From: Andy Tickle

To: Baxter Howard; planningapps@sheffield.gov.uk

Subject: CPRE SY supplementary comments 19/03143/FUL

**Date:** 13 February 2020 15:05:28

Attachments: CPRE SY supplementary comments 19 03143FUL Feb20.pdf

#### Dear Howard,

I am pleased to attach a PDF copy of our comments in respect of your re-consultation on application ref 19/03143/FUL. A hard copy will go in the post today.

Please note that on the SCC planning portal, our previous representation is titled as from Friends of the Peak District. This is clearly incorrect although we share a logo on our letterhead. Can I ask you or colleagues to please correct the entry on the document list? With thanks,

Andy

### **Andy Tickle**

# **Head of Campaigns**



Friends of the Peak District/CPRE South Yorkshire

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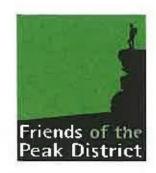
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### BY POST AND EMAIL

Planning reference: 19/03143/FUL

13 February 2020

Howard Baxter
Planning Officer, SCC
Howden House
Union St
Sheffield S1 2SH

19/03143/FUL: Land off Moorthorpe Way, Sheffield S20 6PD

We refer you to our previous submission (objection) of 9 October 2019. Our original objection stands and the comments below represent our supplementary comments on the additional planning documentation you are consulting on (uploaded to the SCC planning portal in January).

In summary we still object on the ground of failing to make efficient use of land (contrary to NPPF para.123), not contributing sufficiently to the need for low carbon development and place-making, and prematurity in relation to the emerging draft Local Plan (contrary to Council motion passed on 12 June 2019, see especially paras (f) and (g) referencing sustainable use of land and the climate emergency, respectively).

We also concur with the Sheffield and Rotherham Wildlife Trust's comment, which we support in full, that there are important gaps in data (especially ecological) that need to be addressed before the application can be lawfully determined. We also support their view that the displacement of parts of the development (e.g. LEAP and attenuation pond) to adjacent areas of the wider site (i.e. beyond the boundaries of site E) adds weight to arguments that more comprehensive surveys are required (i.e. across sites C and D), to inform determination of this application.

We also note the apparent absence of a Coal Ming Risk Assessment which was specified as a requirement in the Planning and Design Brief (see para.5.6.7). In the absence of comments from The Coal Authority, the issues of site stability (in relation to historic workings) and sterilisation of reserves by non-mineral development are still in need of resolution. The Geo-environmental Appraisal (Lithos Consulting, 2014) is not sufficiently detailed to rely upon.

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

We have already urged a more holistic approach be taken to the total site area (C, D & E), as pre-figured in the now dated Planning and Design Brief (SCC Planning Service, July 2014). Since the submission of the amended/further reports by Avant, it is now clearer that for many aspects of developing site E (the current proposal), wider information is required to make an informed judgment of overall impacts across the entire site allocation.

As stated previously, we believe the design, density and sustainability elements of the proposed development are unacceptable. A recent independent research report, commissioned by CPRE nationally, found that the majority of current housing development is 'mediocre' or 'poor' and much could and should have been refused by local planning authorities, following their own policies.¹ In relation to both the original Planning and Design Brief and the recognition of the need to respond urgently to the climate emergency, the energy/carbon measures suggested by Avant (or their consultants, see for example the amended energy report) are insufficient. The Planning and Design brief also covers sustainability, including the need for an 'innovative approach' beyond the basic requirement for Code for Sustainable Homes Level 3 and a further requirement for green roofs.

We trust these comments are of use. Please do not hesitate to contact us if you require any further information or clarification. Please notify us of your decision in due course.

Yours sincerely,

Andy Tickle
Head of Campaigns
CPRE South Yorkshire

Cc: Dr Nicky Rivers, SRWT Ms Claire Baker, OAG

Clive Betts, MP

<sup>&</sup>lt;sup>1</sup> See <a href="https://www.cpre.org.uk/news/housing-design-2020/">https://www.cpre.org.uk/news/housing-design-2020/</a>