

**BY POST AND EMAIL**

9 October 2019

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Dear Mr Baxter,

**19/03143/FUL: Land Off Moorthorpe Way Sheffield S20 6PD**

I am writing on behalf of the South Yorkshire branch of the Campaign to Protect Rural England (CPRE SY). We are an independent charity with over 1100 supporters and are part of national CPRE, the countryside charity. Our vision is for a beautiful and thriving countryside that enriches all our lives. We are working for an efficient use of land, particularly in urban and suburban areas, and more land dedicated to green space and nature.

We have examined the above application and, in summary, object on the grounds of failing to make efficient use of land and also not contributing sufficiently to the need for low carbon development and place-making. We also believe the application is premature both in relation to pre-figuring the emergence of the draft Local Plan and the need to 'master plan' the whole site (Sites E, C and D).

However, we do not object to the principle of development at the site and suggest the scheme be amended, in part through a master planning exercise, to broadly:

1. a smaller footprint but significantly denser residential scheme, close to the road way and doctor's surgery, with an enhanced design to encourage active modes of travel;
2. all homes should be very low carbon (preferably Passivhaus or equivalent);
3. a larger area of the site left undeveloped for public amenity, particularly focusing on the use, enhancement and connectivity of the woodland and other green space and biodiversity assets;
4. any mature trees lost to be replaced by three young ones, to address loss of carbon sequestration and related biodiversity benefits.

*Background*

The site was allocated in the UDP (1998) and is a proposed allocation in the defunct Sites and Policies DPD (2011). We do not know if it is a proposed allocation

**President: Dame Fiona Reynolds**

CPRE South Yorkshire and Friends of the Peak District are run by the Campaign to Protect Rural England, Peak District and South Yorkshire  
**for the countryside, for communities, for the future**

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in a forthcoming Plan but assume that it is likely to be. The only reasons we foresee for non-inclusion is either:

- because it no longer fits the spatial strategy; or
- because it has acquired additional ecological value in the meantime which cannot be mitigated in development.

In short, the principle of some development being acceptable on the site is fairly well-established. The specification for development is also given in the Design Brief<sup>1</sup>, which we have examined. **However, we have a strong preference that development at the site be subject to alignment with the emerging policies/spatial strategies of the draft Local Plan and a proper 'master planning' exercise that fully engages the local community and other interested parties, such as ourselves.**

#### *Policy perspective/green space and biodiversity assets*

However, in legal terms, this is a full application which doesn't rely on the Local Plan status to justify itself - with the old Plans out-of-date and no new Plan forthcoming, the acceptability can be judged on its own merits, with the revised National Planning Policy Framework (2019) as an important material consideration.

NPPF para 123 states:

*123. Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances:*

*(a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate;*

*(b) the use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range; and*

*(c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).*

The proposed density is an unacceptably low 25dph (though it's not clear if this is gross or net), whereas for a site close to the tram we suggest it must be at least 50dph (the Design and Planning Brief, p.12, suggests between 40-60 dph). **The current density, whether net or gross, is failing to make efficient use of land and should therefore be refused.**

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<sup>1</sup> 'Housing Sites (C,D,E), Moorthorpe Way, Owlthorpe: Planning and Design Brief' Sheffield City Council/ Planning Delivery Service (July 2014).

However, NPPF para 118 says:

*118. Planning policies and decisions should:*

*(a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains - such as developments that would enable new habitat creation or improve public access to the countryside;*

*(b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;*

NPPF 170(d):

*(d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*

and NPPF 148:

*the planning system should...help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience*

In this context what we have is a site that is partially surrounded by woodland (ancient to the north, other to the south and west), with a substantial quantity of mature trees on the site. There are also other potentially valuable habitats on site and the preliminary ecological assessment acknowledges a great deal more survey work is needed. **We concur with the comments of the Sheffield and Rotherham Wildlife Trust that further surveys are required before permission can be considered.** If the overall site allocations are considered together, which we think would be beneficial, then a full environmental impact assessment (EIA) would be required.

The site is in the process of succession and becoming part of the woodland environment that surrounds it; any new development should not break the connections between the ancient woodland and adjacent woodland. Mature trees are storing carbon and will continue to capture carbon if they are left undisturbed. Good practice is now that if a mature tree is lost then it should be replaced by three young ones.

*Site layout and design; mix of tenure; low carbon considerations*

In addition to the poor density, the layout of the site is far too focused on car travel, including space wasted on private car parking for each residence. The site layout does not encourage active travel - walking and cycling and using such modes to access local public transport. We support the provision of affordable housing but are concerned that the current layout does not enable the affordable homes to integrate seamlessly.

We should also take the view, in light of NPPF148 and the increased imperative for climate action, that all new homes should be built to Passivhaus or equivalent standards. It is unacceptable that a development, with a lifetime well beyond when radical carbon reduction targets must be met by law, can be allowed with

such low energy and sustainability standards. Building to near-zero carbon standards now has a low build-cost differential, low running costs (for the purchaser, so the costs can be readily passed on) and also contributes to the avoidance of fuel poverty and future retrofit requirements which are likely to be costly. If nothing else, the sustainability guidance in the Design and Planning Brief (see p.22-23, which is based on Policies CS64, CS65 and guideline CC1 in the Climate Change and Design SPD) appears to be wholly ignored in the specification of the house types proposed.

Please notify us of your decision in due course

Yours sincerely,

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Head of Campaigns

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