
Case Number	18/04034/OUT (Formerly PP-07353753)
Application Type	Outline Planning Application
Proposal	Outline application (all matters reserved) for the erection of 22 dwellings (Additional/amended supporting statements) (Amended Description)
Location	Land adjacent 127 - 139 Long Line Sheffield S11 7TX
Date Received	25/10/2018
Team	South
Applicant/Agent	ADAS
Recommendation	Refuse

Refuse for the following reason(s):

- 1 The site is located within land designated as Green Belt where there is presumption against inappropriate development. The proposal constitutes inappropriate development, which would result in significant impact on openness and harm to the character and appearance of the Green Belt. The other considerations that have been put forward by the applicant, individually or cumulatively do not outweigh the harm to the Green Belt, therefore the very special circumstances that are necessary to justify this inappropriate development in the Green Belt do not exist. The development would therefore conflict with Chapter 13 of the National Planning Policy Framework and Policies GE1, GE2, GE3, GE4, GE5, GE8 of the Unitary Development Plan, Core Strategy Policy CS71.
- 2 Insufficient information has been submitted to enable a full and detailed assessment of the impact of the development on the natural environment (The Peak District Moors Special Protection Area and the South Pennine Moors Special Area of Conservation) in respect of a Habitats Regulation Assessment (HRA). The Local Planning Authority must therefore conclude that the proposed development is contrary to Policy GE11 of the Unitary Development Plan, and paragraphs 170 and 175 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:

Site Location Plan Scan Date 25 Oct 2018

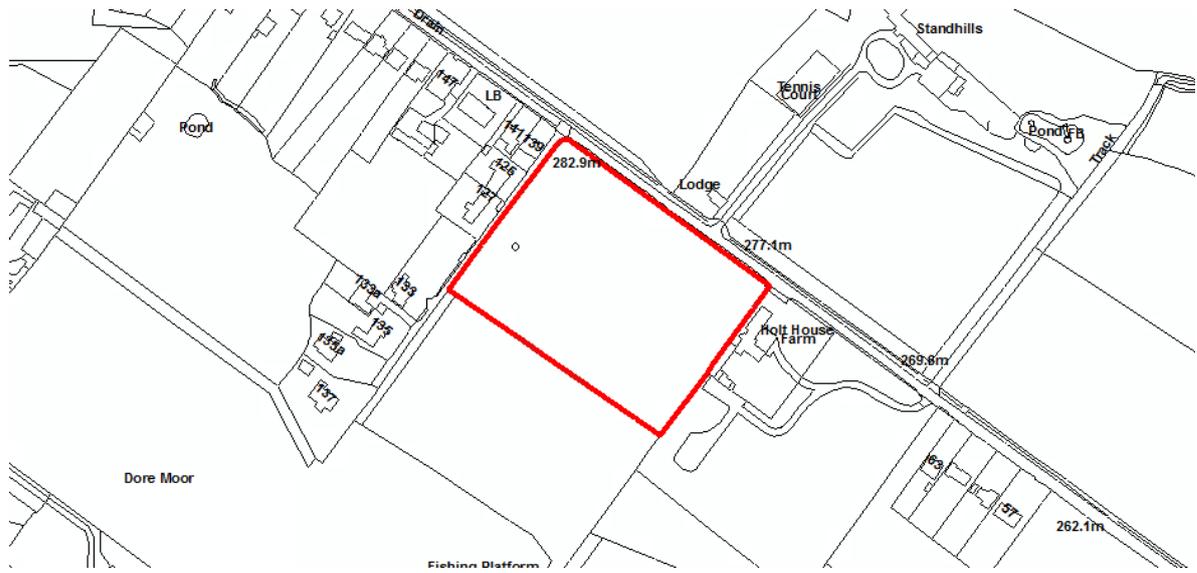
Site Plan with Ground Floor Layout 017028-AAD-00-GF-DR-A-0001-P04

Scan Date 15 Sep 2020

Site Plan with bio-diversity 017028-AAD-00-02-DR-A-0003-P04 Scan Date
15 Sep 2020

2. Despite the Local Planning Authority wishing to work with the applicant in a positive and proactive manner, the application is considered contrary to policy requirement(s), and, there being no perceived amendment(s) that would address these shortcomings without compromising the fundamental intention of the scheme the Local Planning Authority had no alternative but to refuse consent.
3. The screening for the Habitat Regulation Assessment (HRA) document submitted by the applicant does not go into enough detail about the existing habitats, impact pathways, construction disturbance etc, and is based on reports which contain insufficient information.

Site Location



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INTRODUCTION

This application was deferred from consideration before the previous Committee meeting to allow time to consider additional information submitted by the applicant immediately prior to the meeting. This was in the form of an Addendum to the shadow Habitats Regulations Assessment (HRA). This document has now been reviewed by the Council's Ecologists and Natural England. The report below has been updated to reflect this.

LOCATION AND PROPOSAL

The application relates to a site on the south west side of Long Line between Holt House Farm which is to the south east of the site, and the access track running perpendicular to Long Line which serves 125-137 Long Line. The site comprises of an open field containing no visible structures measuring approximately 1.6 hectares in area. The land slopes slightly from north down to the south by approximately 10 metres over the length of the site fronting Long Line which is approximately 150 metres long and 100 metres deep.

The site is bound by dry stone walls along three sides, with a post and wire fence along the south west boundary and is within Sheffield's Green Belt.

Outline planning permission is sought for the erection of 22 dwellings with details of access included for approval at this outline stage. All other matters, of layout, scale, appearance and landscaping are reserved for subsequent approval.

An indicative layout accompanying the application shows 22 dwelling, consisting of a mixture of two, three and four bedroom properties with a landscape buffer, and access to be taken from Long Line. The applicant has submitted further details which identifies that 13 of the units will be affordable units, (4 older person units, 4 two bedroom units and 5 three bedroom units) with the remainder consisting of 4 market older person units for the market and 5 four bedroom units for the market.

PLANNING HISTORY

A pre-application enquiry was submitted in 2017 for the erection of 3 dwellings. The advice given was that any proposal for housing on the site would unlikely be considered favourably by the Authority owing to a conflict with Green Belt Policy.

SUMMARY OF REPRESENTATIONS

Olivia Blake MP for Hallam objects on the following ground:

- The site is part of the Green Belt, and the Dore Moor Local Wildlife Site. This alone should make for inappropriate development. It does not meet National Green Belt Policy, NPPF para 143,144, 145 or 175(a) nor local policy.
- The site is viewable from the Peak District National Park and the scale of this proposal would spoil the character.

- The site has historical importance as one of the first Green Belts outside of London.
- Drainage and water run-off is already a problem along Long Line and this proposal would further exacerbate this.
- The proposal would heavily over-develop the site, it would be out of character and out of scale.
- Bus services are in-frequent, and households would likely require private transport, this would greatly add to congestion in the area, making walking along Long Line even less safe for pedestrians.
- Proposing a commuter community that would be dependent on travelling to work or to the shops fails to be sustainable.
- There is strength and depth of community feelings against this proposal with the large number of objections. There has not been enough community engagement, and this lack of concern for those who already live on the site is reflected in the application.

Councillor Colin Ross strongly objects to the proposal. This is development in the Green Belt, and there are no grounds on which to justify this major development and breach of the Green Belt.

Councillor Martin Smith and Councillor Joe Otten have objected to the proposal as the site is in the Green Belt, and the development would be totally out of keeping with the local environment.

Campaign to Protect Rural England (CPRE)

- The site is located within the Green Belt and an Ecological Local Natural Site (part of Dore Moor Local Wildlife Sites).
- Sheffield's lack of a five-year housing land supply means that relevant development plan policies are deemed out of date. As a result, there is no justification for approving the application purely in relation to meeting housing need. Consequently the application must show very special circumstances needed to approve development in the Green Belt.
- This 1.6 hectare site which is all in the Green Belt will inevitably harm the Green Belt. NPPF paragraph 143 states by definition; that inappropriate development is harmful to the Green Belt. The only relevant exception would be that the application displays very special circumstances, and this application does not.
- There is some support for the proposals from people living in the wider area, and these reflect the support for more affordable homes generally, which we do too. But there is adequate housing land available that is not in the Green Belt.
- We share the applicant's assessment that there is a need for elder persons housing, but this site is not well enough connected, is not in a sustainable location and there is enough urban housing land.
- It is hard to see how a standard foot way would be created, and it would not run along the whole of Long Line or make the crossing over Hathersage Road any safer. It would also damage the rural nature of this location through further urbanisation.

Peak District National Park

- The landscape assessment needs to assess the impact in the context of the statutory National Park.
- The fringe landscape of the National Park plays a really important role of protecting the wilder experience.
- The dense, compact and urban form of the proposed development only serves to consolidate urban qualities in what is a more rural character at this point. Long Line is largely single depth in terms of its layout, interspersed with historic farmsteads and spaces of rural character.
- It is the wrong location for a development of this size, number and layout. It is therefore inappropriate in this location, which forms a valued setting to the Peak District National Park.

Sheffield Wildlife Trust

- The site is designated as a Local Wildlife Site in the Greenbelt and is not designated for development. The application should therefore be refused as it is not in line with Sheffield Council's own strategic land allocation and associated policies.
- The ecological assessments are inadequate, including the fact that the field was mown just prior to the botanical survey, and the updated survey took place in December. No impact assessment has been carried out and a Habitat Regulation Assessment required under the Habitats Directive has not been carried out.
- Loss of species-rich grasslands and heathlands to be replaced by trees in 'biodiversity enhancement zone', this is not appropriate for this Local Wildlife Site.
- The biodiversity enhancement zone is now better thought out, but the amount of mitigation/compensation is still inadequate by a local of Biodiversity Net Gain.

Dore Village Society

- The proposal does not achieve sustainable development. The site is outside the urban area of Sheffield on Green Belt and is remote.
- The proposal would not support the current development along Long Line.
- The proposal would not contribute to protecting and enhancing our natural built and historic environment, sites of biodiversity, or the Peak District National Park.
- The development would contravene the purpose of Sheffield's Green Belt
- The proposal cannot be justified by Very Special Circumstances and does not meet any of the exceptions listed in para 145.
- The proposal does not accord with CS26 (Density) CS74 (Design Principles), CS73, GE1, GE2, GE5, GE8, GE10 (Green Belt), H14 (Highways).
- Also, the proposal does not comply with the Dore Neighbourhood Plan DN2 (Landscape Sensitivity of the Setting of the Peak District National Park),

DN3 (Green Infrastructure), or DN4 (Long Line Substantially Developed Road Frontage).

- The developer's statement does not reflect the general opposition expressed by the local community, with Dore Village Society comprising over 1000 members, and on whose behalf these objections are made.

Dore Neighbourhood Forum

- The site falls within the Green Belt, and there is no possibility of this site being released from the Green Belt.
- The proposal is not 'limited infilling in villages' nor 'limited affordable housing for the local community needs' contrary to NPPF paragraph 145. Long Line is not a village, and it is not close enough to Dore Village to be considered potential infilling.
- Affordable Housing should not be in a location that is isolated not only from the City, but also Dore.
- The proposal does not comply with DN2 of the neighbourhood plan, this substantial housing development makes no attempt to conserve or enhance the landscape character of the Green Belt and Local Wildlife Site.
- The application would conflict with DN3, in that it does not restore or enhance connectivity for nature and people through linking sites.
- The proposal is contrary to DN4, which limits development along Long line to the existing groups of dwellings, and this proposal does not sit in one of these locations.
- The site is well within the landscape setting of the National Park, and close to the Parks Natural Zones. Building a 22 house estate of houses on a Local Wildlife Site and on an otherwise linear development within existing green gaps is unacceptable, and cannot be solved by any screening (i.e any woodland).

Long Line Residents Association (LLRA) have submitted comments which are summarised below:

- The proposed development is within an Area of High Landscape Value, close to the boundary of the Peak District National Park, this suburban style housing is out of character with the rural nature of Long Line
- The proposal is within the Green Belt and does not meet the exceptions tests in para 145 of the NPPF,
- The Very Special Circumstances submitted do not outweigh the harm to the Green Belt.
- The infrastructure along Long Line is not adequate for affordable housing or elderly person units.
- The proposal would increase the potential for localised flooding.

In addition to this, the LLRA have submitted 9 Appendices which contain 49 pages of documents. These are of an assessment/critique of the reports submitted by the applicant. It is not possible to summarise the points raised, however the general theme is that the reports have not been carried out by an independent group, they are objectively and factual inaccurate, are not based on accurate or current

information and assessments. The reports have been undertaken without any consultation with residents of Long Line, the community users, local agencies, Local Councillors or the MP, and there are no grounds for Very Special Circumstances, with this plot of land within the Green Belt ,which should not be realised for use for this proposed development.

Individual Representations:

Objections

89 Objections have been received. Some of these representations have commented more than once, and this number reflects each individual representation and therefore there may be more than 1 per household. A handful of these objections are from outside of the City.

Green Belt

- The site is not allocated as a Housing Area, but is an important and invaluable Green Belt area that stretches into the Peak District National Park
- The site has historical connections defining Green Belts in the UK through Ethel Haythornthwaite's work.
- This sensitive environment must be protected, and proposed buildings are inappropriate,
- It is an inappropriate location within the setting and view from the National Park
- The negative impact in this already fragile area would be a disaster.
- The site is within an area of high landscape value and should remain as such.
- Other houses along Long Line have had planning restrictions on their properties being in the Green Belt.
- There are plenty of brown field sites available in Sheffield, without building on the Green Belt.
- The area has very limited infrastructure that would not be suitable for such a large development.
- New development would change the character of this countryside location
- The proposal is contrary to Council's adopted local plan, and does not meet any of the exceptions rules in the NPPF for developing in Green Belt.
- The proposal is contrary to NPPF paragraphs 143, 144 and 145, and Core Strategy Policy CS71.
- The proposal would be further development on land of high landscape value between the National Park and existing suburban settlements
- The proposal will set a precedent for neighbouring Green Belt sites.
- The open space between the current three groups of properties should be maintained, not only as a crucial part of the green belt but also as a vital corridor for wildlife, and for continued uninterrupted views both to and from the Peak District.

Affordable

- There is doubt that the houses will be affordable, an average small house along Long Line goes for £500k.
- The type and values of the properties on Long Line would in no way be in keeping with the type of affordable properties required over the coming years
- The affordable units will be aimed at young families, yet the schools in Dore are oversubscribed and the road is too dangerous for children to walk down.

Traffic/highways

- It would be detrimental in terms of noise and excessive traffic
- There is no footpath along Long Line, and an additional 22 properties would add to congestion and to the safety of pedestrians, and inadequate lighting.
- It is a long way to walk to Dore Centre and then walk back up hill with shopping bags with no footpath and crossing Hathersage Road.
- The traffic at the moment does not adhere to the 30mph limit and it is a very dangerous road.
- Whilst there are several bus stops along Long Line, there is an infrequent bus service (2 a day) and not at the weekend, and not suitable for commuters, so the development will be heavily car dependant.
- The distance to local services would mean older people or families with young children could only reach them by car.
- The Transport Statement refers to a direct link to the railway station, yet as residents for over 35 years, we know of no such link. (The information submitted is incorrect). There have also been several serious accidents along this stretch of road in recent years.
- The bus links along Hathersage Road are not suitable for people with mobility problems or young families as you have to walk along Long Line which is a narrow road/track and is some places only single file especially without a footpath.
- It will increase traffic using the dangerous road junction of Long Line/ Hathersage Road/ Cross Lane
- There would be major congestion during construction.
- The increase in traffic generated would alter the dynamics of the site.

Design/Density

- 22 homes on the site would be an unacceptably high density of buildings for this area.
- A suburban type estate of 22 houses is totally out of character with the rural nature along Long Line which consists of farm buildings, and elderly bungalows of individual design
- The overdevelopment of the area would ruin the views and surrounding houses and destroy the neighbourhood

Local Services

- There are already pressures on the village amenities and parking.

- There is an oversubscription on school places in Dore
- The proposal would lead to increase demand on dentists and healthcare.

Sustainability

- The proposal is too far away from the centre of Dore to support village centre sustainability.
- There are ample sites all over Sheffield with better access to the city centre and public transport than this site.
- The energy report is a theoretical report with no concrete basis

Drainage

- The drains already flood during periods of high rainfall, resulting in high volumes of water running down the road. Additional hardstanding will increase run off and cause more drainage problems.
- There is a culvert running under Holt House Farm and an underground spring emerges in the proposed development site.
- The existing culvert may not have the capacity to cope with the SUD's drainage from 22 new homes
- The biodiversity area is in a much better location now and is shown as containing two-surface-water reservoirs/ponds and this is viewed favourably, whereby excessive surface water will accumulate followed by the slow release. This should be implemented irrespective of any planning permission.
- There have been several instances of flooding in this position in recent years, including flood levels of more than 150mm.
- The existing culvert cannot be expected to handle any excess of surface water run-off from the application field.
- The site adjacent contains high clay content, and this may impact on this sites permeability.
- There are flooding issues due to excessive water run-off from the land above
- The proposal contravenes the NPPF and Policy CS63 and CS67.

Amenity

- Increased stress levels of local residents through increase in noise and disturbance.
- The proposed development runs adjacent to a lane serving a number of properties and will encroach on privacy, and restrict views of the surrounding countryside.
- House Plot 1 lies within 10 metres of the boundary wall of an existing neighbouring property.
- The proposals would overlook the existing adjacent properties and create of a loss of light to these windows.
- The proposal would impact on air quality.

Ecology

- The proposal will disturb the habitat of the wide range of wildlife that exists in the area.
- The proposal will be contrary to paragraph 175a of the NPPF, and Policy G1 of the of the emerging Policies and Sites document.
- The ecology appraisal is not accurate and the field survey was taken when the field has recently been cut.
- The report claims an enhancement of bio-diversity net gain due to tree plantation and two ponds on a narrow strip of the site. However there will be a loss of a meadow which is frequented by wildlife.

Sheffield Development Plan

- The next stage of the Sheffield Development Plan will be published within the next few months, no permissions should be given for developments of this size on an ad hoc basis whilst the future housing plan for Sheffield is in flux.
- The site has not been identified in the Green Belt review as being suitable for housing.

Dore Neighbourhood Plan

- The development would be contrary to the Long Line Policy in the Dore Neighbourhood Plan.

Others

- There is a flurry of activity supporting this development recently, the vast majority of these comments supporting the scheme live nowhere near the site. They are listed as neighbours but aren't.
- The level of publicity for the application is too narrow, and does not include anyone who cycles, runners, horse rides etc. in the area.
- The proposal is supported by a number of technical reports which have been engaged to support the application. The independence and reliability seems questionable.
- Open green areas improve the mental health of a community.

Support

19 Representations have been received in support of the application. These have generally come from people who are not immediate neighbours and some on which do not live in Sheffield. The representations vary in length from a single word of 'Support' to a couple of sentences. The main comments raised include:

- More new bungalows are need in this area
- Sustainable, energy efficient housing project.
- Great asset to Sheffield and the Peak District if the homes are truly affordable, especially to young families and older people.

- High demand for affordable housing on this side of Sheffield.
- The road is easily accessible and would be able to support the additional volume of cars the development would attract
- This a great incentive for first time buyers and families

PLANNING ASSESSMENT

National Planning Policy Framework

The National Planning Policy Framework (NPPF) set's out the Government's planning priorities for England and how these are expected to be applied. The key principle of the NPPF is the pursuit of sustainable development, which involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life. The following assessment will have due regard to these overarching principles.

Policy Context

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

The Sheffield Plan – 'Issues and Options' consultation is only 'emerging' and not at draft stage. Any potential future spatial strategies proposed do not therefore have any weight yet.

The key principle of the NPPF is the pursuit of sustainable development, which involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life.

Paragraph 12 of the NPPF makes it clear that a presumption in favour of sustainable development does not change the status of the development plan as the starting point for decision making. Paragraph 12 continues that where a planning application conflicts with an up-to-date development plan permission should not usually be granted.

Paragraph 213 of the NPPF confirms that policies should not be considered as out-of-date simply because they were adopted or made prior to the publication of the Framework. Due weight should be given to them, according to their degree of consistency with the Framework. Therefore the closer a policy in the development plan is to the policies in the Framework, the greater the weight that may be given.

The relevant policies of the statutory Development Plan are set out below under each sub-heading, along with an assessment of their degree of consistency with the policies in the NPPF. Conclusions are then drawn as to how much weight can be given to each policy in the decision-making process in line with the requirements of NPPF paragraph 213.

The assessment of this development proposal also needs to be considered in light of paragraph 11 of the NPPF, which states that for the purposes of decision making, (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, planning permission should be granted unless:

- (i) The application of policies in the NPPF which relate to protection of certain areas or assets of particular importance provides a clear reason for refusing the development proposed⁶, or
- (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.

This is referred to as the 'tilted balance'.

Footnote⁶ sets out a list of areas/assets of importance to which paragraph 11 d) i) applies, and this includes the Greenbelt in this instance.

Paragraph 11 of the NPPF also 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, the policies which are most important for determining the application will automatically be considered to be out of date.

Dore Neighbourhood Plan

The Dore Neighbourhood Plan has reached the Publication Consultation (Reg 16) stage with the consultation period finishing on the 26th October 2020.

Para 48 of the NPPF states: 'Local planning authorities may give weight to relevant policies in emerging plans according to: a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given); b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)'

The appointment of an examiner is now being progressed. The policy weight will only change once the examiner's report has been issued. Policies are considered to have limited weight if there is no inconsistency with the NPPF, and no unresolved significant objections. These policies would then need to be considered alongside all other development plan policies and material considerations.

Policy DN2 'The Landscape Sensitivity of the Setting of the Peak District National Park' applies to this development proposal. At present, this policy has limited weight as it is consistent with the NPPF. Other policies which are applicable are DN3 'Green Infrastructure Strategy', DN4 'Long Line Substantially Developed Road Frontage' and DN6 'The Provision of Smaller Homes.' These 3 policies at present are considered to have no weight due to inconsistency with NPPF paragraph 16(d).

Key Issues

The main issues to be considered fall under the following headings;

- Housing Land Supply,
- The acceptability of the development in land use policy terms and its impact on the Green Belt,
- The effect on future and existing occupiers living conditions,
- Whether suitable highways access and off-street parking is provided,
- The impact of the proposal upon the existing landscape of the site.

Housing Land Supply.

Policy CS22 'Scale of the Requirement for New Housing' of the Core Strategy 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.

This policy is only partly in conformity with the NPPF, as the Core Strategy is now more than 5 years old, the NPPF states that the housing requirement must be based on the local housing need figures using the Governments standard methodology.

Using this method, the housing requirement in April 2019 was 2,124 net additional homes per year for Sheffield (699 homes per year higher than the figure in Policy CS22. This translates to a requirement to provide 10,620 net additional homes over the 5-year period from 1 April 2019 to 31 March 2024 inclusive.

A 5% buffer is applied to this figure to ensure choice and competition in the market for land as required by NPPF paragraph 73. This produces a total net 5-year housing land requirement of 11,151 homes over the period 1 April 2019 to 31 March 2024 inclusive.

The majority of Policy CS22 therefore carries very limited weight. However, the policy states that a 5-year supply of deliverable sites will be maintained at all times, and the most recent published monitoring data (February 2020) concludes that there is 5.1 year supply. This part of the policy is in conformity with the NPPF.

- Five Year Housing Land Supply Position

The Five-Year Housing Land Supply Monitoring Report (published May 2020) sets out the housing land supply position for Sheffield as at 31 March 2019. The five-year period runs from 1 April 2019 to 31 March 2024 inclusive.

The report identifies a gross supply of 11,642 new homes over the 5-year period from sites with full or outline planning permission, development plan allocations, sites with permission in principle and sites identified on the brownfield register. Estimated losses of 250 are deducted from this figure producing a net supply of 11,392 additional homes over the 5-year period compared with a net requirement for 11,151 additional homes.

Sheffield can therefore demonstrate a 5.1-year housing land supply.

Paragraph 73 of the NPPF requires LPA's to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of 5 years worth of housing against their housing requirements.

Therefore, when considering housing land supply the presumption in favour of sustainable development as set out in paragraph 11 is not applied to the tilted balance in this case, with Sheffield demonstrating a deliverable 5- year land supply.

- Housing Delivery Position

The 2019 Housing Delivery Test confirms that 112% of Sheffield's housing requirement has been built over the last 3 years (also 112% in 2018). Therefore, there has not been significant under delivery within the District over this period in relation to the 45% threshold set out in the transitional arrangements detailed at NPPF paragraph 215.

This result also indicates that SCC's Development Plan policies will not be considered out of date solely on the basis of past delivery.

- Previously Developed Land

CS24 'Maximising the Use of Previously Developed Land for New Housing' is the most up to date policy for promoting the use of previously development land. This aligns with the paragraph 118 of the NPPF which gives 'substantial weight to the value of using suitable brownfield land within settlements for homes' and is reflected in the policy target of delivering no more than 12% of new homes on greenfield land.

However, the NPPF does not specifically advocate a brownfield first approach. CS24 does state that green field sites will be developed only whereby it is connected with housing renewal; in connection with identified sites and areas; small sites in urban areas and larger villages; in Owlthorpe Township, or sustainably located larger sites in a or adjoining urban areas or larger villages where there is less than a 5 year supply of deliverable sites.

This site is clearly a green field site and does not sit within the criteria set out by Policy CS24 as detailed above. Therefore, the application is contrary to Policy CS24. Paragraph 117 of the NPPF requires that decisions should promote the effective use of land in meeting the need for new homes, whilst safeguarding the environment, and this proposal would not achieve this.

- Efficient Use of Land

Policy CS26 ' Efficient Use of Housing Land and Accessibility' of the Core Strategy encourages making efficient use of land to deliver new homes at a density appropriate to location depending on relative accessibility. The density

requirements are a gradation flowing from highest density in the most accessible locations down to lower densities in suburban locations with less accessibility. This is reflected in para 123 of the NPPF and therefore Policy CS26 is considered to carry substantial weight in determination of this application.

Policy CS31 'Housing in the South West Area' of the Core Strategy limits housing development at appropriate densities to infill and windfall sites in the urban area and developments in highly accessible locations. This reflects the approach of the NPPF whereby substantial weight to the value of using suitable brownfield land within settlements for homes is applied, however, additional land may be needed to meet future housing needs, and therefore moderate weight should be applied in determination of the application.

For a site such as this, within which is within a rural area, CS26 part (e) is relevant and states that a range of 30-40 dwellings per hectares is appropriate. This part Long Line and the immediate surroundings is generally characterised by lower density development due to the presence of a high number of large dwellings which are set in substantial plots.

The application site is approximately 1.6 of a hectare, and the 22 proposed units would give a density of approximately 13 dwellings per hectare. This falls below the suggested range within the CS26 (e). Whilst the Council seeks to encourage efficient use of land, in this instance in this rural location within the Green Belt, a density to reflect the policy requirement would not reflect the prevailing density of the area.

This site is not an infill or windfall site, is not brownfield land, is not within the main urban area, and is not within a highly accessible location. Furthermore, the indicative plans show that to accommodate 22 dwellings into the site, these are likely to be 3 dwellings deep, and not just have a frontage onto Long Line. This is at odds with the characteristic of the area, and therefore the proposal does not accord with CS31 of the Core Strategy and paragraph 122 of the NPPF.

- Summary of Housing Need

The proposal is to develop a greenfield site, in a location which is not within or immediately adjacent to the main urban area and is not in a sustainable location.

Therefore on this basis, the proposal is inappropriate development within this isolated green belt location and where Sheffield can demonstrate a 5.1 year housing land supply to which considerable weight has been attached. This is contrary to Policies CS24 and CS31 of the Core Strategy and paragraphs 117 and 122 of the NPPF.

Green Belt

- Introduction

Chapter 13 'Protecting Green Belt Land' of the NPPF states that the Government attaches great importance to Green Belts, and the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open.

Policy CS71 of the Core Strategy is the most up to date local policy which seeks to safeguard the countryside by maintaining Green Belts. Development needs will be met through the re-use of land and buildings rather than expansion. The supporting text to Policy CS71 requires that the policy will be implemented through the development management process in accordance with national policy and therefore defers to NPPF paragraph 145.

Policies GE1, GE2, GE3, GE4, GE5 and GE8 are UDP policies relating to protection of the Green Belt. These are all assessed with relevant weight given to each in the sections below.

The following assessment is split into 5 main headings:

- (i) Whether or not the proposal is inappropriate development in the Green Belt.
- (ii) Whether there would be harm to the Green Belt
- (iii) Other considerations which weigh in favour of the development
- (iv) Whether very special circumstances exist.
- (v) Green Belt Balancing Exercise.

- Whether Inappropriate Development

Policy GE3 'New Building in the Green Belt' states that the construction of new buildings will not be permitted, except in very special circumstances, for purposes other than agriculture, forestry, essential facilities for outdoor sport and outdoor recreation and cemeteries, and other uses which would comply with Policy GE1.

Policy GE5 'Housing Development in the Green Belt' deals with the principle of new houses in the Green Belt. It details that other than those needed to support agricultural and other acceptable uses (as set out in Policy GE3 above), they will only be permitted where they would involve either; (a) infilling of a single plot within the confines of an existing village, group of buildings or substantially developed road frontage; or (b) replacement of an existing housing on the same site, providing that the new house is not significantly larger than the one it replaces.

All of the exceptions listed in Policy GE3, and GE5 where new buildings are allowed in the Green Belt, correspond with some of those listed in NPPF paragraph 145 and significant weight can be given to those parts of GE3 and GE5.

Paragraph 145 sets out that new buildings are regarded as inappropriate and lists 7 criteria (a-g) which are exceptions to this. These are:-

- a) buildings for agriculture and forestry;
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;

c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
e) limited infilling in villages;
f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:

- not have a greater impact on the openness of the Green Belt than the existing development; or
- 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.

The proposal for 22 houses is not considered to fall within any of the 7 exceptions, and as such is inappropriate development, by definition.

Policy GE5 of the UDP only allows for a single plot within the confines of an existing village, group of buildings or substantially developed road frontage, whereas part (e) refers to limited infilling in villages. The NPPF does not explain the term limited infilling for the purposes of a Green Belt assessment.

Long Line is characterised by small groups of houses at intervals along the southern side of Long Line, with only a few dwellings along the northern side. This existing development can be described as ribbon/strip development, and this site at present forms a significant and important gap between two groups of dwellings between Holt House Farm to the south east and No. 139 Long Line to the north west.

The proposed layout (although indicative) is suburban and does not reflect or reinforce the rural, and ribbon development character of the area. The scale of development swamps the entire plot with suburban style housing, and it is clear that 22 houses within a field which has a road frontage of 150 Metres, would not accord with the term limited infilling, whatever the layout.

A recent appeal, dismissed in 2017, at the site next door at Holt House Farm is a material consideration for this application. This related to a refused application for a single new dwelling, within a plot significantly smaller than this current application.

The Inspector in dismissing the argument put forward by the appellant that the site represented 'infilling' stated that there was an existing degree of separation and gap between the existing small group of houses, which resulted in the site not being considered to have a substantially developed frontage. This is the case with the current application site. Furthermore, the Inspector concluded that the development of a gap of the size proposed would not represent the infilling of a single plot or a limited infilling as required by policy.

Part (f) of para 145 refers to 'limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites). Firstly, it clearly states 'limited affordable housing for local community needs under policies set out in the development plan'. Sheffield's development plan consists of saved UDP policies and the Core Strategy, neither of which include such a policy and therefore this cannot be applied. Secondly, this clause is designed to deal with local community needs. Generally, this would mean needs that are specific to a Green Belt community (i.e. a specific village).

Sheffield's affordable housing need is calculated at a citywide level and disaggregated by housing market area (HMA). However, even that need which is identified at the housing market area level (i.e. South West HMA or Peak District HMA) is not locally specific to Long Line as a 'community', and therefore would not be sufficient to justify application of this clause in the NPPF.

In conclusion, the proposal fails to meet any of the exceptions list in Paragraph 145 of the NPPF and amounts to inappropriate development in the Green Belt. This is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

- Would there be harm to the Green Belt

Openness

Policy GE1 'Development in the Green Belt' of the UDP, states that development will not be permitted, except in very special circumstances, where it would: (a) lead to unrestricted growth of the built-up area; or (b) contribute towards merging of existing settlements; or (c) lead to encroachment of urban development into the countryside; or (d) compromise urban regeneration. Fundamentally, this is the same approach as paragraph 134. Allowing development only in very special circumstances accords with NPPF paragraph 143, and significant weight can be given to GE1.

Paragraph 134 states the Green Belt serves five purposes:

- a) To check the un-restricted sprawl of large built-up areas;
- b) To prevent neighbouring towns merging into one another;
- c) To assist in safeguarding the countryside from encroachment;
- d) To preserve the setting and special character of historic towns; and
- e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Paragraphs 145 and 146 of the NPPF, state that where development is allowable in the Green Belt, it should not have a greater impact on openness than the existing development or should preserve openness.

Openness is viewed as the absence of development. In this instance, the site at present consists of open countryside, which is confined by the existing stone wall/post and wire fence which encloses the site. The site creates a positive sense of openness and is viewable from a number of vantage points.

The proposed dwellings would be a permanent and substantial form of development which would stretch approximately 150 metres along the road frontage, where currently there is a significant gap in built form, but also 100 metres back into the site essentially being 3 houses deep.

The development would constitute urban sprawl bringing a significant development to an area of scattered homes that is physically isolated from the main urban area. In addition, the proposal site would be considered 'countryside' and certainly meets that Green Belt purpose. Almost all land within Sheffield's Green Belt can be considered to meet Green Belt purpose which relates to assisting urban regeneration by encouraging recycling of urban land – as by protecting land in the Green Belt, development is naturally funnelled into the urban area. Furthermore, the site is clearly open in nature, and the fundamental aim of Green Belts (NPPF para 133) is to prevent urban sprawl by keeping land permanently open.

Therefore, a significant loss of openness would occur in the Green Belt from the erection of 22 houses on this site, contrary to the fundamental aims of Green Belt policy as listed in paragraphs 133, 134.

Character and appearance

Policy GE2 of the UDP 'Protection and Improvement of the Green Belt' requires that measures shall be taken at part (a) to maintain and enhance those areas with a generally high landscape value. The NPPF at paragraph 141 states that Local Planning Authorities should plan positively to retain and enhance landscapes and visual amenity, which aligns with GE2, and significant weight can be afforded to GE2.

Policy GE8 'Areas of High Landscape Value and The Peak National Park' reinforces that in areas of high landscape value (AHLV), protection and enhancement of the landscape will be the overriding consideration. The policy is broadly consistent with the natural environment section of the NPPF which states that policies should protect and enhance valued landscapes. The AHLVs referred to in GE8 would be relevant to this. Further, para 172 of the NPPF specifically gives great weight to conserving and enhancing National Park landscapes. The National Park's landscape assessments recognise that landscapes extend beyond the National Park's boundary and therefore protection of those fringe landscapes through this policy is consistent with the approach in the NPPF.

This site is outside the Peak District National Park which is located approximately 500 metres to the west, and it does sit within the fringe landscape.

Indicative plans have been submitted and these show that the creation of 22 dwellings on this site would create a domestic activity which would envelope the site. This is through the buildings themselves, coupled with the individual boundary treatments, either soft or hard, garden equipment and play equipment, roads through the site, the presence of vehicles, street lighting and people movement.

The site is clearly seen from a range of viewpoints and is totally out of character with the surrounding forms of development. This suburban layout featuring 22 houses which extend deep into the site will have a far greater urbanising effect than the existing minimal levels of linear development which is concentrated mainly on the road frontage. This will have a significant impact on the character and appearance of the surrounding Green Belt, which will also impact on its openness.

Landscape and Visual Impact

A Landscape and Visual Impact Appraisal (LVIA) has been submitted with the application. This defines the site as being an open field in fair condition with no built structures, infrastructure, or vegetation on the site. The LVIA contains 8 viewpoints within a 2km study radius and assesses the impact of the proposal from these points.

The impact varies from 'negligible' whereby the development is not seen as a result of either elevated topography or areas of woodland between the site and viewpoint, to 'large adverse' impact from the nearest properties. However, it is clear that there are large areas from which the proposed development can be clearly be seen and will have an impact upon the landscape character. Considerable emphasis is placed within the LVIA on significant landscaping within the site, so that in the medium to long term, these landscape enhancements would mitigate the more prominent adverse landscape and visual impacts of the proposed development. The very fact that landscape works are necessary to mitigate the visual appearance of the development underlines the visual impact on the surrounding landscape.

As the application is for outline consent, the LVIA at Reserved matters stage could vary significantly on the design approach, scale, massing and layout of the development. However, at this outline stage, it is clear that there will be an unacceptable impact of erecting 22 houses on this site, on the surrounding landscape.

Sustainability

Paragraph 7 of the NPPF states 'The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs'. Paragraph 8 goes on to say at part c) environmental objective – to contribute to protecting and enhancing our natural, built and historic environment.

Development of this parcel of open countryside within the Green Belt, would not protect or enhance this natural environment and the site is not in a sustainable location.

- Other considerations which weigh in favour of the development

Paragraph 144 of the NPPF requires decision makers to ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not

exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

In this instance, two reports have been submitted by the applicant in support of the development. The first is a Very Special Circumstances Report (VSC) which was updated in October 2020 and highlights concerns about housing affordability nationally and in Sheffield, and most particularly in Dore and the south west of Sheffield. This was then supplemented with an additional report written by Lichfield's which proposes 13 of the 22 units to be affordable housing units, in the form of 4 older person units, 4 two-bedroom units and 5 three bedroom units

Several case studies are cited within these reports, but these are not comparable to this case. They are either based on land that was previously developed; or refer to instances where there is a significant lack of a 5-year housing supply; or where if there was a 5 year supply the scheme provided a substantial amount of housing (of 500+ units), meaning that any perceived benefits were considered to have much more significant impact.

The VSC report lists 50 items which the applicant stipulates are material considerations that contribute to the VSC of this application, and which give a positive impact in a balancing exercise.

These are categorised into the following main headings (with some of the subheadings in brackets):

- Policy and Green Belt Matters (The site does not strongly conform to the 5 Green Belt purposes, Sheffield has out of date Local Plan Policies, and cannot demonstrate a 5-year supply only having around 3.6 years).
- Housing Provision - Market, Affordable and Specialist Housing for Elderly People (On site contribution to market family housing, affordable housing for Dore and elderly occupants)
- Social Sustainability (Inclusive and mixed community, providing homes for those with protected characteristics, and support for local community services)
- Economic Stability (Economic stimulus to COVID recession, construction jobs, and generating an associated population to increase spending in the local area).
- Environmental Sustainability and Biodiversity Enhancements (Enhancement of the Local Wildlife Site, Bio-diversity net gain, networked green spaces, and the removal of invasive species)
- Water Drainage (Removes the pressure for development in higher risk Flood Zones in the city, and Sustainable Urban Drainage being proposed.)
- Landscape (Retention of key characteristics such as the stone boundary wall, and added value to local landscape)
- Sustainable Transport and Location (Long Line being well served by public transport links, improved public footpaths, potential traffic calming, on site electric car charging points)
- Architectural Design (Inclusive design, with market and affordable housing being indivisible from one another)

- Sustainable Energy (Low carbon energy supply and a reduction in carbon emissions).
- Financial Contributions. (A contribution to local council tax and a CIL contribution).

There are then 2 negatives which are listed as:

- Inappropriate development in the Green Belt (market housing does not fall under the exception text, however affordable housing does)
- Impact on openness (the proposal will impact on openness, but substantial weight is given to any harm through VSC).

Firstly, the VSC report by Lichfields gives a figure of 59% affordable housing provision within the scheme. It is important to note that this figure is derived by simply dividing the number of affordable units by the total number of units (13/22 = 59%).

The Community Infrastructure Levy and Planning Obligations Supplementary Planning Document (SPD) which includes Affordable Housing, calculates the percentage to be applied as a proportion of gross internal floor area rather than a percentage of unit numbers. The site plan submitted, indicates that of the 13 units, there are 4 bungalows, 5 x 3-bedroom units and 4 x 2-bedroom two storey smaller houses.

A further figure has been provided in the updated VSC report which gives 44% of the total gross floor space as affordable, and it is this figure which is most important and relevant to the policy.

The policy requirement as set out in the Community Infrastructure Levy and Planning Obligations SPD for this area is 30% and this would need to be calculated in full at reserved matters stage which would include detailed design. However, what is clear, is that this application is not seeking to provide 59% affordable housing, but closer to 44% depending on the final designs. On this basis this meets and exceeds the policy target for affordable housing on the site.

The vast majority of the 50 items referred to in the VSC report are not exceptional circumstances as they are all required to comply with policy, such as an energy efficient building, the contribution to CIL, bio-diversity net gain etc. A development of 22 houses, is not going to significantly boost spending in the local community or provide a significant amount of council tax revenue. These other considerations neither collectively nor individually outweigh the significant harm to the Green Belt as identified in the sections above, and nor do they demonstrate why this particular site is required to provide these other considerations.

- Whether very special circumstances exist.

As assessed in the sections above, the proposal would constitute inappropriate development, and substantial weight should be given to any harm in the Green Belt. Furthermore, there would be a loss of openness and visual intrusion into the character of the Green Belt. When taken individually or cumulatively, the other

considerations put forward by the applicant do not clearly outweigh the harm that has been identified. Consequently, the very special circumstances that are necessary to justify this inappropriate development in the Green Belt simply do not exist.

- Green Belt Balance.

The NPPF states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. As such, substantial weight should be given to any harm to the Green Belt and very special circumstances will not exist unless the potential harm by reason of inappropriateness is clearly outweighed by other considerations.

The proposal would be contrary to the relevant policies of the UDP and Core Strategy with respect of development within the Green Belt but, for the reasons set out above those policies are not up to date and have varying degrees of weight. In accordance with Paragraph 11(d) of the NPPF, where policies that are most relevant for determining an application are out of date, planning permission should be granted unless the application of policies in the NPPF that protect areas or assets of particular importance provide a clear reason for refusing the development. As listed in footnote 6 the Green Belt is one such protected area.

In this instance, the development would amount to inappropriate development within the Green Belt. This would impact on the openness and visual character of the Green Belt. The other considerations that would arise from the proposal are cumulatively of limited weight. They do not clearly outweigh the substantial weight that the NPPF requires to attach to the harm to the Green Belt through inappropriateness and loss of openness, nor the harm to the character and appearance of the area.

For the reasons set out above, the very special circumstances that are necessary to justify this inappropriate development in the Green Belt simply do not exist.

Therefore, the proposal is considered to be contrary to Policy GE1, GE2, GE3, GE4, GE5, GE8 of the UDP, Core Strategy CS71 and paragraph 134 and 143, 144 and 145 of the NPPF.

Residential Amenity

Policy H15 'Design of New Housing Developments' states that the design of new housing developments will be expected to provide adequate private gardens or communal open space to ensure that basic standards of daylight, privacy, security and outlook are met for all residents.

This is further supported by Supplementary Planning Guidance 'Designing House Extensions' (SPG) which whilst strictly relevant to house extensions, does lay out good practice detailed guidelines and principles for new build structures and their relationship to existing houses.

Paragraph 127 within the NPPF states that the planning system should always seek to secure a high standard of amenity for existing and future users.

These UDP policies are therefore considered to align with the requirement of paragraph 127 so should be given significant weight in the context of carrying out an analysis of whether a proposal complies with the development plan.

The closest neighbouring properties to the site are The Lodge, Standhills which is on the opposite side of Long Line; Holt House Farm which is to the south east of the site; and No's 125-139 Long Line which are to the north west of the site.

Whilst this is an outline planning application with details of layout, scale, design and landscaping being reserved for subsequent approval, the proposal will involve built development of dwellings and roads and the provision of drainage, open space and landscaping.

The application site is of sufficient size to ensure the proposed development can be accommodated and provide sufficient separation between proposed and existing buildings to ensure there would be no significant overlooking, overbearing or overshadowing of existing and future residents.

The proposal would cause noise and disturbance during the construction phase, and create noise and disturbance from the movements of people and vehicles during the operational phase when the dwellings are occupied, however such impacts would not be so significant as to harm the living conditions of existing residents in the locality. The impact on air quality would not be significant. The production and implementation of a Construction Environmental Management Plan (CEMP) would be required in the event of permission being granted.

It is considered that the proposed development would not significantly harm the living conditions of existing and future residents in the locality.

The proposal would, subject to satisfactory details at the reserved matters stage and the imposition of conditions, comply with UDP Policy H15, and paragraph 127 of the NPPF.

Design/Layout/Non-Green Belt Specific Character

Policy GE4 'Development and the Green Belt Environment' of the UDP states that the scale and character of any development which is permitted within the Green Belt, or would be conspicuous from it, should be in keeping with the area and, wherever possible, conserve and enhance the landscape and natural environment. Policy GE8 'Areas of High Landscape Value and The Peak National Park' requires that in Areas of High Landscape Value protection and enhancement of the landscape will be the overriding consideration.

More generally, BE5 'Building Design and Siting' of the UDP and CS74 'Design Principles' require high quality design and the use of good quality materials, which take advantage of and enhance the surrounding area.

Core Strategy Policy CS31 deals with housing in the south west area and this says that priority will be given to safeguarding and enhancing its areas of character. The policy defines "south west" as between the Manchester Road and Abbeydale Road corridors.

Chapter 12 of the NPPF aligns with the UDP and Core Strategy Policies and requires good design, whereby paragraph 124 states that good design is a key aspect of sustainable development and should contribute positively to making places better for people. Paragraph 130 requires that planning permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area. Paragraph 131 goes on to say that great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally so long as they fit in with the overall form and layout of their surroundings.

It is considered that the design policies within the UDP and Core Strategy reflect and align with the guidance in the NPPF, and therefore are considered consistent with it and so have full weight in the context of carrying out an analysis of whether or not a proposal complies with the development plan.

The character of the area is primarily rural, and the site is entirely within the Green Belt. Development along Long Line can be described as ribbon/ strip development.

The application is for outline consent only, and whilst an indicative plan has been submitted, the specifics of design and layout of the proposed development are subject to reserved matters stage approval only.

Setting aside matters of Green Belt policy conflict, a scheme could be developed that has a strong and positive frontage onto Long Line, including a well thought out boundary treatment which is likely to retain the existing stone wall. Overall heights and the scale of the proposed dwellings could be designed to mirror those found in the immediate area, which vary from single to two storey buildings. Furthermore, there is a variety of design styles and building materials in the locality.

However, what the indicative plans show is a layout which is suburban in character and does not reflect or reinforce the rural, ribbon pattern of development in the area. They show a scale of development which swamps the entire plot with suburban style housing, which is essentially 3 houses deep, and totally out of character with any other development along Long Line.

In conclusion, this application is just for outline consent, with all matters of design, layout and appearance subject to reserved matters stage. The general design and appearance of any future buildings could complement those within the surrounding street scene, however what is clear is that the layout for 22 houses, as per the indicative plans or a variation, show that in order to fit the 22 houses into the site, it will need to have a new road layout created which extends back into the site, creating a suburban style housing scheme. This is at odds with the overall character of the area.

This is contrary to Policies GE4, GE8, and BE5 of the UDP, Core Strategy Policies CS31 and CS74 and Chapter 12 of the NPPF.

Highways

Policy BE9 'Design for Vehicles' of the UDP requires that new developments should provide safe, and adequate parking provision including space to manoeuvre. UDP Policy 15 (Design of New Housing Developments), part (a), expects new development to provide easy access to homes and circulation around the site for people with disabilities or with prams. Policy CS53 'Management of Demand for Travel' of the Core Strategy seeks to make the best use of the road network, promote good quality public transport, walking and cycling and use travel plans to maximise use of sustainable forms of travel and mitigate the negative impacts of transport. Policy CS51 'Transport Priorities' identifies strategic transport priorities for the city, which include containing congestion levels and improving air quality.

The NPPF seeks in Chapter 9 (Promoting Sustainable Transport) to focus development in sustainable locations and make the fullest possible use of public transport, walking and cycling. It is important to note that paragraph 109 of the NPPF states that 'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.'

The UDP and Core Strategy policies broadly align with the aims the NPPF, although it should be noted that in respect of parking provision, the NPPF at paragraphs 105 and 106 requires consideration to be given to accessibility of the development, the development type, availability of public transport, local car ownership levels and states that maximum standards for residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or optimising density in locations well served by public transport.

The applicant proposes a priority junction onto Long Line to serve the 22 dwellings which would be an appropriate highway safety response in this situation. Visibility is good in both directions, but steps should be taken to enhance the area around the junction to ensure drivers on Long Line are aware of the junction.

What is clear is that there are no formal pedestrian facilities past the site on Long Line. Requiring the developer to provide facilities along the site's frontage would be of little benefit as there is no existing footway along the rest of Long Line for these facilities to tie into.

Long Line has an infrequent bus service. The No.181 runs Monday to Friday 3 times a day into Sheffield, and 2 times a day coming out of Sheffield. With this infrequent bus service, occupiers of the proposed development are more likely to use the stop on Hathersage Road which is approximately 700m from the site for more regular services on the wider network, but that this is still infrequent. This fact coupled with the lack of pedestrian facilities would suggest that the site will be car dependant.

The Council's revised parking guidelines set out maximum standards in accordance with Core Strategy Policy CS53, and for a 2-3-bedroom dwelling outside of the city centre 2 spaces are required as a maximum, with 1 space per 4 units for visitors. Taking parking ratios in isolation, and notwithstanding the issues relating to the design and the location off this site in the Green Belt, a scheme could be designed at reserved matters stage to maximum guidelines.

Even with a car dependant scheme which is designed to maximum standards, the traffic generation from this site for 22 dwelling, is not likely to be so significant as to pose a severe impact on the surrounding highway network, including at the junction with Hathersage Road and Long Line, which is already used frequently as a route from Dore to other areas of western Sheffield to the north and vice-versa.

The proposal therefore complies with UDP, Core Strategy and NPPF policies as listed above.

Affordable Housing

Core Strategy Policy CS40 states that all new housing developments over and including 15 units to contribute towards the provision of affordable housing where this is practicable and financially viable.

The Council's Community Infrastructure Levy and Planning Obligations Supplementary Planning Document (December 2015) includes guidance on affordable housing and is based on gross internal floor space.

The proposed development exceeds the 15 or more dwellings threshold and lies within an area where there is a required level of contribution of 30% identified in Guidelines GAH1 and GAH2 of the Planning Obligations document.

The applicant has confirmed that it is the intention to far exceed the policy requirement of 30% with 13 out of the 22 units being for affordable housing and it would not seem unrealistic to be able to achieve the 30% policy requirement which is based on a gross internal floor space.

This would need to be secured as part of a legal agreement should planning permission be granted.

The proposal would, therefore, comply with Core Strategy Policy CS40.

Ecology

UDP Policy GE11 'Nature Conservation and Development' states that the natural environment should be protected and enhanced and that the design, siting and landscaping of development needs to respect and promote nature conservation and include measures to reduce any potentially harmful effects of development on natural features of value.

GE11 aligns with the NPPF and is therefore relevant to this assessment. To clarify, NPPF paragraph 170 a) and d) identify that planning decisions should contribute to and enhance the natural and local environment, minimise impacts on and provide net gains in biodiversity. Furthermore, paragraph 175 a) identifies that if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused. Part d) of paragraph 175 goes on to state that opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.

The site and surrounding area is designated as a Local Wildlife Site in the Green Belt. It is in close proximity to two Natura 2000 sites to the west. These are a network of nature protection areas. These two sites are Peak District Moors (South Pennine Phase 1) Special Protection Area (SPA) and the South Pennine Moors Special Area of Conservation (SAC).

A Habitats Regulations Assessment (HRA) is used to determine if a plan or project may affect the protected features of a habitats site before deciding whether to permit it. All plans and projects (including planning applications) which are not directly connected with, or necessary for, the conservation management of a habitat site, require consideration of whether the plan or project is likely to have significant effects on that site. This consideration – typically referred to as the ‘Habitats Regulations Assessment screening’ – should take into account the potential effects both of the plan/project itself in combination with other plans or projects.

The National Planning Policy Guidance advises that where the potential for likely significant effects cannot be excluded, a ‘competent authority’ (in this case the LPA) must make an appropriate assessment of the implications of the plan or project for that site, in view of the site’s conservation objectives. The competent authority may agree to the plan or project only after having ruled out adverse effects on the integrity of the habitats site. Where an adverse effect on the site’s integrity cannot be ruled out, and where there are no alternative solutions, the plan or project can only proceed if there are imperative reasons of over-riding public interest and if the necessary compensatory measures can be secured.

A screening document for a Habitat Regulation Assessment (HRA) has been submitted and includes reference to the original ecological survey and a second updated survey. These documents have a lack of complete information about the main habitats on the site. Botanical surveys have been sub-optimal due being undertaken at the wrong time of year or following mowing. Furthermore, there is no reference to impact pathways, loss of supporting habitat, or potential impact of construction disturbance etc.

The applicant submitted an Addendum to the HRA on 16th November 2020. This has been reviewed by the Councils Ecologists and Natural England (following consultation). This Addendum does not address the poor quality of the screening submission including primarily, as previously advised, the poor base information used to determine that adverse effects cannot be ruled out. The Addendum seeks

to justify the initial view given rather than improve the base data on which the judgements and opinions are based. It uses the words “could use”, “potential”, “theoretical”, “may well provide potential” and this reiterates that existing survey data is simply not sufficient.

The Council’s Ecologists maintain the position that the information is insufficient to conclude that significant effects on the habitats and protected areas will not occur. Natural England advise in their response that if the Council remains uncertain about the potential impacts, based on the information provided, then further information is needed.

Owing to the overriding Green Belt issues as detailed above, this further information has not been requested from the developer.

Therefore, it is concluded that there is insufficient information on the exact nature of this habitat to enable a full assessment to be made.

- Biodiversity Net Gain

This is an outline application with all matters reserved except for access. An indicative site layout has been provided which shows dwelling positions, along with a Bio-diversity buffer area.

A Biodiversity Net Gain Assessment (BNG) should not be based upon an indicative site plan that is still to be decided at reserved matters stage. A BNG assessment at this stage should only include the baseline information and then show a worst-case scenario of 100% loss of biodiversity. However, although there cannot be a definitive BNG outcome in an outline application with all matters reserved there still needs to be a requirement for a BNG assessment to be completed at reserved matters stage, in addition to a Construction Environmental Management Plan relating to wildlife and habitats.

Landscaping

UDP Policy BE6 ‘Landscape Design’ expects good quality design in new developments in order to provide interesting and attractive environments, integrate existing landscape features, and enhance nature conservation.

CS74 ‘Design Principles’ part (a). requires high-quality development that will respect, take advantage of and enhance natural features of the City’s neighbourhoods.

These are the most important policies in the consideration of this application. They are considered to align with the NPPF and therefore be relevant to this assessment – on the basis that paragraph 127 c) expects new development to be sympathetic to local character, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change.

At present there are no trees or significant shrubs within the site, with it consisting of just open countryside/field. Landscaping is to be dealt with at reserved matters, but a suitable and appropriate landscaping scheme could be proposed.

Air Quality

UDP policies include Policies GE22 and GE23 relating to pollution and air pollution which 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.

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

An Air Quality Assessment is not required because of the scale of the development, the anticipated number of vehicles per hour and the site's position. A proposal for 22 houses is not likely to have a significant effect on local air quality. Condition(s) to secure a construction environmental management plan to mitigate the impact of dust during construction would be necessary in the event of planning permission being granted.

The proposal complies with UDP Policies GE22 and GE23, both of which carry weight in the decision-making process, and the Government's planning policy guidance on air pollution contained in the NPPF.

Flood Risk and Drainage

Policy CS67 'Flood Risk Management' of the Core Strategy states that the extent and impact of flooding should be reduced. It seeks to ensure that more vulnerable uses (including housing) are discouraged from areas with a high probability of flooding. It also seeks to reduce the extent and impact of flooding through a series of measures including limiting surface water runoff, through the use of Sustainable drainage systems (Suds), de-culverting watercourses where ever possible, within a general theme of guiding development to areas at the lowest flood risk.

Policy CS67 is considered to align with Section 14 of the NPPF. For example, paragraph 155 states that inappropriate development in areas at risk of flooding should be avoided and development should be directed away from areas at the highest risk. Paragraph 163 states that when determining applications, LPA's should ensure that flood risk is not increased elsewhere with relevant applications being supported by a Flood Risk Assessment. Paragraph 165 expects major developments to incorporate sustainable drainage systems unless there is clear evidence to demonstrate otherwise.

- Flood Risk

The site does not fall within a high or medium risk flood zone that would affect the principle of the development, however as the site is over 1 hectare in flood zone 1,

it has the potential to cause flooding elsewhere so does require a Flood Risk Assessment to be carried out. This demonstrates that the site is not likely to flood.

- Drainage

This area has a history of problems with the watercourse system therefore this site needs to manage its surface water to avoid any increase in flow.

Discharge via infiltration is unlikely to succeed owing to the prevalence of shallow watercourses within the area. Discharge to the watercourse (culvert) within the site is therefore the most sustainable solution and would need to be explored further at reserved matters stage.

The indicative plans have been amended to show a biodiversity zone which is now placed to the southern (low) side of the site. This could then be utilised for surface detention of flows in a wetland. Road surfaces could be built as lined permeable paving to provide treatment and storage. The sub-base can be upsized to accommodate roof water if unadopted by the Highway Authority. The density of this housing could allow a swale system to be developed to take road water either side the road. If surrounding levels are carefully considered around houses, then roof water could be directed to these swales on or near the surface.

Details of sustainable drainage (SUDS), drainage infrastructure management and discharge rates would be required with a reserved matters submission.

The Lead Local Flood Authority 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.

Therefore, if planning permission were to be granted, a suite of suitable drainage conditions could be attached to any approval, to be dealt with at Reserved Matters Stage.

Community Infrastructure Levy (CIL)

CIL has now been formally introduced; it applies to all new floor space and places a levy on all new development. The money raised will be put towards essential infrastructure needed across the city as a result of new development which could provide transport movements, school places, open space etc. 'In this instance the proposal falls within CIL Charging Zone 5. Within this zone there is a CIL charge of £80 per square metre, plus an additional charge associated with the national All-in Tender Price Index for the calendar year in which planning permission is granted, in accordance with Schedule 1 of The Community Infrastructure Levy Regulations 2010'.

SUMMARY AND CONCLUSION

This application seeks outline planning permission for erection of 22 houses in the Green Belt. It is only access which is to be dealt with at this outline stage, with all

other matters (appearance, landscaping, layout, and scale) to be dealt with at reserved matters stage.

An indicative plan has been submitted, and this demonstrates that the site can accommodate 22 houses in a layout that would provide good quality living accommodation and would not result in highway safety impact.

It is anticipated that a satisfactory solution to site drainage can be accommodated in a way that it doesn't result in flooding, with potential for bio-diversity net gain.

The creation of these 22 dwellings would be a relatively small but welcome contribution to city's housing supply, however this is limited as the Council can demonstrate a deliverable housing land supply of more than 5 years.

However, despite these benefits the site is a prominent Green Belt site in an Area of High Landscape Value, close to the boundary with Peak District National Park. In this instance, the development would amount to inappropriate development within the Green Belt. This would adversely impact on the openness and visual character of the Green Belt, essentially plugging a significant gap in the existing ribbon development which fronts on to Long line, in a manner that would be wholly out of character with the immediate location.

The other considerations which have been put forward by the applicant in their supporting statements are cumulatively of limited weight. They do not clearly outweigh the substantial weight that the NPPF requires to attach to the harm to the Green Belt through inappropriateness and loss of openness, nor the harm to the character and appearance of the area. Therefore, the very special circumstances that are necessary to justify this inappropriate development in the Green Belt simply do not exist.

Insufficient information has been submitted to enable a full and detailed assessment of the impact of the development on the natural environment (The Peak District Moors Special Protection Area and the South Pennine Moors Special Area of Conservation) in respect of a Habitats Regulation Assessment (HRA). The Local Planning Authority must therefore conclude that the proposed development is harmful to those habitats and therefore contrary to Policy GE11 of the Unitary Development Plan, and paragraphs 170 and 175 of the National Planning Policy Framework.

Therefore, overall although paragraph 11 of the NPPF promotes a presumption in favour of sustainable development, paragraphs 113, 143, 144, 145, 170 and 175 of the NPPF provide a clear reason for resisting the development, and the adverse impacts of granting development significantly outweigh the benefits.

The proposal is therefore contrary to policies CS24, CS31, CS71, CS74 of the Core Strategy, Policies GE1, GE2, GE3, GE4, GE5, GE8, GE11 and BE5 of the Unitary Development Plan and Paragraphs 117, 122, 134, 143, 144, 145, 170 and 175 of the National Planning Policy Framework, and it is recommended that planning permission is refused.

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