

## **ECCLESFIELD PARISH COUNCIL'S RESPONSE TO SHEFFIELD ADDITIONAL SITE ALLOCATIONS CONSULTATION**

I am writing to make you aware of the strong objections that Ecclesfield Parish Council and the wider community have regarding the unacceptable proposals contained in the above document.

In preparing this response we have consulted extensively with local parishioners and others.

As you will be aware, there is substantial opposition to the proposals in Ecclesfield Parish ('the Parish') and more widely. Not only from local residents but also many other bodies and individuals. We strongly support and endorse these objections.

Whilst the proposals are not without some benefits such as facilitating the provision of much needed general and affordable housing, these would not outweigh, by a wide margin, the harm it would cause. It proposes to remove over 104 hectares of land from the Green Belt in the Parish (51% of the total amount across the city – over half!). This is totally unacceptable especially as it is grossly disproportionate and out of scale with the local area and would overwhelm local services and infrastructure. It would also cause significant harm to the landscape, distinctiveness and well-being of the communities (and its wildlife) in the Parish. Nor does it constitute sustainable development. Further, there are serious shortcomings in the unsound plan preparation process.

To put this into perspective, based on the 2021 census the Parish had 31,135 residents, Sheffield as a whole had 556,221 residents, therefore, we have less than 6% of the total population. However, Sheffield City Council propose to allocate 51% of the development on the Green Belt in Ecclesfield Parish, which is completely unsustainable, unfair and grossly disproportionate,

There are fundamental and deep-seated issues with the proposals that cannot be addressed through tweaking and making amendments, it should be withdrawn and started afresh.

It should be noted that the Council has commissioned its own independent 'Review of the Highway Implications on Ecclesfield Parish'. This attached document forms an integral part of its submission and must be read in conjunction with it.

## **There has been insufficient regard to the National Planning Policy Framework (NPPF), especially with regard to the protection of the Green Belt**

The approach taken by Sheffield City Council is fundamentally flawed. In particular, it has insufficient regard to the requirements contained in the NPPF especially those contained in paragraphs:

- 142, which “*emphasises the great importance that the Government attaches to Green Bel*”.
- 145, that requires “*Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans*” and
- 147, which requires, “*Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development*”.

The proposals, both in respect of the Parish and more generally, fail, by a wide margin, to meet these and several other relevant national planning requirements, including those contained in the Green Belt Planning Practice Guidance.

In particular, we strongly contend that all other reasonable options for meeting the identified need for development in the city have not been fully examined as advocated in the NPPF and supporting national planning policies and statements.

Effectively only one ‘take it or leave it’ option is being put forward - involving the release of large areas of the Green Belt for housing, employment and other forms of development. The fundamental question being asked through the consultation is which sites should or should not be released from the Green Belt, not whether this is the best option. We strongly contend that there are other better options.

Considering first the option of maximising the use of suitable brownfield sites and underutilised land. An approach that is strongly supported by national planning policies, as illustrated by:

- Section (a) of paragraph 147 of the NPPF requires that before proposing changes to Green Belt boundaries the local authority (in this instance, Sheffield City Council) must be able to demonstrate that it makes “as much use as possible of suitable brownfield sites and underutilised land”
- Furthermore paragraph 124 of the NPPF, requires that “strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or ‘brownfield land”.

The approach taken in the consultation document is flawed for three main reasons.

Firstly, it does not make as much use as possible of brownfield sites and previously developed land to accommodate future development needs. Just to provide two good examples of a major suitable brownfield sites to illustrate this point; we consider that part of the route of the proposed and now shelved HS2 that cuts through the city has the potential to accommodate a significant amount of development. This site we consider to be a suitable and sustainable location for development, but it appears to have been overlooked. The same can be said about the Norton Aerodrome site. Can we stress that these are just two good examples. There are many other previously developed and brownfield sites we consider that have been overlooked.

This includes the availability of previously developed and grey belt sites in the Green Belt. This is a major concern especially as it is a planning requirement as paragraph 148 of the NPPF states “Where it is necessary to release Green Belt Land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations”.

Secondly, the focus of the approach is on the identification of a few relatively large-scale sites to meet development needs. This preference is flawed, especially as it overlooks, and generally has insufficient regard to, the identification of smaller sites, including in the built-up areas, which often could be developed more quickly and sustainably than larger ones.

Thirdly, nor have other reasonable options, such as building at a higher density, been fully explored as advocated by paragraph 147 (b) of the NPPF.

We strongly consider that much, if not all, of the additional housing and other development growth required can be accommodated: -

- (i) on brownfield sites and previously developed land in the city and outside of the Green Belt
- (ii) by greater optimisation of existing identified and “windfall sites”, including building at a higher density and to a much lesser extent previously developed and grey belt sites in the Green Belt.

This would, we consider, negate the need to develop on greenfield sites in the Green Belt. This includes the sites in the Parish proposed to be removed from the Green Belt.

### **The Overall Green Belt Site Parcel Selection Process is Flawed and Deficient**

We also consider that the overall process to identify the sites ‘the parcel selection’ process is inadequate and lacks transparency. As mentioned earlier, paragraph 145 of the NPPF, requires “Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans.” A requirement that the site selection process fails to meet both in the Parish and the city more widely.

Nor does the process support wider national and local planning Green Belt policy requirements e.g. in relation to protecting high performing Green Belt and promoting sustainable development. This includes the provisions contained in the Green Belt Planning Policy Guidance, one of which states “This guidance is relevant to those authorities performing a review of Green Belt boundaries to meet housing or other development needs (either prior to or as part of the plan making process)”.

We say this for four main reasons:

Firstly, there are fundamental flaws in the basic geographical building blocks used to undertake the assessment to select the sites. There are huge disparities in the sizes of assessed sites. In the Parish, for example, the largest assessed site (‘the Wheel’ Ref: S03051 and SO3034) at over 30 hectares is over five times bigger than the

smallest assessed site ('Middleton Lane' S03035). This is compounded by the decision to merge some of the sites (often with little supporting justification).

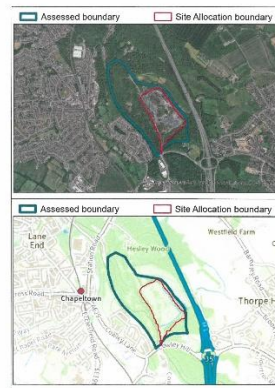
Secondly, many of the assessed sites are simply too large to enable their proper consideration. Something that the assessment process implicitly recognises when it divides individual sites into development and non-development areas. To provide one good example. Site S04639 Hesley Wood, north of Cowley Hill, covers a total area of 15.61 hectares, much of the site is an Ancient Woodland. We understand that the proposal is that the whole of the site should be released from the Green Belt, but the Ancient Woodland part of the site will be protected from inappropriate development. This is illogical. Surely, it would make more planning sense to retain that part of the site that is an Ancient Woodland in the Green Belt. We should add that we contend that the whole of the site, especially the Ancient Woodland, still fulfils an important Green Belt function.

The same can be said of site S04101, land off the M1, which covers 16.37 hectares, and includes Ancient Woodland as well as a Priority Habitat. Indeed, it includes Priority Habitat within the actual site allocation as well as the assessed boundary. Similar to the above, we strongly believe that had the site assessment been undertaken at a more appropriate level this would have resulted in (quite rightly) important environmental features and development constraints being excluded.

All of the areas of the Green Belt should be broken down into smaller more equally sized areas. Not least to make the process fairer, robust and transparent. In addition, to be "sufficiently granular to enable the assessment of their variable contribution to Green Belt purposes" as required by the national planning rules; something which it is not.

Thirdly, many of the resulting boundaries are not strong and defensible as advocated by the NPPF. A good example is site S04639 Hesley Wood, north of Cowley Hill, which not only provably "sticks out like a sore thumb" as an example of the proposed site to be removed from the Green Belt whose boundaries are inadequate, but it also looks like one (see below).

**Green Belt site allocation appraisal  
(Employment)**  
 Site Reference: S046390  
 Address: Hesley Wood, north of Cowley Hill, S35 2YH  
 Gross site area (Site Allocation): 15.61 Hectares  
 Net housing area: 0.00 Hectares  
 Estimated housing capacity: 0 homes  
 Net employment area: 13.35 Hectares  
 Ward: East Ecclesfield Ward  
 Housing Market Area: Chapeltown & Ecclesfield  
 Ownership: Private



Page 93 of 332

In part, this is due to a woefully inadequate regard having being given to the requirement in the NPPF that boundaries should be strong and defensible, but also there has been an inconsistent approach to the use of established manmade and nature features (as advocated by national planning policies) – some use major features such as roads and long established fields boundaries and other less robust minor features.

Fourthly, the evidence generally presented to justify the methodology used is woefully inadequate and lacks transparency. This includes the over reliance on often inadequate desk-top studies.

We stress that we consider that all the sites to be ‘high performing’ in Green Belt terms. They have and continue to perform an important Green Belt role, particularly in checking the unrestricted sprawl of built-up areas, safeguarding the countryside and focussing development on brownfield sites and concentrating development into urban areas. Indeed, it is considered that they continue to fulfil all five of the purposes for Green Belt as set out in the Local Plan and the NPPF.

Had a clearer and more robust process been undertaken, we are convinced that it would have concluded that none of the proposed Green Belt releases in the Parish could be justified. Especially having regard to national rules that require that Green Belt land is released only in very exceptional circumstances and those places that perform the weakest Green Belt function and in the most sustainable location.

## **Flawed and Inadequate Consultation Process**

There are serious shortcomings with the consultation process, which we do not consider was carried out properly and did not afford the public and other interested parties a meaningful opportunity to engage in the process.

This is especially important as the proposals contained in the consultation document are so important to the city (as reflected in the interest it has generated by the public and others), involve making difficult decisions and are so complicated.

The consultation period of 6 weeks was not long enough, especially having regard to the length and the complexity of the consultation document and supporting documents, which ran to over a thousand pages. This was further compounded by the fact that many of the documents were so technical to make them almost impossible for a reasonable person to read or understand. This is especially relevant to our Parish which contains 9 sites (a figure that increases to 11 sites within S35 postcodes if we look at other listed sites such as Oughtibridge and Wharncliffe Side). This is an unreasonable volume of documentation for residents to be able to digest within the consultation period.

There were also issues with the consultation maps, which were provided at such a low size and scale that it was difficult to see precisely the proposed sites (individually and collectively) and their impact. We understand there were also issues with accessing some of the documents, some of which were added after the consultation period began. There was also an over reliance on online and electronic approaches that is likely to exclude a very significant proportion of the population. Particularly older generations, (of which we have an above average percentage in the city), many of whom by their own omission cannot use the internet. This skews the outcomes of the consultation to groups and individuals that are more computer savvy.

More widely, we have been made aware of fundamental issues with the consultation undertaken with the site selection process. This includes landowners of sites being proposed for release from the Green Belt not being informed or being asked for their consent to do so. If true, this not only raises some serious questions about the consultation process, but also the availability of the sites. National planning rules require that, for a site for to be considered available for development, it must be available. This includes a clear signal from the landowner that they are willing, in

principle, for their site to go forward for development. We understand that some sites have gone forward without such assurances from the landowners; indeed we have been informed by some landowners in the Parish that they have categorically stated that their site is not available for development and, therefore, do not wish for it to go forward for release from the Green Belt stated, but it has still been included nonetheless.

## **Weak and Flawed Individual Site Selection Process**

The fundamental issues with the overall site selection process are compounded by the individual 'suitability assessment' site selection process, which is far too subjective and not supported by a clear process, justification or criteria. If its aim is to support and justify the selected sites, and the reasons why some sites have been selected over others, it fails to do so. There are many reasons why we state this, but to highlight several examples:

- There is inadequate detail on what the assessment involves and how it was used, including criteria and scoring (if any) to select the final proposed sites.
- As its relationship with the Green Belt Assessment. It is unclear how each have informed each other.
- Despite the process showing that all or most of a site is unsuitable for development because of insurmountable physical or policy constraints such as flood risk, air quality issues, presence of priority habitats and Ancient Woodlands, they are still considered suitable for development. Such sites should be removed.
- The list of constraints is incomplete. These include impacts on biodiversity especially priority species such as badgers, bats and lapwings, for example. all of which are present in the Parish.
- In terms of non-natural assets, it focuses on the quantity of provision not its quality. That a site is in close proximity to a school has little relevance if that facility is full, such as a school or doctor's surgery, especially where there is no capacity to expand it as is the case in some locations in the Parish.



- We would question the relevance of some of the criteria such as ‘Potential to provide development that would be beneficial to disadvantaged communities.’ What does this mean in practice especially when considered to a housing site?
- Some of the terminology used is ambiguous and potentially misleading. One of the criteria looks at impact on Local Green Spaces. The phrase Local Green Space had a statutory definition as set out paragraphs 106 and 107 in the NPPF. Is this the same definition as the NPPF or a different more imprecise one, we suspect the latter.
- There are errors, sites NES36, CH04 & CH05 are assessed as being near to local GP’s when in fact this is an NHS referral site treating patients with cataract surgery! Likewise with site CH03 land bordered by M1, Thorncliffe road, Warren Lane & White Lane, the community buildings taken into consideration are a burnt down derelict computer college and Hilltop Nursing Home.
- Over reliance on desk top studies, for example, in relation to archaeology, wildlife and landscape rather the required detailed assessments.
- It has insufficient regard to the principles of sustainable development (which the NPPF states should be at the heart of planning decision making) both here and more widely including the sustainability appraisal. We expand on this later. We strongly believe that the assessment should explicitly look at the individual site’s contribution to sustainable development and be clear on how this informed the overall contribution consideration of a site’s suitability.

Special mention should be made here of how it overlooks the cumulative impact of the selected sites - sites score green because they are close to social and physical infrastructure, but other sites also score green because they are close to the same facility. Effectively they are double counting the same often already inadequate infrastructure.

For example, sites SO3028, S02100, S03034, S03035 and S03051 all note that they are within 800m / 10 minute walk to a convenience shop. The closest shop is a little corner shop – which all these sites would share and is over 800m away on Cowper Avenue, Foxhill – S6 postcode. Yet again demonstrating that these sites have not been looked at collectively.

Similarly, traffic movements and impact on air quality. Sites score well on assessment because it is considered that their individual impact (sometimes incorrectly) will be limited but had their impact been considered cumulatively, taking into consideration of other proposed nearby sites (and as advocated by the NPPF) their rating would have been very different.

As this clearly demonstrates, these are serious short comings in the process. The suitability assessment is fundamentally flawed. In particular as it results in sites being put forward for development in the Parish and more widely across the City, when there are other more suitable and sustainable sites that are being disregarded.

Turning in a bit more detail why we consider the individual sites in the Parish face serious site non-highway (which are dealt with in the accompanying document) constraints that make them especially unsuitable for development, we would highlight:

#### **CHAPELTOWN:**

##### **S03038 – Land to the east of Chapelton Road, S35 9ZX**

- Flood zone identified bordering site
- High noise pollution
- Identified area for protected species, including lapwing

##### **S04639 – Hesley Wood, north of Cowley Hill, S35 2YH**

- Ancient woodland identified within site
- Priority habitat identified within site
- Flood zone identified
- High noise pollution
- Identified area for protected species, including badgers and lapwing

##### **S03112 – Land bordered by M1, Thorncliffe Road, Warren Lane & White Lane, S35 2YA**

- Ancient woodland identified within close proximity of site
- Historic landfill identified
- Priority habitat identified within close proximity of site

- Flood zone identified
- High noise pollution
- Identified area for protected species, including badgers and lapwing

#### **ECCLESFIELD:**

##### **S04101 – Land to the south of the M1 motorway junction 35, S35 1QP**

- Ancient woodland identified within site
- Priority habitat identified within site
- Flood zone identified
- High noise pollution
- Identified area for protected species, including lapwing

#### **GRENOSIDE:**

##### **S03028 – Land to the west of Grenoside Grange, Fox Hill Road, S35 8QS**

- High noise pollution
- Identified area for protected species, including lapwing

##### **S03100 – Holme Lane Farm, Halifax Road, S35 8PB**

- High noise pollution
- Identified area for protected species, including lapwing

##### **S03034 - Land between Creswick Avenue & Yew Lane, S35 8QN & S03035 – Land at Wheel Lane & Middleton Lane, S35 8PU & S03051 – Land to the south of Wheel Lane, S35 8RY**

- Ancient woodland within close proximity to all 3 sites
- Priority habitat identified on all 3 sites
- 1 listed building identified within close proximity to all sites
- Flood zones identified on all 3 sites
- Medium noise pollution
- Identified area for protected species, including lapwing

## **Adverse impact on already stretched facilities and infrastructure**

There is already a serious issue with infrastructure and service provision in the Parish and the proposals will only make this already unacceptable situation much worse.

Ecclesfield Parish already has limited services and infrastructure many of which are already struggling to cope with demand, such as local medical practices and schools. In addition, there are already well documented issues with flooding as well as air quality and noise pollution especially along the motorway corridor.

While the proposals include the provision of some improvement to local services, these are sketchy and grossly inadequate to meet the anticipated local demand of the development.

Primary and secondary schools within the Parish are already oversubscribed, as are GP surgeries. The suggested sites are also on poor bus routes and have insufficient retail and other facilities close by, for example.

## **It Does Not Represent Sustainable Development**

National planning rules are clear that this should be at the heart of planning decision making. As paragraph 1 of the NPPF states: “The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development and supporting infrastructure in a sustainable manner”.

We strongly contend that the proposals in the Parish (individually and collectively) do not represent sustainable development.

This is for a variety of compelling reasons, many of which we have detailed earlier. These include that the proposals are disproportionate and grossly out of scale for the Parish as well as the serious lack of social and physical infrastructure even after taking into account the inadequate and sketchy mitigation measures contained in the document.

We would like to make special mention that they would promote unsustainable forms of transport movement especially by car.

National planning rules are clear that “Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes” (NPPF, paragraph 110).

Also, of special relevance here is paragraph 155 of the NPPF, with its emphasis on “The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where” ....”The development would be in a sustainable location”.

A requirement the proposal fails to meet and by a wide margin. Especially as they do not offer a genuine choice of travel modes nor encourage the use of sustainable modes of travel as required by national and local planning policies. Access to them will be overwhelmingly reliant on the car and other motor vehicles. This is not sustainable development.

The evidence for this is strong, just to give two examples:

- The sites are poorly served by public transport and other sustainable transport options such as by foot or bicycle. Bus services to the sites are at best poor and for many practically non-existent. Many of the sites are more than 400 metres away from the closest bus stop and some such as (S04101 - Loicher Lane) closer to a kilometre. The majority are not served by a Sunday bus service whatsoever. This includes employment sites, for example, S04639 Hesley Wood.
- Some of the sites are being actively marketed on the basis of their proximity and easy access to the motorway network. Site for example S04639 Hesley Wood, North of Cowley Hill is described by its promoter as “Prominently located at Junction 35 of the M1 Motorway” (see [Elevate, Sheffield, J35, M1 - Rula Developments](#)).

Furthermore and specifically, sites S03038, S03112 & S04101 are within close proximity to the M1 junction and are a good example of this. Two of these sites are for employment, the other proposes 600 houses. Current traffic levels for commuting, (as well as throughout the day) are terrible. To increase this further would be completely unsustainable for the area.

Can we stress these are just a few good examples of how the proposals do not constitute sustainable development.

The Parish Council has commissioned its own independent 'Review of the Highway Implications on Ecclesfield Parish' by respected highway consultants HD Consulting. This report, which forms an integral part and must be read as part of the Council's submission, provides comprehensive advice that the proposals promote unacceptable and unsustainable forms of transport movements in the Parish especially by car. It also shows that the transport related evidence provided by Sheffield City Council in support of the proposal is deficient and lacking in several key respects. As it states in its conclusions:

"The proposed Green Belt sites seem to be particularly well-located for access to the strategic road network (M1 in this case) and the M1/A616/A6135 seem to be a priority whilst the local network has been largely overlooked. Whilst it is acknowledged that housing and employment sites bring benefits such as availability of homes, jobs and other local benefits, the consultation documents provide very limited assessment, and therefore do not offer any confidence, that the local highway network, particularly, could cater for such an increase in demand or that local and national policy objectives, especially on active and sustainable travel, could be achieved. The case for 'sustainability' is particularly weak.

Whilst it is acknowledged that these documents are very much strategic at this stage, there is no reference, in the documents relating to highway assessment, about the number of houses, number of people employed, likely trip data, highway access etc., making it difficult to refer to in this report. Neither is there mention of the effect of ongoing developments outside Ecclesfield Parish (for example in Oughtibridge and Deepcar), or those already in construction in Ecclesfield Parish itself. Much of the detail to address likely highway impacts appears not to have been sufficiently investigated. Where assessment has been carried out, results (such as the RAG ratings in the individual site assessments) seem to be biased in favour of site suitability.

It could be argued that these proposals have been put together hurriedly to identify sites to meet the required allocations so that the Sheffield Plan has less chance of being rejected. It seems a shame to propose Green Field land, which is always contentious, when in Sheffield, particularly, there seems to be more than enough land

in the more urban areas, closer to the City Centre, where regeneration would be welcomed and where sustainable travel could be far more easily achieved with practical walking, cycling and bus & tram travel. Again, and as mentioned in the previous paragraph it could be why arguably this proposal for Green Field sites is being pursued with what could be perceived as an unsympathetic and distorted approach”.

For these are and other compelling reasons, at the very least the proposed Green Belt releases in Ecclesfield Parish should be removed.