops will be retained. Shelters and raised footways will be provided to increase the attractiveness of use by the new residents.

Transport Network

Traffic surveys were undertaken at the B6077 Loxley Road/Storrs Bridge Lane priority-controlled junction and B6077 Loxley Road/Rode Hill Priority Junction. The dates and times and location of the surveys were agreed with the Council's Highway Development Control Team.

The transport assessment sets out the surveyed flows for key links to Malin Bridge gyratory.

The modelling has been jointly undertaken by Eddisons/Croft and Fore Consulting Ltd, who had access to the Council owned micro-simulation model of the Upper Don Valley. The micro-simulation is a 'real-time' model which replicates the build-up and dissipation of traffic on the highway network throughout the day and during the peak periods. The peaks considered for the development were AM weekday 0800 – 0900 hrs, and PM weekday 1700 – 1800 hrs. The micro-simulation was used to model the gyratory. Also modelled, using the computer software PICADY were the junctions of Loxley Road with Storrs Bridge Lane and Loxley Road with Rodney Hill.

The cordon for the micro-simulation model contained the Malin Bridge gyratory and Holme Lane, which extended back through Hillsborough Corner. The Ball Street junction was added. Dykes Lane, Loxley Road, Stannington Road (with the new site access and right-hand turning pocket into Lidl), and Rivelin Valley Road, along with their approaches were all included. The geometry configuration for the modelling also picked up the bus stop location associated with Lidl.

Automatic traffic counts were undertaken of traffic entering the gyratory over a 7-day period commencing 16 April 2018. A video count was undertaken on Holme Lane owing to the presence of tram track. The model was calibrated to ensure the outputs for the base conditions replicated actual known/observed queues and delays on the network contained within the cordon. The Council's urban traffic control team validated this work. More recent surveys were undertaken in 2019 at the two Loxley Road junctions.

Committed developments included in the modelling were: Stopes Road (62 dwellings), Greaves Road (39 dwellings), and Uppergate Road (19 dwellings). Trips to Lidl and turning manoeuvres at the Store's access off Stannington Road were also included.

Trip generation from the development (300 houses) was derived from TRICS, which predicted 38 arrivals and 110 departures during the weekday morning peak, and 105 arrivals and 56 departures during the weekday evening peak. Officers felt these flows seemed an under-estimation of the likely generation, so undertook some

counts of their own at Highfield Rise, a cul-de-sac serving 84 family properties not far from the Crown and Glove (so on the edge of Stannington). Officers found the trip rate per dwelling to be in the order of 24% higher than the rates suggested by TRICS. Accordingly, a second round of modelling was undertaken as a sensitivity test, increasing the TRICS rates by 24%, which gives 47 arrivals and 136 departures during the weekday morning peak, and 122 arrivals and 79 departures during the weekday evening peak.

Trips were assigned to the highway network in accordance with existing turning proportions as follows: Upon joining Loxley Road from Storrs Bridge Lane, 2% turn left towards Bradfield, 98% turn right towards Malin Bridge. Upon approaching Rodney Hill, 41% turn left, and 59% continue straight ahead along Loxley Road towards the gyratory. The developer contests that the TRICS data is the most accurate, but focussing on the sensitivity test, of the 136 development vehicle trips leaving the site during the weekday morning peak, 133 turn right into Loxley Road. 53 turn left into Rodney Hill, with 80 continuing ahead to the gyratory (or 1.33 vehicles per minute). During the weekday evening peak 122 vehicles enter the site, of which 72 approach having passed through the gyratory (or 1.2 vehicles per minute) and 50 approach from Rodney Hill. For the actual modelling, flows were 'growthed' to the anticipated completion year of 2029.

So comparing the different scenarios, there is the 'existing base scenario' (pre-committed development); the 'do-minimum scenario' (base + committed development); and the 'do-something scenario' (base + committed + new development trips). This last scenario was run with the TRICS data for development trips, and also sensitivity tested (+24%). The summary below is of the +24% modelling.

The capacities of the two Loxley Road junctions remain practically static when the development TRICS data plus 24% is added to the 2029 base flows. The only slight capacity decrease occurs in the weekday evening peak at Rodney Hill, where the ratio of flow to capacity rises from 0.31 to 0.44. A ratio of 0.85 is generally considered a comfortable operating ratio. A junction is considered to be operating at over capacity when the ratio exceeds 1.0. The slight increase in the weekday evening peak ratio doesn't generate any noticeable additional queuing at Rodney Hill. For the Storrs Bridge Lane junction, even the ratio of flow to capacity remains static when development trips are added.

Moving to the gyratory, the junction operates at very close to capacity during the peak periods, sometimes spiking into over-capacity. Slow moving queues are generally the norm. The micro-simulation showed the difference in the average queue lengths (measured in car lengths) approaching the gyratory from the different arms between 'do-minimum' and 'do-something + 24%'.

Weekday morning peak hour increase/decrease in average queue length:

Approaching from Holme Lane + 0.3 passenger car units.

Approaching from Rivelin Valley Road – 0.1 passenger car units.

Approaching from Stannington Road + 2.8 passenger car units.

Approaching from Loxley Road + 2.4 passenger car units.

Approaching from Dykes Lane – 0.2 passenger car units.
Approaching from Ball Road + 0.1 passenger car units.

Weekday evening peak hour increase/decrease in average queue length:

Approaching from Holme Lane + 1.7 passenger car units.
Approaching from Rivelin Valley Road + 22.1 passenger car units.
Approaching from Stannington Road + 1.6 passenger car units.
Approaching from Loxley Road + 0.1 passenger car units.
Approaching from Dykes Lane + 0.2 passenger car units.
Approaching from Ball Road + 0.2 passenger car units.

In conclusion, the modelling seems fairly reflective of the relatively modest development related flow heading towards the gyratory in the morning (1.3 vehicles per minute) and passing back through in the evening (1.2 vehicles per minute). The approach that stands out is Rivelin Valley Road in the evening peak, with queues of + 22.1.

Highways Officers are aware that this is the approach that currently queues the most in the evening. A fair amount of commuter traffic passes down Walkley Bank Road, joining Rivelin Valley Road via Watersmeet Road, prior to joining Holme Lane. Drivers on Rivelin Valley Road periodically let traffic out from Watersmeet, but there's not much stacking before joining Holme Lane. In the evening peak, there are also fewer gaps in the Holme Lane traffic for Rivelin Valley Road traffic to break into. There's a lot of interaction here (a toucan crossing as well). Whilst the micro-simulation is the best modelling tool to use on the gyratory, officers feel the queue might be slightly over predicted here, in much the same way some of the Forge Valley School predicted queuing hasn't actually come to fruition. Whatever the queuing is here, it is likely to be split between Rivelin Valley Road and Walkley Bank Road.

Highway officers fully accept that the gyratory is at/over capacity for spells of the peak periods, but their view is that the development traffic doesn't materially impact on this, certainly not when considering existing background flows.

The Council is also in the process of undertaking a study looking into easing traffic flows east/west along Holme Lane into Bradfield Road and north/south Langsett Road into Middlewood Road, combined with assessing how traffic emerges from Walkley Lane. There are also a number of right turns from Holme Lane which hold traffic behind particularly during the evening peak. An aim of the study is to identify measures to improve public transport efficiency.

The developer is aware of this study and willing to make a financial contribution to assist with the funding which would be secured through a legal agreement under Section 106.

Travel Plan

A Framework Travel Plan has been submitted with the application, of which one of the key features is extending the number 52a bus service into the site. A Travel Plan

Co-ordinator will be appointed, and residents will receive a Travel Pack containing travel awareness information, promoting car sharing, walking and cycle maps, encouraging public transport use, home working, home deliveries. All houses will have broadband internet connection. The Travel Plan will be monitored, and targets reviewed by the Co-ordinator in conjunction with the Council, all in an effort to reduce single occupancy car trips. Should planning permission be granted a detailed Travel Plan would be required and secure via an appropriately worded condition.

CONCLUSION TO HIGHWAY ISSUES

The EIA states that the proposed development will not result in any significant adverse effects on the surrounding local highway network in either of the assessment scenarios. There will be some changes during the construction phase that may have a short term adverse impact on road users during the construction activity, however when complete the development would amount to a slight adverse impact on road users within the vicinity of the site.

Paragraph 108 of the NPPF states that any significant impacts on the transport network, in terms of capacity and congestion, or on highway safety should be cost effectively mitigated to an acceptable degree.

The proposed development includes a range of measure to mitigate the potential effects of the development on highway safety and the transport network such as a Construction Environmental Management Plan (CEMP) to manage the demolition and construction phase. Travel Plan measures to encourage sustainable transport, home working and online deliveries. Retention and enhancement of the footpath network, provision of bus infrastructure and a 4-hourly service to the city centre and Hillsborough interchange which will reduce the need for residents to travel by private car and reduce the impact on the highway network.

The Council's Highways Officer raises no objections to the proposal subject to a range of highway improvements and contributions:

- Review/promotion of Traffic Regulation Orders in the vicinity of the development site (waiting/loading restrictions and speed limit) entailing advertising, making and implementing the Traffic Regulation Order subject to usual procedures (including provision and installation of regulatory traffic signs and road markings) as deemed fit by the Local Planning Authority.
- Reconstruction and widening of Storrs Bridge Lane to full adoption standards broadly in accordance with submitted drawing number 2285-F03 rev C, including earthworks and structural support as necessary, and submission of associated structural AIP's. Visibility splays and the junction arrangement onto Loxley Road are also to be provided broadly in accordance with this drawing, along with the priority junction serving the development site towards the bottom of Storrs Bridge Road.
- Reinstatement of redundant vehicle crossings.
- Reconstruction of the track leading to the agricultural buildings from Rowell Lane (including a properly formed junction with Rowell Lane), which is to be illuminated and drained, such that it is suitable for use by pedestrians, cyclists and public transport.

- Provision of 4 bus shelters and raised footways (to SYPT specification and supplied by them) on Loxley Road at the existing stops near Storrs Bridge Lane and Rowell Lane.
- Any other accommodation works to statutory undertaker's equipment, traffic signs, road markings, lighting columns, and general street furniture necessary as a consequence of development.
- Extending the public transport into the development site at a suggested trigger of the occupation of the 80th dwelling in line with guidance whereby a Transport Assessment is required or an alternative trigger in line with agreed phasing with the LPA.
- Contribution to funding Hillsborough transport study aimed at improving the circulation of traffic, particularly public transport.

Finally, the Council's Highways Officer has technically assessed the highways and transport implications and raises no objections subject to the aforementioned measures.

Paragraph 109 of the NPPF states that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual impacts on the road network would be severe. The TA has demonstrated that there would be a slight adverse effect on road users, cyclists and pedestrians during the short term from the construction phase which is deemed not to be significant and overall the residual effects of the development are 'Not Significant'.

Taking in the round, the proposal is considered not to have an unacceptable impact on highway safety and the residual impact would not be severe, for which significant weight is attached. Access to local facilities on site are not confirmed, walking distances to local facilities are within guidelines and the proposed bus service would contribute towards providing a sustainable transport option for residents for which moderate weight has been applied due to the uncertainty of the bus service not being confirmed beyond 5 years. It is considered that the site is far from ideal in terms of accessibility due to the nature, location and topography of the site, such that local facilities are not readily accessible, in addition to those facilities already being under pressure.

Taking into account paragraphs 108 and 109 of the NPPF the proposal is considered to be acceptable on highway safety grounds and traffic impact on the network would not be severe; however, overall it is felt that the location of the site is far from sustainable due to poor access to existing local facilities and lack of integrated facilities.

Flooding and Drainage

Core Strategy Policy CS 67 (Flood Risk Management) seeks to reduce the extent and impact of flooding and requires the use of Sustainable Drainage Systems or sustainable drainage techniques, where feasible and practicable.

Policy CS 63 (Responses to Climate Change) also promotes the adoption of sustainable drainage systems (SuDS).

Paragraph 155 of the NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from the highest risk areas. Where development is necessary in such areas, the development should be made safe for a lifetime without increasing flood risk elsewhere.

With regard to flood risk, the application site is located across Flood Zones 1, 2 and 3 meaning that it is in an area of low flood, medium and high risk of flooding. A site-specific Flood Risk Assessment should be provided for all development in Flood Zones 2 and 3.

The application is accompanied by a Flood Risk Assessment (FRA), Sequential Test (ST) and Exceptions Test (ET).

There are two ordinary watercourses that affect the site, the Sykehouse Brook which outfalls into the River Loxley around 230m to the west to of the site and the Storrs Brook which outfalls into the River Loxley on the eastern site boundary.

Flood Risk

The Environment Agency, the Lead Local Flood Authority (LLFA) and the Council's Flood Policy Officer have been consulted.

The Environment Agency has confirmed that they have no objection to the application providing the development is carried out in accordance with the flood risk assessment which includes the following measures:

- Flood barrier between Mill Leat and Pond
- Finished floor levels of new buildings no lower than 600 mm above the 100 year plus 30% climate change level and 150 mm above surrounding ground levels
- Upstream vehicular access bridge to be replaced
- New vehicular access bridge for emergency access
- Interception ditches
- Flood resilience measures

It then turns to whether the proposal has adequately applied the Sequential Test and Exception Test.

Sequential Assessment

The sequential test is to steer new development to areas of lowest risk of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for development in areas that are of lower risk from flooding.

The NPPF makes clear that residential developments in high flood risk zones should look to apply the Sequential Test. Paragraph 158 sets out that the aim of the sequential test is to steer new development to areas with the lowest risk of flooding.

When applying the Sequential Test, a pragmatic approach on the availability of alternatives should be taken. The sequential test examined a range of sites based on an agreed list of criteria with the Flood Policy Officer at pre-application stage. Two sites were identified and considered in more detail both of which were discounted due to viability and availability.

The sites identified were Stocksbridge Steel Works and Norton Aerodrome, both of which were considered large enough to accommodate the development, but questions arose about their availability. The LPA is satisfied that it has been demonstrated that the sequential test has been 'passed'.

Exception Test

Table 3: Flood Risk Vulnerability and Flood Zone 'Compatibility' sets out the circumstances where the Exception Test should be applied.

Residential development is classed as 'more vulnerable' by national policy and as such for the exception test to be passed, paragraph 160 of the NPPF states that it should be demonstrated that:

- a) The development would provide wider sustainability benefits to the community that would outweigh the flood risk; and
- b) The development would be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and where possible, will reduce flood risk overall.

Both elements are to be satisfied to pass the test.

In terms of part a) sustainability benefits

- A new frequent and reliable bus service that runs through the site and stops within the Site at accessible locations to improve the public transport offer for new and existing residents;
- New attractive walking and cycle routes that connect to existing public rights of way to improve connectivity across the site;
- Streets that maintain low vehicle speeds to make walking and cycling through the site a safer and more pleasant experience;
- A development that is not dominated by private cars but provides adequate space for parking; and,
- Provision of private and communal electric vehicle charging points.

Whilst these measures are considered to be 'wider sustainability benefits' that could outweigh the flood risk, they are only indicative and lack detail, as such officers are not confident that the measures will be delivered as part of an eventual scheme.

The second part of the exception test, part b) is about ensuring the proposed development is safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reducing flood risk overall. The EA and the LLFA have confirmed that there are no concerns with regards to these considerations.

It is therefore the view of officers that:

- Sequential Test has been passed.
- Part a) of the Exception Test has failed due to uncertainty in the eventual scheme as a result of the lack of detailed information.
- Part b) of the Exception Test has been passed

The proposal is therefore contrary to paragraph 161 of the NPPF that requires both elements of the exception test to be satisfied for development to be permitted. Significant weight has been attached to the consideration of the lack in confidence that the development would provide wider sustainability benefits as part of the eventual scheme.

Sustainable Drainage

A sustainable drainage statement with the application has set out an outline drainage strategy for the site based on the area of 29.6 ha. The statement comments that the existing site has a permeable area of 6.98 ha and the proposed development would have an impermeable area of 5.09 ha.

The existing site outfall has been assessed based on run off rates for 1 in 1 year up to 1 in 100 year, ranging from 480.1 litres per second to 1760.5 litres per second. The proposed development would result in 345.5 litres per second run off up to 1 in 100- year.

The proposal introduces the principle of detention basins, permeable paving, rain gardens and underground storage to manage surface water runoff and sustainable drainage systems. The information provided is sufficient to assess impact at outline planning stage, future detailed applications would require final drainage strategies based on the principles supplied.

The LLFA have advised that sufficient information has been received with regard to surface water management at outline stage. Details of sustainable drainage (SUDS), drainage infrastructure management and discharge rates will be required with a reserved matters submission.

Foul Water

The supporting information states that there will be an increase in foul water flows to the local sewer network. Yorkshire Water is the Statutory Undertaker for foul drainage in this area and have been consulted and raise no objection in principle. They have commented that the indicative design shows an internal road layout which may result in operational difficulties for their tankers when accessing the water treatment works to the west of the site.

The internal layout is indicative and as such not being considered as part of this application. Yorkshire Water have not objected on the basis that they would make comment on the detailed scheme in terms of their operational requirements.

Conclusion to Flooding and Drainage Issues

The EIA has concluded that the sustainable drainage measures will result in a minor benefit long term. Effects arising from construction and operation phases of the development are negligible or minor beneficial subject to appropriate mitigation measures.

There are no objections from the Environment Agency, Statutory Water Undertaker or the Council's LLFA and drainage team.

It is therefore concluded that, whilst there is confidence that the measures contained in the Flood Risk Assessment will protect both people and property from unacceptable risk of flooding, the site has the potential to include sustainable drainage measures and that there are no other sequentially preferable sites available; the level of detail provided is insufficient to give confidence that the scheme would provide wider sustainability benefits overall.

It is on this basis that the proposal is considered to be contrary to the aforementioned local and national policies.

Natural Environment

The NPPF in paragraph 170 states that planning decisions should contribute to and enhance the natural environment and sets out the key characteristics of the natural environment which include protecting and enhancing natural landscapes, character of the countryside, minimising impacts on biodiversity and providing net gains in biodiversity, preventing new development from adding to or being affected by unacceptable risks of sources of pollution and remediating/mitigating contaminated, unstable and derelict land where appropriate.

Statutory Importance

Designated areas of statutory importance have been identified as:

- Stannington Ruffs Site of Special Scientific Interest (SSSI)
- Eastern Peak District Moors SSSI
- Peak District Moors Special Protection Area (SPA)
- South Pennine Moors Special Area of Conservation (SAC)

Potential impacts arising from the development have been identified as increased noise, dust and changes to the water table that will impact on water courses during the construction phase and the pressure placed on designated sites through human activity arising from increased visitors.

Local Importance

The site is located within Dam Flask and Rowel Bridge Local Nature Sites (LNS) in addition to Beacon Wood located around 80m to the south east of the site designated as semi-natural ancient woodland.

Ecology

Saved GE11 (Nature Conservation and Development) of the UDP expects the natural environment to be protected and enhanced. The design, siting and landscaping of development should respect and promote nature conservation and include measures to reduce any potentially harmful effects of development on natural features of value.

GE11 conforms in part with the NPPF, which focuses on biodiversity net gain, and has moderate weight.

Furthermore, a key principle of the NPPF is to protect and enhance biodiversity and geodiversity. In determining applications, the LPA should ensure that if significant harm to biodiversity results from a development that cannot be avoided it should be adequately mitigated and compensated for; if this is not possible planning permission should be refused.

The site is located partially within the Loxley Valley: Damflask to Rowell Bridge Local Wildlife Site which covers around 89 ha and includes ancient woodland surrounding the industrial buildings and hard landscape, the River Loxley, Storrs Brook, Sykehouse Brook and Old Wheel Dam.

Policy CS73 The Strategic Green Network states that within and close to the urban areas, a Strategic Green Network will be maintained and where possible enhanced, which will follow the rivers and streams of the main valleys:

- a. Upper Don
- b. Loxley
- c. Rivelin
- d. Porter
- e. Sheaf
- f. Rother
- g. Lower Don/Canal;

Sheffield's main river corridors are one of its most distinctive and valued features, defining the main areas of the city and associated with its historic development. They form part of a more extensive network of locally accessible open space that provides the means for wildlife and people to move through the built-up areas and to connect with the surrounding countryside.

Policy CS74 Design Principles

High-quality development will be expected, which would respect, take advantage of and enhance the distinctive features of the city, its districts and neighbourhoods, including: a. the topography, landforms, river corridors, Green Network, important habitats, waterways, woodlands, other natural features and open spaces;

The EIA concludes that potential significant impacts on habitats and protected/notable species within the site as a result of the development have been considered and that a proposal which is ecology led include embedded mitigation

measures to reduce impacts in addition to mitigation measures during demolition/construction phase which will result in 'no significant adverse impacts'

Natural England, The Wildlife Trust and the Councils Ecology team have been consulted on the application.

Surveys

The Council's Ecologist has been consulted and advised that the data submitted with the reports is 6 years out of date and that an up to date search of the Biological Record should be undertaken. Surveys provided were undertaken in 2014 and the site has become more vegetated since then.

An up to date data search (July 2020) has been carried out; however this is only part of the initial desk-based component of any assessment.

The surveys are still out of date and undertaken at a sub-optimal time of year. The Chartered Institute of Ecology and Environmental Management (CIEEM) guidance recommends that surveys older than 3 years are unlikely to be valid.

Woodland

An Extended Phase 1 Habitat Survey was provided; however, this was undertaken at a sub-optimal time of year to carry out surveys on the ancient woodland. Reports state that trees will be lost but there is no detail in terms of how many.

The suggestion that the development would result in 'a higher value woodland' is difficult to appreciate given the lack of baseline information.

The Council's Ecologist disagrees with the conclusion that human disturbance will amount to a minor to moderate beneficial impact.

River Corridor

The river currently runs through a site which is dark and undisturbed, an 8-metre buffer is suggested by the reports and the indicative scheme. This is considered to be inadequate given the development would result in housing and infrastructure such as lighting within close proximity to the river corridor.

SCC Guidance for Officers (which takes in to account Natural England guidance for woodland sites) suggests a 15m minimum buffer for woodland and 10-15m for wetlands and water bodies (not watercourses, which are case-specific).

Millpond

Generally human presence tends to defer wildlife and it is considered that information posters and viewing platforms will encourage more visitors and as such this is considered to be detrimental rather than enhancing nature conservation.

Bats

Bat and Owl surveys have been undertaken; however, the timing has not followed the Bat Conservation Trust Guidelines 2016. There has been no explanation or justification for deviating from the guidelines.

The information supplied suggests that there are at least 8 species of bats recorded on site for roosting, foraging or otherwise. This gives the impression that the site is popular for bats and could also be used for swarming, which occurs in autumn. There is no information with regards to swarming surveys.

Overall the Council's Ecologists disagrees with the ES conclusion that the development would have a minor beneficial impact on commuting, foraging or roosting bats and that swarming and maternity roosts haven't been sufficiently investigated.

Birds

Again the bird breeding survey was carried out in 2014/15 which is now considered to be out of date in line with CIEEM guidelines, as such it is not considered possible to fully assess the impact based on out of date surveys and an updated survey should be carried out.

The mitigation suggests that the provision of gardens would enhance the habitat for birds as there is no control over private garden spaces this cannot be used as mitigation or enhancement.

Reptiles

The assessment is acceptable, a precautionary approach should be adopted, and Reasonable Avoidance Measures included in a CEMP should planning permission be granted.

Badger

Surveys have not been carried out in the woodland habitat, given the mobility of the species a full check should be made, and this should be included in the mitigation measures.

Habitat Regulations Screening (HRA)

An HRA assessment is required for planning applications which are not directly connected with or necessary for conservation management of a habitat site to consider if the proposal would have a significant effect on the site.

The findings of the submitted HRA screening exercise are acceptable. Based on the information provided, the assessment of anthropogenic (human activity) disturbance that it 'would not be a significant adverse impact' due to the distance (approx. 2.5km at its closest extent) to the SAC, SPA and SSSI features is considered to be reasonable.

Biodiversity Net gain

Policy GE11 of the UDP conforms in part with the NPPF, which focuses on biodiversity net gain, and has moderate weight.

Paragraph 175 d) NPPF states that opportunities to incorporate biodiversity improvement should be encouraged, especially where this can secure measurable net gains for biodiversity (BNG).

Whilst BNG is not contained with the Sheffield Plan, the Environment Bill 2019 is awaiting Royal Assent which requires the BNG will happen within the lifespan of the project and as such is a material planning consideration and a basis for reserved matters application.

No BNG has been supplied and the LPA considers that due to the nature and location of the site a 10% biodiversity net gain should be demonstrated.

Considerable weight is attached to the importance of the site for nature conservation. Officers are of the view that insufficient and out of date information has been submitted to fully assess the nature of the habitats, the impact on biodiversity or form the basis of any net gains and enhancement in biodiversity as set out in the aforementioned local and national planning policies.

Trees and Landscaping

Saved Policy GE8 of the UDP seeks to protect and enhance areas of high landscape value and is the overriding consideration in relation to development proposals. Policy GE10 states that Green Corridors and Links will be protected from development that would detract from the green an open character or would cause serious ecological damage.

The sites lies within the Strategic Green Network (SGN) as set out in the Core Strategy, policy CS 73 requires that SGN's are maintained and where possible enhanced flowing the rivers of ...'Loxley'.

Loxley Valley Design Statement – October 2003 supplements the UDP policies in terms of landscape and design for proposals in the Loxley Valley and is a material planning consideration, although limited weight is attached due to the age of the statement it does set out the special landscape merits of the valley.

The proposal encroaches into the protected woodland to the south east of the site and as such concerns have been raised by the Council's Landscape Officer. There are number of protected trees on the site subject to a TPO. Whilst the proposal offers opportunities in terms of management, maintenance and enhancement of the woodland this is at the loss of a significantly important part of the woodland, which is considered unacceptable from both a tree protection and landscape view to also the impact on habitat in this particular location. This is contrary to policies CS73 (Strategic Green Network), GE8 (Areas of High Landscape Value), GE10 (Green Network).

Natural England have raised no objection based on the information submitted on the basis that the proposed development would not have a 'significant adverse' impact on protected landscapes. The proposal would not compromise the purposes of the designation or special qualities of the protected landscape of the Peak District National Park. The site is within an area which Natural England considers would benefit from green infrastructure (GI).

Multi-functional GI can perform a range of functions including managing flood risk management, accessible green spaces, climate change and biodiversity and this site has the potential be designed to maximise the benefits.

The indicative details include opportunities to include GI in the scheme showing a Green Corridor integrated into the landscape with accessible footpaths and cycle networks. The Green Corridor has the potential to provide additional benefits to the local community and an opportunity to retain and enhance the existing ecological habitats and movement corridors for wildlife. Benefits suggested also include the creation of woodland play and picnic areas. Whilst these appear attractive in principle, they lack natural surveillance and connection with the housing layout. Further extensive work would be required in bringing forward a detailed scheme for GI.

Whilst the principles are there, limited weight can be attached to Green Infrastructure benefits based on the level of detail supplied.

Pollution

Saved policies GE23 (Air Pollution), GE24 Noise Pollution, GE 25 (Contaminated Land) and GE26 (Water quality of waterways) of the UDP and policy CS 66 (Air Quality) set out the Council's considerations in respect of pollution.

In line with paragraph 170 e) and f) of the NPPF, planning decisions should contribute to and enhance the natural and local environment by preventing new development from contributing towards, being put at unacceptable risk from or affected by unacceptable levels of pollution.

As stated previously, the site accommodated a former industrial use and involves the demolition and redevelopment for housing; as such the Environmental Impact Assessment has taken account of potential sources of pollution.

The Council's Environmental Protection Service (EPS) have been consulted and offered advice on the assessments, suitability for development and necessary mitigation measures.

EPS officers have advised that without a clear plan and description of the works it is not possible to fully assess the impacts and recommend conditions that would pass the tests set out in the NPPF. It is not clear from the information provided what works of demolition, clearance, ground preparation (including remediation) or other enabling works that would be required in connection with the application and the redevelopment of the site.

The supporting information within the application makes reference to a Construction Environmental Management Plan (CEMP) that would be necessary to manage environmental impacts such as noise, air quality, dust, transport and access and ground conditions, however, elements such as noise has been scoped out of the Environmental Statement (ES) and no CEMP has been submitted for consideration.

It is on this basis that, insufficient information has been submitted for your officers to adequately assess the environmental impacts of the re-development of the site.

Noise

A noise report has been submitted; however the EPS team advises that it is insufficient to fully assess the impact of the construction phase. It contains details of potential noise impact on potential occupiers of the site from sources such as the water treatment plant and concludes that environmental noise is assessed as being low or not a constraining factor. The impact and mitigation of on-site noise sources has not been assessed.

Concerns raised by interested parties with regards to impact during the construction phase or occupancy cannot be fully assessed due to a lack of detailed assessment.

Dust

The ES assesses the impact of dust emissions and local impacts; risks are identified during demolition, earthworks, construction and 'track out' which refers to movement of dust and dirt onto the public road network. It has been identified that there would be potential harm to annoyance from nuisance or disamenity, harm to ecology and human health impacts.

The CEMP would need to fully address the additional risk in relation to soil and waste management and dust control.

Ground Conditions

The ES considers ground conditions and phase I and phase II Geo-environmental Site Assessments have been submitted.

Again, the EPS team advise that the information submitted provides an overview of the history of the site but is insufficient as specific environmental information is omitted.

Air Quality

UDP Policies GE22 and GE23 relating to pollution and air quality seek to ensure development is sited so as to prevent or minimise the effect of pollution on neighbouring land uses or the quality of the environment and people's appreciation of it. Core Strategy Policy CS66 promotes action to protect air quality.

Policies GE22, GE23 and CS66 are consistent with the NPPF and can be afforded significant weight.

NPPF paragraph 170 also seeks to prevent new and existing development from contributing to, being a risk from, or being adversely affected by, unacceptable levels, amongst other matters, of air pollution.

The site is located within the Sheffield city-wide Air Quality Management Area for exceedances of nitrogen dioxide and particulate matter.

The Air Quality chapter of the Environmental Statement assessed the impact of the development in terms of air quality impacts during the construction and operational phases.

The impact on air quality is most likely to arise from dust emissions and road traffic exhaust emissions during construction and road traffic emissions during the operational phase.

The report recommends mitigation measures to ensure that good practice dust control measures are implemented and as such the potential air quality effects in relation to construction activities have been predicted as negligible and as such considered not to be significant.

In terms of the operational phase (occupation) the results of modelling work undertaken in relation to the assessment of Nitrogen Dioxide (NO₂) and Fine Particulate Matter (PM₁₀) dust was classified as negligible.

Overall the assessment concludes that the overall effects on air quality are considered not to be significant when taking account of proposed mitigation measures which could be included in a Construction Environmental Management Plan secured by condition.

Conclusion to natural environment issues

The EIA has concluded that there are a number of statutory designated sites within 10 km of the site boundary. The proposal would have a negative impact on both Stannington Ruffs SSSI via the River Loxley due to dust and water quality both surface and ground water. However, based on proposed mitigation, it is deemed that there will be a 'negligible' impact based on proposed mitigation.

The information submitted does not enable the pollution issues such as, contaminated land, water pollution, ground stability, dust and noise to be fully considered and for potential mitigation measures to be considered.

Significant weight is attached to the potential harm on the natural environment and the health impacts of residents in the locality and potential occupiers of the site. It is on this basis that it is concluded that insufficient and inaccurate information has been submitted.

HERITAGE IMPACT

Section 16 of the NPPF relates to 'conserving and enhancing the historic environment' and acknowledges that heritage assets are wide-ranging and irreplaceable resources that should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

Policy CS 74 (Design Principles) of the Core strategy require that high quality development is expected to take account of the topography river corridors, landforms, views and vistas, townscape and landscape character and the distinctive heritage of the city.

Impact on Archaeology

Saved policies BE15 (Areas of historic interest), GE13 (Areas of natural history interest) and BE22 (Archaeological sites) of the UDP consider the importance of Sheffield's historic interest and seek to ensure that archaeological interest is preserved, protected and enhanced. Where disturbance is unavoidable adequate records should provide of the site and where found remains are preserved in their original position.

Representations made by interested parties, including South Yorkshire Archaeology Service (SYAS) highlight the historic importance of the site and the potential to preserve and incorporate the special interest of the site into the development proposals.

The Archaeology and Heritage chapter of the ES considers the historic importance of both the archaeology and built heritage of the site along with designated heritage features in the vicinity of the area and is informed by a Heritage Appraisal.

The ES sets out criteria for assessing the magnitude of change in relation to historic environment receptors which ranges from major adverse impact to major beneficial impact which depends upon the condition of the asset and its value and significance.

A Desk Based Assessment of the land and Loxley Valley inform the ES.

The outcomes of the assessments conclude that whilst there are assets of local historic importance there are no local archaeological sites due to the wooded and we nature of the site which meant that settlement activity took place elsewhere.

Remediation works largely involved in removing areas of contaminated land along with construction activity has the potential to damage or destroy any archaeological unidentified deposits. The sensitivity of any surviving buried deposits are likely to range from low to medium depending on the change from previous development have been affected by the previous development.

The proposed development is likely to result in a fundamental change to the historic landscape character from industrial to residential. It has been demonstrated that there is no opportunity of reinstating the industrial heritage of the site in the future and the majority of the industrial heritage of the site is mostly limited to the derelict metal buildings.

A number of the historic buildings and structures identified, such as the Old Loxley Mill pond and other water management systems are to be retained and fall outside of the development footprint.

The industrial historic landscape will result in a change from industry to residential but this is seen to be mitigated by the retention of the majority of the woodland, landscape and water features and the historic buildings of permanent construction. Retained buildings are to be renovated and offered for alternative uses to support the new community and preserve them for the future.

SYAS advise that a full building recording of buildings on site is necessary prior to demolition works along with a programme of site investigation and recording to be agreed with the Council. As the application is for outline permission and no details other than access are provided a heritage impact assessment is required to support further detailed reserved matters applications.

Conclusion to heritage impacts

On balance, whilst the site has local historic interest there are no above or below ground archaeological or heritage features that would preclude development of the site therefore little weight is attached to the heritage significance. The retention of some of the buildings of permanent construction is welcomed and mitigation measures secured by conditions would ensure that any unknown features can be recorded and taken account of in the reserved matters detailed designs and layouts for the site.

Design Proposals

UDP Policies BE5 (Building Design and Siting) and Core Strategy Policy CS74 (Design Principles) all seek high quality design that aims to take advantage of and enhance the distinctive features of the city, its districts and neighbourhoods. South Yorkshire Residential Design Guide (SYRD) sets out the key design principles for housing developments.

The government attaches significant weight to the creation of high quality buildings and places. Good design is a key aspect of sustainable development. Paragraph 12 of the NPPF sets out that planning decisions should ensure that developments will:

- Function well, adding to the quality of the area;
- Be visually attractive in terms of architecture, layout and landscaping;
- Sympathetic to local character and history;
- Establish a strong sense of place for people to work, live and visit;
- Sustain an appropriate amount and mix of development including transport networks and green spaces; and
- Create safe, inclusive and accessible places

The application is accompanied by a detailed Design and Access Statement, Illustrative Master Plan and Parameter Plans.

Design and Access Statement

Design and Access Statements (DAS) are required for major applications and set out a framework for applicants to explain that the proposal is a suitable response to the site and its setting along with access considerations for prospective users.

A detailed and thorough DAS has been compiled incorporating the recognised constraints and established parameters.

The Council's Urban Design Team have reviewed the DAS and design proposals and conclude that the scheme has some key elements that require attention and detailed design elements are necessary to achieve a satisfactory scheme. South Yorkshire Police have also commented that developments should be built to secured by design standards as a 'close knit development of this nature is likely to attract unwanted attention from criminal elements'. Paragraph 95 places importance of promoting public safety in the layout and design of developments.

The proposed development would essentially establish a self-contained settlement of up to 300 properties which is constrained and has significant design considerations due to the nature of the landscape and the surrounding topography.

The key design considerations are identified below:

- The proposal should demonstrate that it responds sensitively to its surroundings and clearly belongs in the local environment.
- It establishes a sense of place that involves a hierarchy of routes, buildings and forms sub-areas if distinctive character.
- Consideration of scale, enclosure, building form, orientation, materials, circulation, views, incorporation of existing features and landscape.

Much of these key considerations are included in the DAS in a positive and convincing manner, which set out a vision to transform the derelict site to a lively social place, where people can live work and play and include the following key areas:

- Local context and Local Character
- Transport and Movement
- Socio Economics
- Blue and Green Infrastructure
- Sustainability and Vision
- Design Strategy
- Masterplan evolution
- Community Consultation
- Ecology and Tree Strategy
- Flood Alleviation Strategy
- Reuse and Waste Strategy
- Parking Strategy
- Character Areas
- Height and Massing
- Access and Land Use

- Demolition

The DAS provides a well-designed framework for the potential of the site however, as this is an outline planning application, with all matters reserved other than access, little security can be provided to ensure that the resultant development will follow the principles set out in the DAS.

Illustrative Master Plan

The Illustrative Master Plan demonstrates that a good quality housing proposal could be delivered on the site, one based on the sound principles of the DAS, it is purely illustrative and officers are concerned that there is no security that the eventual scheme will resemble the master plan or the DAS.

Parameter Plans

The application is accompanied by a set of parameter plans. An application of this scale would be expected to include a design code of a set of design principles for future reserved matters applications along with parameter plans which in this instance are more indicative than expected.

Conclusion to Design Proposals

In order to give confidence to the design proposals the overall approach needs to be re-considered to provide sufficient assurance to officers and interested parties over the proposal. The current scheme as presented lacks in detail and as such little weight can be attached to the quality of buildings and place which is fundamental to the re-development of this important, publicly sensitive site.

In terms of residential amenity, as the site layout is indicative there has been no consideration of the impact on residential amenity in respect of the layout or impact on the existing properties to be retained. The site is also a significant distance from other residential properties, other potential impacts on amenity of residents in the locality have been considered in the relevant sections of this report.

Paragraph 130 of the NPPF states that planning permission should be refused for development of poor design that fails to take opportunities for improving character and quality of an area and the way it functions. LPA's should seek to ensure that the quality of approved development is not marginally diminished between permission and completion. In this case there is insufficient level of detail to ensure that this won't be the case.

Public Art

UDP Policy BE12 (Public Art) states that the provision of public art in places which can be readily seen by the public will be encouraged as an integral part of the design of major developments.

No public art proposals have been submitted with the application however, there is potential to include public art which represents this history of the site and makes

features of the retained buildings and structures. As this is an outline application, details relation to public art proposal are generally considered at reserved matters stage and conditioned on any approval.

Open Space

Saved policies LR4 (Open Space) of the UDP requires the creation of open space where needed, H15 (Design of New Housing Developments), H16 (Open Space in New Housing Developments) requires sites over 1 ha to provide laid out open space and chapter 8 – promoting healthy and safe communities states that planning decisions should aim to achieve healthy, inclusive and safe places by providing quality public space and accessible green infrastructure.

Sport England have commented on the application stating that it is estimated that the development will result in a population of 690 and will generate a demand for additional sports facilities, which transfers to a financial figure of around £263,315. Sport England advises that there is a need for the site to contribute towards sport either through on site or off-site provisions should planning permission be approved.

The application offers opportunities to apply ten active design principles as part of the development and secure a well-designed, attractive and healthy place by creating a walkable community, connected walking and cycling routes, a network of multifunctional open space and with quality streets and open spaces. Sport England raise no objections to the proposal in principle.

The site is surrounded by mature woodland and various public rights of way which connect the site to a variety of green infrastructure. A new play area is proposed to the north-west area of the site close to the main entrance on Storrs Bridge Lane, along with a variety of un-developed green space with potential for connected green infrastructure and ecology led landscaping. The existing bowling green is to be retained, the woodland is to be managed and woodland picnic and play areas proposed.

These are all welcomed features that can support healthy lifestyles and connected green infrastructure, however, these again are illustrative details with no design details or full consideration to the impact.

On this basis it is considered that little weight can be attached to the contribution the development would make to retaining and enhancing open space and green infrastructure as part of the proposal.

Education

Policy CS 43 (Schools) sets out that sufficient modernised education facilities will include the expansion of schools to be funded by developers where there is insufficient local space for demand arising from new housing developments.

The Community Infrastructure Levy (CIL) and Planning Obligations Supplementary Planning Document (SPD) Dec 2015 says that since the implementation of CIL contributions, providing additional school accommodation will now normally be

funded through CIL. However there may be circumstances where a Section 106 (S106) Planning Obligation is required, for example where a major residential development is proposed. This is defined as 500+ for primary provision and 1000+ for secondary provision.

It should be noted that, since the SPD was adopted in 2015, there have been changes to the CIL Regulations, a new National Planning Policy Framework (NPPF), new non statutory DfE Guidance on securing developer contributions for education and new National Planning Practice Guidance on planning obligations. These new policies and regulations impact on how the SPD guidelines should be applied. A major change is that the CIL Regulations have removed restrictions on the use of S106 and CIL for the same item or type of infrastructure.

This is in order to encourage more S106 agreements where they are appropriate and justified in order to mitigate the impacts of development. CIL funding decisions are completely separate from planning decisions so there can be no guarantee, when granting planning permission, that CIL funding will be available to deliver any of the infrastructure necessary to support the proposed development. The new CIL Regulations also deleted the 'Regulation 123 List' of CIL spending priorities referred to in the SPD, so the Council has no agreed priorities for CIL spending. The School Organisation Team would need to bid for funds from the CIL pot where there are anticipated shortfalls in provision across the city. It is for the Council corporately to determine what the priorities for funding are.

Paragraph 92 of the NPPF states that planning decisions should plan positively for local services and take into account local strategies to improve health, social and cultural wellbeing for all sections of the community. Paragraph 94 states that it is important that there is a sufficient supply of school places available to meet the needs of the existing and new communities.

The Council's Education Team have advised that there is a demonstrated need for school places and that the development would have a significant impact on school places in the locality.

The site is within the catchment boundary of Loxley Infant and Junior School and Bradfield Secondary School. The housing types are not known as this point in time as such an assumption has been made as two or more bedrooms. Based on a yield calculation of 3 pupils per year group from every 100 properties the expected pupil yield for the development would be around 9 pupils per year group, amounting to 63 for primary and 45 for secondary.

Primary School

Loxley Infant and Junior School is full in all year groups and forecasts show that the school will continue to fill or be oversubscribed with the exception of the academic year 2021/22. The development would therefore exacerbate the shortage of provision locally.

The site borders the catchment area for Bradfield/Dungworth School which is forecast to continue to be full/oversubscribed.

Stannington Infant/Nook Lane Junior School are also full.

Due to the rural nature it is expected that pupils would be accommodated locally in one of these schools.

Therefore, there is limited capacity locally in which to accommodate pupils yielded from the development. A shortage of locally available places is of concern and expansion of one or more of the primary schools will be necessary.

Secondary School

Bradfield School is currently full in all years and has recently expanded its admissions from 180 to 210. Forecasts show the school is likely to continue to fill/be oversubscribed in some years. The development will therefore exacerbate the shortage of provision locally.

Neighbourhood schools in the planning area show that they will be oversubscribed in 2023/24 and unable to accommodate the pupils yielded from this development in a number of years.

Other developments in progress or seeking planning approval will also impact upon secondary school places. Taking account of the cumulative impact this would lead to further pressure on schools in this area and the need for expansion.

Conclusion to Education

It has been concluded that there is a lack of capacity in local schools both at primary and secondary level. The proposed development will exacerbate this situation.

The NPPF in paragraph 94 states that it is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Great weight should be given to the need to create, expand or alter schools through decisions.

Core Strategy policy CS43 Schools requires contributions towards education provision where there is insufficient local capacity for demand arising from new housing developments

The Council's procedures contained in the Community Infrastructure Levy and Planning Obligation SPD 2015 Policy GE1 of the SPD requires developments of 500 houses or more to contribute toward primary school places provision in the form of a physical extension to an existing school in the local area and developments of 1000 dwellings to contribute towards Secondary/Sixth form provision in the form of a physical extension to an existing school in the local area.

The proposal indicatively results in less than 500 dwellings and as such, the expansion of school places is expected to be funded through CIL.

Retail Impact

Policy CS 14 (City-wide distribution of Shopping and Leisure Development) of the Core Strategy and paragraph 85 (Town Centre uses) set out the hierarchy for the delivery of town centre uses to protect the vitality of town centres. Retail and office uses are defined as 'town centre' uses and as such should be steered to town/city centres.

The proposal includes the re-use of the retained buildings for local facilities/offices whilst no details have been provided for the resultant use of the buildings they include two mixed use community hubs that could potentially include a small shop, café or bike hire centre. The buildings measure around 740.7 m² GIA and 386.2 m² GIA totalling 1,130 m² GIA of 'main town centre use' which does not meet with the threshold of 2,500 m² of retail impact assessment as set out in the NPPF.

Paragraph 88 of the NPPF states that that the sequential approach to steering main town centre uses towards town centres does not apply to applications of small-scale rural offices or other small scale rural development.

Due to the scale and nature of the uses proposed they are considered to be small scale and unlikely to impact on the retail function of the established centres, the provision will provide a flexible space for potential uses that would support the community. On balance it is considered that the changes of use of the building as are acceptable in principle, further details in the reserved matters application would be required to deliver final details with regards to alterations, internal and external layout and any parking or advertisements/shop fronts required.

This, however, does not outweigh the concerns raised above in relation to whether these uses will actually be delivered to provide local facilities.

Sustainability

The National Planning Policy Framework advises that there is a presumption in favour of sustainable development. This comprises of three dimensions which must be considered together, (paragraph 8) these are an economic role, a social role and an environmental role.

A Sustainability Assessment has been provided and sets out key elements which the applicant considers makes the proposal sustainable which include the following:

- A regular bus service to link the site with wider services and locations
- Travel plan to encourage alternative means of transport
- New walking and cycling routes to improve connectivity
- Streets that maintain low vehicle speeds
- Adequate space for parking and not dominated by cars
- Provision of private and communal electric vehicle charging points
- Community home working, recreation and leisure activities to encourage residents to lead an active life
- Mix of play areas
- Mix of uses
- Green and Blue Infrastructure

- Dual aspect homes to provide daylight and natural ventilation
- Retain and enhance the woodland, develop woodland management plan
- Development of appropriate height, location of uses and street dimensions to avoid unwanted micro-climate impacts
- Protect and enhance habitats and wildlife connectivity
- Landscape enhancements
- Re-development of contaminated brownfield site

The key elements are welcomed, however, on the basis that the proposal is in outline form with illustrative details, means that there is no certainty that the majority of the key elements that would make the proposal sustainable would be delivered in an eventual scheme.

Economic

Paragraph 8 of the NPPF states that the economic objective is to help to build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right place at the right time to support economic growth, innovation and improved productivity; and by identifying and co-ordinating the provision of infrastructure.

The planning statement suggests:

The generation of 153 direct and indirect jobs during the 5-year build period with a GVA of around £8.9m per year.

The development will support a number of other off-site employment opportunities in the building trade from suppliers of material to technical and professional staff.

The additional residents will increase the labour supply and bring additional spend to Sheffield.

Delivery of financial benefits to the Council through the New Homes Bonus and Council Tax system.

It is anticipated that the proposal will deliver short term economic benefit in the form of employment during the construction phase and on a wider level, additional housing will increase spending in the borough.

The economic benefit of the proposal is considered to be slight and afforded only limited weight and as such does not weigh in favour of the development based on the overall harm and uncertainty of other material planning considerations to deliver a high quality development that creates a new sustainable community along with the environmental mitigation requirements, long term commitment to sustainable transport measures and the necessary planning obligations.

Social

Paragraph 8 b) of the NPPF states that to be sustainable development socially the proposal should support strong, vibrant and healthy communities, by ensuring that a

sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.

The site has the potential' to deliver a healthy community, meeting different types of housing needed and create a sense of place.

The proposal has the 'potential' to create well design and safe built environment with open spaces that reflects current and future need supporting the health and social wellbeing of potential occupiers.

The proposal would result in noise and disturbance during the construction phase, however, this would be short term when considered against the lifetime of the development.

The proposal would have a significant impact on local facilities such as school places and would not be well served by local facilities within easy reach of the site on foot taking account of the location and topography.

It is on concluded that, whilst the development has the potential to deliver a vibrant new community it has not been adequately demonstrated that development can be achieved on site without having an unacceptable social impact and longer term social cohesion which weighs heavily against the proposal.

Environmental

Paragraph 108 c) of the NPPF stats that proposal should seek to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

The proposal results in significant shortfalls in necessary information and details to demonstrate that the following environmental aspects are protected and enhanced:

Habitats and biodiversity – in accurate and out of date information

Trees – Loss of historic woodland

Wider sustainability benefits with regards to flooding – insufficient information

Pollution, ground conditions and contaminated land - insufficient information

Making effective use of land – development of greenfield parts of the site

Design – insufficient information

And of most importance, the proposal will result in harm to the openness of the Green Belt and the visual and spatial impact on the special character of Loxley Valley.

Overall, the proposal is considered to balance negatively in relation to environmental matters and this weighs heavily against the proposal carrying significant weight.

PLANNING OBLIGATIONS

Paragraph 56 of the NPPF states that planning obligations must only be sought where they meet all of the following tests:

- a) necessary to make the development acceptable in planning terms;
- b) directly related to the development; and
- c) fairly and reasonably related in scale and kind to the development.

Community Infrastructure Levy (CIL)

The Community Infrastructure Levy (CIL) is a planning charge introduced by the Planning Act 2008, to deliver infrastructure support to the Sheffield Area.

In accordance with the adopted CIL and Planning Obligations SPD the development is CIL liable and if approved would result in the charge will be £30 per square metre (plus indexation since 2015), 15% of CIL receipts are to be passed on to Bradfield Parish Council.

Affordable Housing

Core Strategy Policy CS 40 (Affordable Housing) states that, in all parts of the city, new housing developments will be required to contribute towards the provision of affordable housing where practicable and financially viable.

The proposal is within the Peak District Fringe Housing Market Area and as such 10% affordable housing contribution is required. This would need to be secured via a legal agreement should permission be granted for the development.

RESPONSE TO REPRESENTATIONS

For projects listed in Schedule 2 of the Environmental Impact Regulations the Local Planning Authority should consider whether it is likely to have significant effects on the environment and therefore whether an Environmental Impact Statement is required. Housing development is an Infrastructure Project and the applicable thresholds are (i) development over 150 houses; or (ii) the overall area of the development exceeds 5 hectares. The site exceeds 5 hectares and is likely to accommodate over 150 houses.

The selection criteria for screening Schedule 2 development includes (i) the characteristics of development; (ii) location of development and; (iii) types and characteristics of the potential impact. The size of the development exceeds the thresholds; however, the applicant chose to undertake the ES without screening or formal scoping with the LPA.

It is noted that there is support for the proposal in terms of the re-use of the site for housing and the potential benefits but on balance it is considered that the level of support is outweighed significantly when taking account of the public interest as a whole. The Council can demonstrate a 5.1 year housing land supply and as such there is no pressing need re-use of the site for housing and there are no significant benefits in terms of remediation that are imminently required in relation to potential

pollution or wildlife protection. Remediation measures are only required in connection with the development of the land for housing.

There has been overwhelming objection to the application from interested parties; the majority of which are from local residents and local groups as set out above. Some interested parties appreciate the need to re-use land in the interest of providing homes, however, many feel that the proposal lacks detail, is overdevelopment and in an unsustainable location that would put pressure on local services. Objectors also feel that the development as presented would have an adverse effect on the landscape character of Loxley Valley.

Representations highlight insufficient information with regards to impact on ecology and habitat, archaeology, flooding and contaminated land. This aligns with concerns raised by the Council's specialist's advice.

It has been argued that the applicant should provide a net biodiversity enhancement of 10% in accordance with Government guidance. Paragraph 170 of the NPPF says that planning decisions should contribute to and enhance the local environment by minimising impacts and providing net gains in bio-diversity. The Government response to 'Biodiversity net gain and local nature recovery strategies; impact assessment' 2019 says that legislation will require development to achieve a 10% net gain for biodiversity which will be brought forward in the Environment Bill. The Environment Bill was put before Parliament in January 2020 and put in abeyance due to Covid19 in early March 2020. The latest version of the Bill includes provisions that grants of planning permission in England be subject to a condition to secure that the biodiversity gain objective is met. This is defined in the Bill as a 10% gain. Whilst this is not yet legislation the applicant the LPA considers that due to the nature and location of the site a 10% net gain should be demonstrated.

A number of representations have commented that the housing should be designed to higher sustainability standards. The Government's Housing Standards review produced in 2015 reduced the different technical standards that could be applied by Local Authorities. In the absence of an up to date Local Plan the technical standards for sustainable housing design are now taken forward through the building regulations. Whilst more sustainable housing design can be encouraged Sheffield cannot insist on higher design standards than the building regulations at the present time.

A number of representations have commented that the development should include energy efficient homes and sustainable design measures.

The Climate Change and Design Supplementary Planning Document and Practice Guide 2011 supports policies CS63 (Response to Climate Change), CS64 (Climate Change, Resources and Sustainable Design of Developments, CS65 (Renewable Energy and Carbon Reduction), CS66 (Air Quality) and CS67 (Flood Risk Management) in promoting measures within design to address climate change. The application makes reference to sustainability measures however, in outline form it is not certain that an eventual scheme is viable to delivery such measures.

Representations comment on the importance of the area to walkers and cyclists, as the scheme is indicative it is not possible to assess the full impact on definitive public rights of way.

Officers consider that the content of this report has assessed all the information submitted and the issues raised by interested parties and as a whole the recommendation has taken account of the matters raised by representations.

Officers have placed considerable weight on the protection of the openness of the Green Belt and the inconclusive information with regards to the impact on trees, ecology, landscape and pollution.

SUMMARY AND RECOMMENDATION

Planning Issues

The site is located within Green Belt as defined by the Sheffield UDP 1998. Development for housing in the Green Belt by its very nature is deemed as inappropriate.

The NPPF promotes the re-use of previously developed land for housing which:

- Involves the partial or complete re-development of previously developed land in the Green Belt (para 145 g), which would not have a greater impact on the openness of the Green Belt than the existing development; or

Your officers conclude that there are areas of the site proposed for development that are not previously developed and that the development for housing would have a greater impact on the openness of the Green Belt due to the scale, nature and level of activity associated with this residential development. Parts of the existing development, whilst consisting of buildings of large footprints and large amount of hard surfacing has returned to nature and blended into the landscape.

- Would 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.

Your officers conclude that there would be substantial harm to the openness as set out above without any demonstrated identified housing need being met.

Most Important Policies and Tilted Balance

Paragraph 11 of the NPPF says that plans and decisions should apply a presumption in favour of sustainable development. For decision-taking this means:

- c) approving development proposals that accord with an up-to-date development plan without delay; or

- d) where there are no relevant development plan policies, or where the policies which are most important for determining the application are out of date, granting permission unless:
- i) the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the proposed development.
 - ii) any adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

Taking account of the proposal for housing development in the Green Belt and the sensitive environmental nature of the site the most up to date policies are the housing policies within the Core Strategy and paragraph 145 g of the NPPF.

Paragraph 11d)i. states that the application of policies in the framework that protect areas (Green Belt) provides a clear reason for refusing the development as proposed.

Overall Planning Balance and Conclusion

In accordance with Paragraph 11 of the NPPF (2019) the proposal is not considered to be sustainable development. Despite the significant weight the Government attaches to the re-use of a part previously developed site for housing, the proposal would have a harmful impact on the openness of the Green Belt, to which substantial weight has been attached. It is also concluded that the development would be unsustainable due to a lack of local facilities to serve the new community, to which considerable weight has been attached.

Assessment of the impact on openness of the Green Belt has considered both the visual and spatial impact of the proposal. Due to the nature of the proposal for the construction of up to 300 houses; with an absence of full details it has been concluded that the site in areas has blended into the landscape and as such a residential development of the nature proposed along with the associated infrastructure would have a greater spatial impact. Whilst a LVIA has been submitted, it is lacking in detail to fully assess the overall visual impact on openness beyond the site.

Limited weight has been attached to the delivery of housing on this part previously developed site on the basis that the Council can demonstrate a deliverable housing land supply of more than 5 years. There is no evidence to suggest that the site is currently posing an imminent risk to the environment or to the public in favour of remediating and developing the site at this particular time.

Insufficient information has been supplied to adequately assess the environmental impact of the development along with the deliverability and viability of a policy compliant scheme for which considerable weight has been attached.

The applicant has inferred a commitment to delivering a policy compliant scheme in terms of affordable housing; however, insufficient information has been submitted with regards affordable housing.

Whilst the Flood Risk Assessment demonstrates the development can be made safe for a lifetime and the Sequential Test has been passed on the basis that there are no comparable sites in lower flood zones, the proposal fails the exception test with regards to demonstrating that the development will deliver wider sustainability benefits to the community that would outweigh the flood risk. For which considerable weight has been attached.

Submitted information in relation to design demonstrates that the site has potential to deliver a high quality housing environment and energy efficient homes; however, limited weight has been attached to this on the basis that the details are illustrative and not supported by a viability assessment to demonstrate that such a scheme would be deliverable.

The Transport Assessment shows that the proposal would not have a severe residual impact on the road network and there are no concerns with regards to the impact on highway safety particularly considering the proposed mitigation measures which weighs modestly in favour of the proposal on the basis that there is no evidence to suggest that the mitigations measures can be viably delivered.

There would be some benefits arising from the proposal including short term job creation during construction, re-use of previously developed parts of the site, potential habitat management, retention and re-use of buildings and potential to preserve enhance the asset of history, however these material considerations do not outweigh the fact that the proposal is contrary to the Development Plan and National Planning Policy.

In relation to paragraph 11 of the NPPF, the most important policies in the determination of this application, which in this case revolve around the impact on the openness of the Green Belt, when considered align on the whole with the NPPF and as such paragraph 11 (d) does not apply.

RECOMMENDATION

For the above reasons it is recommended that Planning Permission be REFUSED for the listed reasons.