



Statement to the inquiry - CPRE South Yorkshire

1. I am Andy Tickle, head of campaigns at CPRE South Yorkshire. I have an honours degree in Botany from the University of Sheffield and a PhD in plant ecology from Imperial College, London. I have worked as an environmental campaigner, academic and policy consultant since 1988 and on town and country planning and campaign issues for CPRE in Sheffield from 2002. I have been authorized by our charity's Board of Trustees to make a statement on behalf of the organisation.
2. We refer to our previous representations (objections) to Sheffield City Council, dated 9 October 2019 and 13 February which, in summary, cited the grounds of i) failing to make efficient use of land; ii) not contributing sufficiently to the need for low carbon development and place-making; and iii) prematurity both in relation to the emerging Local Plan and the need for an up-to-date masterplan for sites C, D and E. For the most part, points i) and iii) align with main issues D and B respectively. Point ii) has now been elucidated further by the rule 6 party (the Owlthorpe Fields Action Group, hereafter OAG), whose evidence we support.
3. We have stated previously, notably in our objection letter of 9 October 2019, that we do not object to the principle of development at the site, a point also helpfully pointed out in Mr Bolton's proof of evidence (at paragraphs 5.25 and 5.36). Mr Bolton also makes a lengthy case (see his section 5 A) points (i)-(x), paras 5.8-5.73) outlining the policy position favouring the suitability of the site for housing. This is not in dispute; however – as the Council and OAG also make clear – the proposed development as it stands is not acceptable, for the reasons we outlined in our objection letters.
4. In our representation letter of October 2019 we also (prior to the publication of the recent evidence documents supporting the emerging Local Plan) speculated that the site would continue to be included as an allocated site unless it had acquired additional ecological value which could not be mitigated in development. Dr

Rivers' evidence shows that the biodiversity value of the site has grown substantially and that the current scheme, even with the mitigation proposed, would cause harm such that both local and national planning policies are not met. We agree with Dr Rivers and support her conclusions.

5. Our final points are in respect of density. At paragraph 8.25 in Mr Bolton's proof, he helpfully points to the potential tension between enhancing green infrastructure and increasing density. He goes on to state (para.8.36) the scheme's density is appropriate as it maintains the residential character of the area. In our earlier representation we made reference to NPPF para.123 where significant uplift in average density is sought in locations well served by public transport, unless there are strong reasons why this would be inappropriate. In our view, mimicking historically low density development, such as the adjacent Woodland Heights, is not a strong reason to accept low density now.
6. Mr Wood's 'Illustrative Design Exercise' shows in outline how densities of between 39-48 dpa could be achieved whilst providing suitable innovation in sustainability and green infrastructure, as envisaged in the Planning and Design Brief and Policies CS64 and CS65. We concur with OAG's evidence on density and support it.
7. Given the CPRE's long history of fighting to protect green belt, it is unsurprising that we concur with Mr Bolton's point at his paragraph 5.64 where he states: *"It is clear that if full use is not made of allocated sites such as the appeal site, the consequence is likely to be Green Belt release or many city centre flats which, as set out above, would be inconsistent with the housing needs"*. We could not agree more but are clear that this scheme does not make "full use" of the appeal site, fails the test of making efficient use of land and should therefore be refused, in line with the Council's conclusion in Mrs Hull's evidence (paragraph 6.50).

Dr Andy Tickle
12 January 2020