

Representation on the Sheffield Plan Publication (Pre-Submission) Draft

Respondent details

Comment ID number: PDSP.386.001

What is your Name: Springwelldweller

If you are making this representation as a member of an organisation, what is the name of your organisation:

N/A

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

N/A

Document

Which document to you wish to make a representation on:

Annex A: Site Allocations

Which section of the document is your representation on:

Policy SA5: Southeast Sheffield

Which paragraph/site/map layer of the document is representation on:

SES03

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

Objection to Sheffield City Council's Proposal in the Sheffield Draft Development Plan to designate an area adjacent to Springwell Grove, Beighton and Eckington Way Beighton (Known as SES03) as an industrial development and traveller/showpeople site.

I do not believe this part of the plan follows current central government policy or Sheffield City Council policy and is unsound in a number of areas. I outline my objections below:

1. Non-compliance with the stated aims and objectives of the draft plan.

2. Non-compliance with Local and National Policies on the Protection of Open Spaces

3. Use of Green Belt Land

4. Lack of meaningful consultation with local people/impact on the local area

5. Becton Centre – Impact on Clients and Patients

6. Value of Agricultural land - Agricultural Land Survey

7. Increase in road traffic and traffic pollution

8. Financial Cost of Developing this Greenfield Site

9. Other potential traveller sites/other industrial sites

10. Lack of objective, recorded and auditable process and criteria for selecting SES03 in Beighton as a traveller site in preference to any other site.

11. Summary

1. Non-compliance with the stated aims and objectives of the draft plan

The project to develop this greenfield site contradicts the Council's own policy on promotion of brownfield development:

In the aims and objectives of the draft plan p15-17 it states the Council will “...cherish protect and enhance its biodiversity and green and blue infrastructure” and maximise the use of previously developed land”.

The development is a 'significant development' as defined in part 2 p.13 table 1 and does indeed take up a greenfield area, and does not 'maximise the use of previously developed land'.

The following decision was taken on Thursday 3 November 2022 by the Transport, Regeneration and Climate Policy Committee to promote the use of Brownfield sites over Greenfield

<http://democracy.sheffield.gov.uk/documents/g8507/Decisions%20Thursday%2003-Nov-2022%2009.30%20Transport%20Regeneration%20and%20Climate%20Policy%20Committee.pdf?T=2>

5.3.4 b Releasing greenfield land in the Green Belt for development now has a high risk of undermining efforts to reuse the substantial supply of brownfield sites in the City Centre and other parts of the urban area. It would also cause significant harm to the city's biodiversity and would undermine the city's reputation as the 'Outdoor City'. The adverse impacts of meeting the full need therefore significantly and demonstrably outweigh the benefits of meeting the need for housing and other development when all factors are considered.

There are 335 Brownfield sites within the Sheffield area (source: National Housing Federation) which could be considered.

The land assists in safeguarding the countryside from encroachment (your development) and has beneficial countryside uses,

- public rights of way and informal rights of way around the site,
- habitat connectivity from Crystal Peak Meadows to Linley Bank and to Beighton Orchard Local Wildlife Site,
- retention of hedgerows, presumably in good condition to promote wildlife diversity.
- agriculture – the land is in regular agricultural use for crops and is currently under cultivation.

This is a greenfield site which does not appear historically to have been anything other than farmland.

2. Non-compliance with Local and National Policies on the Protection of Open Spaces

2.1 A Green Future: Our 25 Year Plan to improve the Environment (DEFRA2018)
A Green Future: Our 25 Year Plan to Improve the Environment sets out the government's 25-year plan to improve the health of the environment by using natural resources more sustainably and efficiently in order to:

- protect the best agricultural land
- put a value on soils as part of our natural capital

Additionally, the above Guidance states that Local Planning Authorities (LPAs) should

- consider the economic and other benefits of BMV agricultural land, and try to use areas of poorer quality land instead of higher quality land

2.2 National Planning Policy Framework (NPPF) (MHCLG 2012)

<https://www.gov.uk/government/publications/national-planning-policy-framework--2>
LPAs should use the NPPF to make decisions about the natural and local environment to:

- protect and enhance landscapes, biodiversity, geology and soils
- recognise soils as a natural capital asset that provide important ecosystem services
- consider the economic and other benefits of BMV agricultural land, and try to use areas of poorer quality land instead of higher quality land
- prevent soil, air, water, or noise pollution, or land instability from new and existing development

2.3 Sheffield City Council Core Strategy

<https://www.sheffield.gov.uk/sites/default/files/2022-07/core-strategy-adopted-march-2009.pdf>

The Councils strategy is stated to be to protect open spaces:

s.9.21 One of the most significant contributions of planning to open space provision in the city is the safeguarding of what we already have. Once built upon, open space is likely to be lost to the community forever. Safeguarding open space is therefore vital in ensuring that there is sufficient quantity, and especially to meet the needs of local people. National planning policy presumes against building on open spaces.

Additionally, the strategy states:

Open space.... beyond the city will be safeguarded and development or redevelopment will be permitted only where it would improve the quality of facilities provided in the city.

This space, SES03, fits the definition of 'informal space' as outlined in the core strategy, (policy CS47) as there are numerous formal and informal routes around the site, as can be seen by aerial photographs and the relevant OS map, the site is a wildlife corridor between adjacent local nature reserves and sites, the proposed uses of this site will break or impede its use of as a wildlife corridor site.

3. Use of Green Belt Land

This land appears to me to be designated as part of the 'Green Belt' area in the latest green belt review, dated September 2020, although statements to the contrary were made by the panel at the recent Westfield consultation meeting.

<https://www.sheffield.gov.uk/sites/default/files/docs/planning-and-development/draft%20sheffield%20plan/Green%20Belt%20Review%2021%20September%202021.pdf>

'Land to the East of Eckington Way size 6.86 ha'/SES03 is stated in Appendix 19 of the Review above to be "" included within SE4b", the parcel of land to the north of the SES03.

The parcel of land in question, SE-4-b and the 'Land to the East of Eckington' way both score an identical 2/1/5/5 in the scoring matrix – and both are shown the same colour shade in the rating maps in that document.

If SES03 is included within SE-4-b and scores exactly the same as SE-4-b then it surely must have the same green belt status as SE-4-b – unless someone has made a subjective decision to remove it?

Additionally the Independent Impact Assessment associated with the plan clearly identifies the land SES03 as part of the green belt, both on the map on page 21 (identified as area 5) and on the table on page 29.

4. Lack of meaningful consultation with local people/impact on the local area
There seems to have been no meaningful consultation [REDACTED]

[REDACTED] (local councillors as an exception), who was aware of this draft or proposal before I was alerted [REDACTED] in late January. This policy has apparently been 10 years in the making, and only 6 weeks has been allowed to prepare objections, this has given no time for local people to organise or carry out our own surveys on traffic noise, pollution etc.

I can categorically state that no-one [REDACTED] that I have met wants this development on that site.

I would support this by reference to the several local petitions against the provision of this site: (Names were still being added to one of them as I added these details)
<https://democracy.sheffield.gov.uk/mgEPetitionDisplay.aspx?ID=10275&RPID=10476137&HPID=10476137>

We the undersigned petition the council to remove the proposed travellers site from Beighton and relocate it to a more suitable location in Sheffield. 2823 signatures
<https://democracy.sheffield.gov.uk/mgEPetitionDisplay.aspx?ID=10278&RPID=10476073&HPID=10476073>

We the undersigned petition the council to change the decision to place an industrial site in the local plan behind Springwell Grove - 635 signatures
<https://democracy.sheffield.gov.uk/mgEPetitionDisplay.aspx?ID=10277&RPID=10475959&HPID=10475959>

We the undersigned petition the council to oppose the proposed traveller site at Eckington Way – 645 signatures still open as of 13.02.23

There do not appear to be any petitions in favour of it!

5. Becton Centre – Impact on clients and patients

The recently expanded Becton Centre for Children and Young People, which provides:

- Child and Community Adolescent Mental Health Services (CAMHS)
- Child and adolescent psychiatry
- Community mental health services
- Inpatient facilities for persons with eating disorders
- Self-harm services

is located adjacent to the southern edge of the site, separated only by a footpath.

The Centre provides mental health services to vulnerable young people and the impact of increased noise, air and light pollution will only negatively affect their health and mental health.

6. Value of agricultural land - Agricultural Land Survey

The current Defra information classes SES03 grade as 3b, 'good to moderate quality agricultural land', recent crops on these fields have included wheat, runner beans and oilseed rape

Oil seed rape is one of the defining crops for category 3a land, which would raise it to that category; lifting the land to category 3a would place it in the higher BMV (Best and most Versatile) grading of land, and more deserving of protection from development.

Current Guidance to Assessing Development Proposals on agricultural land
February 2021

<https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land#:~:text=4.3%20Grade%203%20%E2%80%93%20good%20to,in%20grades%201%20and%202.>

7. Increase in road traffic and traffic pollution

Within the last 10 years there have been additional new developments including:

- three supermarkets
- a filling station
- drive through outlets (with another nearing completion on Sevenairs road shortly).

• expansion of the Becton Centre/Community Hospital
which have contributed towards increased traffic flow along this route.

Additionally, the recent reopening of two food/licensed premises, at the Sevenairs Road/ Eckington Way roundabout, which both attract a great deal of road traffic, has also increased traffic flow to a higher level.

Providing a Traveller/Showpeoples site and/or industrial businesses at the site 'SES03' will only serve to increase the already congested traffic situation.

7.1 Air pollution, fumes, exhaust gasses and particulates

Existing traffic volume and the slow moving/static nature of traffic at many times of day and at weekends has already increased the level of air pollution in the vicinity of Eckington Way. Walking on those footpaths provided during peak times and breathing in the pollution will demonstrate this fact, more so for children who are at a lower height, where the pollutants are more concentrated.

This existing problem will be made worse by the development of the site as a traveller site/industrial area.

The current presumed access to the site, the existing roundabout adjacent to the Aldi Supermarket, off Eckington Way B6053 is extremely busy at most times of the day, the flow of traffic to Crystal Peaks Shopping Centre, Drakehouse Retail Park and the Asda Supermarket is already very high.

It is increasingly difficult to exit Sevenairs road in a vehicle or to cross Eckington Way as a pedestrian.

Stationary/slow moving traffic, especially travel to work times and at the weekend already tails back both ways, to/from the junction with the A57, and across the tramline at the Junction with West Street, Beighton.

A survey of air quality in current conditions and a report on projected changes is strongly recommended as this has not been carried out since 2015.

7.2 Noise Pollution

Traffic volume is already noticeable from a distance of 100m in Springwell Grove: an increase in traffic volume (already an issue) and new site traffic will be detrimental to site neighbours.

Further development in the area, on site SES03 will inevitably lead to an increase in traffic, from employees, business customers, travellers' deliveries, waste disposal etc. which will be detrimental to site neighbours

Additionally, there is also significant noise from light industrial activities from the neighbouring site at Drakehouse

7.3 Light Pollution

As the proposed site is mainly at a higher elevation than the adjacent residential area, the required provision of 'street'/external lighting to the proposed site will present problems of light pollution to the adjacent area and impact negatively on the quality of life of residents.

7.4 Vehicle Parking

Any development of the site SES03 would lead to Springwell Grove becoming a car park, impacting the quality of life of residents – the footpath running from Springwell Grove alongside the site and providing access to the site will encourage Springwell Grove's use as a car park by customers/clients/employees of businesses, travellers and any other site users.

This occurs in Sevenairs Road, where Crystal Peaks employees and tram users now park vehicles for the day, the owners of Crystal Peaks having introduced a time limit on the use of their car parks.

The council has acknowledged this as an issue in Sevenairs Road by introducing parking restrictions on one or both sides of the road.

8. Financial Cost of Developing this Greenfield Site

The following will be required for the site:

- Access road 3.7m wide
- Hardstanding for caravans, commercial vehicles car parking for businesses.
- 'street' lighting for the whole site
- Communal facilities in permanent structures to service the traveller site.
- Provision of a new mains water supply
- Provision of a new mains sewerage/drainage supply, this will need to incorporate at additional cost of an interceptor facility for ensuring that oils, fuels, traffic film etc in run off from show peoples vehicles/rides does not pollute the drainage system or local watercourses or the land itself
- Provision of new electrical supply/new substation
- Provision of new gas supply

The cost of delivering the Traveller/industrial site would be considerable on this greenfield site as there is no existing infrastructure and greater than developing a brownfield site where some or all of these facilities may already be available.

9. Other potential traveller sites/other industrial sites

There is already a traveller facility at Halfway, the area does not 'need' another site, but if further provision was deemed necessary additional space could be found on the Holbrook Industrial Estate (I understand the existing traveller site at site can't be extended in its location), but further facilities could be located on nearby or adjacent land. East and West of New Street/south of the Shortbrook and on the East side of Rother Valley Way appears to have 'spare' land available which could be considered/assessed.

10. Lack of objective, recorded, auditable and systematic process and criteria for selecting SES03 in Beighton as a traveller site in preference to any other site

It was not demonstrated at the Local Area Meeting at Westfield whether a systematic, objective assessment process had been carried out (and recorded) of potential traveller sites throughout the city area to arrive at the conclusion that this particular site was the very 'best' available in the whole of Sheffield City area.

Bland assertions that other sites had been 'considered' as were given verbally at the meeting are not sufficient to establish good governance on this issue, auditable evidence of a proper process is required.

The proposed site SES03 has the following negative issues as a location, which would need to be included in any formal assessment:

- A site exposed to high winds, not best for caravans.
- Adjacent to HV cables producing significant amounts of EMF radiation.
- Another Traveller facility within one mile.
- A road already choked with traffic as an access point – the levels of pollution would make it a poor site to live on, especially for children.
- Additional N02, particulate, noise and light pollution associated with an industrial/traveller/ show-people's site, including the cleaning servicing and maintenance of vehicles/rides.
- Adjacent to an established residential site, which it overlooks, which would constitute a lack of amenity to people already living there.
- Significant active opposition has been demonstrated by local people, almost 3000 of whom have signed a petition to oppose the development of the site.
- Proposed site is Grade 3 (possibly grade 3a "Best and Most Valuable") agricultural land
- Being established on a greenfield (Greenbelt?) site rather than a brownfield site, use of which is both Sheffield CC a and national government policy.

11. Summary

- Developing this site as an industrial area/traveller site contradicts both local and national government policy on preserving open areas and countryside and cuts across council decisions to prioritise the redevelopment of the (335) brownfield sites within Sheffield.
- From the Councils Greenbelt review this land parcel appears to be included within the acknowledged adjacent greenbelt area SE-4-b, and has exactly the same matrix scores SE-4-b, so looks to have been assessed as part of the green belt.
- Meaningful consultation, incorporation of local opinion and consideration of the negative impact of this development is lacking in the proposal, the council must realise that this development is not wanted locally, offers no benefit to local people and will be vigorously opposed at all stages.
- The negative impact of more development (noise, pollution etc.) on the adjacent Becton Centre's vulnerable clients/patients does not appear to have been considered.
- Use of valuable grade 3 (possibly 3a 'Best and Most Versatile'), agricultural land which once absorbed cannot be reclaimed
- The increased level of traffic both at peak travel to work times and weekends is already a problem, due to continuing development on Drakehouse and neighbouring sites. Levels of N02, particulates and noise can only increase with more development. The increased activity and development will also increase light pollution and use of residential areas as car parks. The development also overlooks the adjacent estate, with consequent loss of privacy/amenity.
- The financial impact of developing this greenfield site, which has no utility infrastructure will obviously be higher than that for a brownfield site where these facilities may already be available.
- A site for travellers has been provided less than a mile away at Halfway/Holbrook, so this area already has provision for local travellers, however

there is land available close by that site at Holbrook to provide additional facilities if they are deemed necessary.

- There is no evidence that an objective, recorded and auditable assessment process has taken place to determine which is the best site in Sheffield for the traveller site, and why Beighton was selected for that site.
- There is no evidence that an objective, recorded and auditable assessment process has taken place to determine that SES03 is the best site for the industrial development.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

1. Remove the proposed development from the plan as an interim measure.
2. Confirm Greenbelt status of site, as laid out in the Greenbelt Review and Impact Assessment, this will enable a more accurate assessment to take place under 3 below
3. Formally consider and objectively assess and record the selection of the most appropriate site in Sheffield for the traveller/showpeoples site and for the industrial development taking into account:
Suitability of site for living accommodation for travellers, and the availability of existing local facilities
Compliance with government and council policies on preserving green spaces and prioritisation of brownfield site use
Preservation of greenbelt
Preservation of grade 3 farmland for agricultural use
Current and potential levels of traffic pollution
Noise and light pollution from potential development
Impact on and wishes of local community, including the Becton Centre
Financial impact of selecting greenfield/brownfield re: service/utility provision
Environmental/wildlife impact and impact on wildlife corridors
This will demonstrate that all relevant factors have been taken into account for the selection of the site for this development
4. Review traffic pollution and flow issues around the potential new site, consider what measures need to be taken to reduce pollution and congestion before considering increasing the traffic burden in the area.
This will demonstrate that proper assessment and planning has taken place to manage existing and potential future traffic issues.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s):

Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

I think this proposal for SES03 is unjustified and there are surely better sites in the Sheffield area for it. I wish to be present to ensure that full explanations are given and there is an opportunity to ask questions and clarify matters around green be