

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: Allocation of land to the east of Moor Valley Road S20 5DZ
Date: 21 March 2023 14:32:53
Importance: High

Dear Laura,

Thank you for your email.

I have agreed to put forward a collective response [REDACTED]
[REDACTED]

Relating to regulation 19: 'Consultation is carried out with the purpose of seeking the views of residents, businesses and stakeholders as to whether the Local Plan Reviews are legally compliant and have been positively prepared, are justified, effective and/or are consistent with national and regional policy'.

[REDACTED] I am surprised that we were not written to directly. We only found out about the proposals via a leaflet which was posted through our door a couple of weeks ago. I personally do not subscribe to the media sites you are referring to.

Therefore, could you please ensure that all our objections to the proposal are put forward and confirm that a more appropriate communication will be sent to [REDACTED] of [REDACTED] I'm unsure if [REDACTED] are aware of the proposed plans and/or the public meeting which is taking place tomorrow.

I think you would agree that it is only proper that [REDACTED] be given the correct opportunity to voice their opinions and concerns.

I will myself be attending the meeting tomorrow to get a better understanding of the process.

Many thanks

Prof. & Mrs Digman [REDACTED]
[REDACTED]
[REDACTED]

From: SheffieldPlan <sheffieldplan@sheffield.gov.uk>
Sent: 21 March 2023 09:33
To: 'wtsutherland' <[REDACTED]>
Cc: [REDACTED]; Chris Digman
[REDACTED]
Subject: RE: Allocation of land to the east of Moor Valley Road S20 5DZ

Dear Mr Sutherland

Regulation 19 consultation on the Publication Draft Sheffield Plan took place between 9th January and 20th February and has now closed. The consultation was publicised across a range of media and included a number of in-person and online events including two public meetings in the south east of the city. We may be able

to add your objection to the proposal to develop this site alongside other late responses, however it will be up to the Planning Inspector to determine whether late responses are considered. Please let us know if you would like to submit this as a formal objection.

Best wishes, Laura

From: wtsutherland [REDACTED]

Sent: 20 March 2023 11:59

To: [REDACTED]; [REDACTED]

Cc: [REDACTED]

Subject: Allocation of land to the east of Moor Valley Road S20 5DZ

Dear Jayne,

I wish to add to the concerns raised by Professor Chris Digman and Alison Digman regarding the potential development of land east of Moor Valley Road.

I agree that the "Site Selection Methodology site appraisal (Sheffield Plan - Publication (Pre Submission) Draft)" of the site, has many inconsistencies in the decision making process. I would also agree that [REDACTED] we are very aware of the ecological importance of this land within the area. The diversity of fauna and flora is incredible and well documented through various studies.

I would draw the attention of [REDACTED] to a letter he sent to [REDACTED]. The letter guaranteed that the land would never be developed. It was green belt and for grazing purposes, livestock have regularly grazed on the land. Sheep were last grazing just a couple of months ago.

In your response to [REDACTED] you wrote *"I have previously spoken with colleagues within the Planning service who have informed me that the consultation period ended on the 21st Feb 2023 but they would submit late objections through to the allocated government inspector. It would be down to the inspector to decide if they would accept the late objections and comments."*

I have included the planning service in this email as they would be the best people to speak with regarding your concerns."

None of us were aware of the consultation, how can it have been closed on 21st February 2023 when we were not informed or given an opportunity to raise our concerns.

Kind Regards

[REDACTED]
Sent from my iPhone

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From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Allocation of land to the east of Moor Valley Road, S20 5DZ
Date: 12 April 2023 19:25:28
Attachments: [Review of allocation in Sheffield Local Plan of land to the East of Moor Valley - Objection April 2023.pdf](#)

Dear Jayne,

Thankyou for your recent email. Apologies for not responding sooner, [REDACTED]

I felt it was appropriate to consolidate our objection to the allocation, and provide evidence on the grounds of the information provided in the plan and evaluations of the land are not correct in line with the methodologies outlined within the Sheffield City Plan, and therefore should be shared with the allocated government inspector. To that end, I attach our review of the land allocation with evidence that I believe the inspector should be provided with.

Just to note I have not received any information back from Sheffield City Council via the Sheffield Plan inbox, but trust this objection with the evidence will be passed on, but would welcome any advice you can provide please to confirm it has been passed on.

I am submitting this on behalf of [REDACTED]

Best wishes

Prof. Chris Digman

BEng (Hons), PhD, CEng, FICE, FCIWEM

From: [REDACTED]
Sent: 20 March 2023 08:46
To: [REDACTED]
[REDACTED]
Cc: [REDACTED]
Subject: RE: Allocation of land to the east of Moor Valley Road, S20 5DZ

Dear Prof and Mrs Digman,

Thank you for your recent email. I have forwarded your comments to the Sheffield plan inbox. I have previously spoken with colleagues within the Planning service who have informed me that the consultation period ended on the 21st Feb 2023 but they would submit late objections through to the allocated government inspector. It would be down to the inspector to decided if they would accept the late objections and comments.

I have included the planning service in this email as they would be the best people to speak with regarding your concerns.

Many thanks

Jayne

From: [REDACTED]
Sent: 19 March 2023 17:03
To: [REDACTED]
Cc: [REDACTED]
Subject: Allocation of land to the east of Moor Valley Road, S20 5DZ

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Dear Clive and Jayne,

We wanted to register our objection and concern to the recent allocation of land off Moor Valley with the proposal to place 150 densely packed houses and destroy the ecology and land that was under agreement with Natural England. We live on [REDACTED] and therefore are very aware of the

ecological importance of this land within the area.

Having initially reviewed the "Site Selection Methodology site appraisal (Sheffield Plan - Publication (Pre Submission) Draft)" of the site, we would question and wish to see further evidence that enabled the conclusion to be reached, noting there are various inconsistencies in the decision.

[f9b64eb3eb8103a644a27a9b660acff6_Draft_Sheffield_Plan_-_Annex_A_-_Site_Allocations_-_ONLINE.pdf \(amazonaws.com\)](#)

We would welcome a meeting to discuss the matter.

Best wishes

Prof. Chris Digman and Mrs Alison Digman

BEng (Hons), PhD, CEng, FICE, FCIWEM

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Review of allocation of land to the East of Moor Valley and objection to its proposed allocation within the proposed Sheffield Local Plan.

April 2023

Prof. Chris Digman, BEng, (Hons), PhD, FICE, FCIWEM

Overview of objection to the inclusion of land to the east of Moor Valley close in the local plan allocation

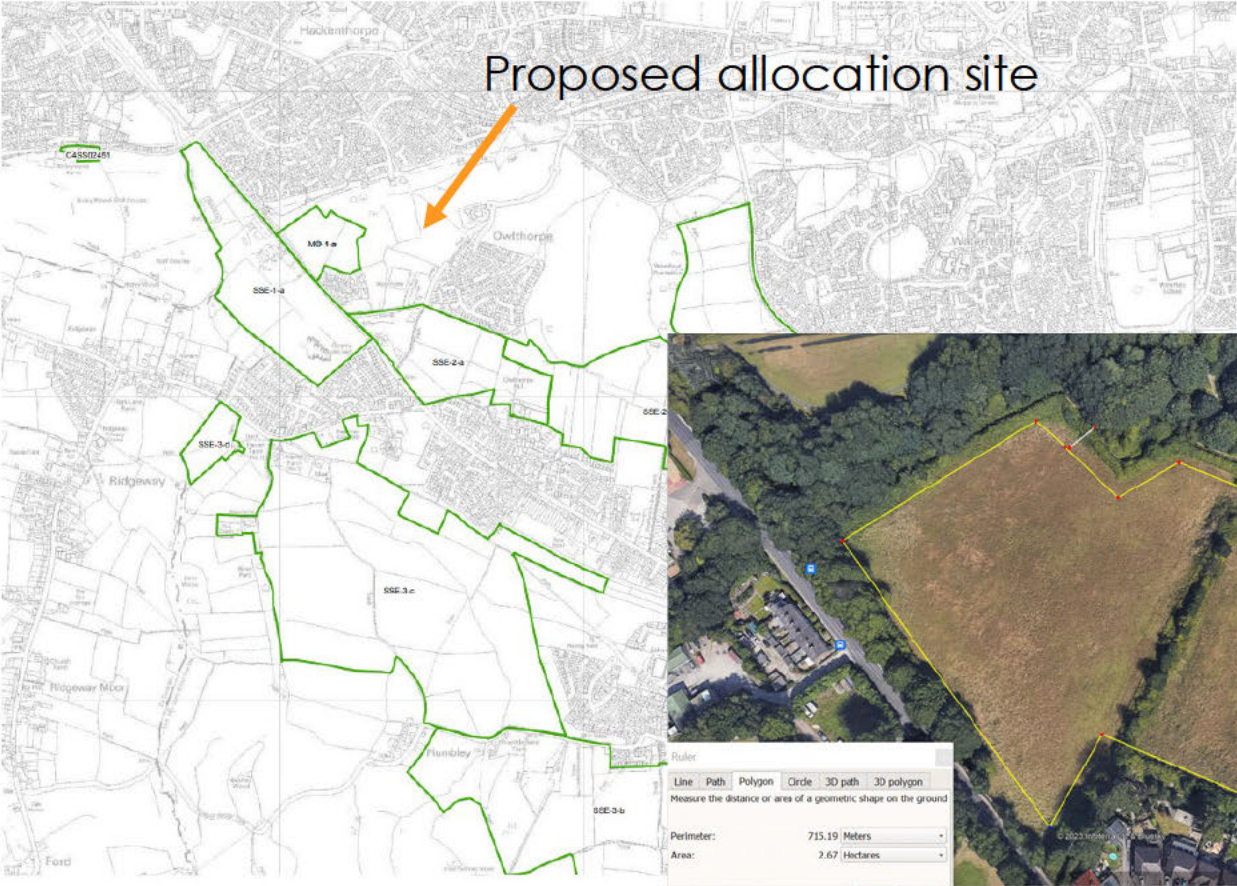
- This document outlines our objection to the inclusion of the land to the east of Moor Valley in the local plan.
- The land is within 60m of 275kv overhead cables, which typically would have been excluded from being considered as an allocation according to Sheffield City Council's methodology.
- The proposed land has been under a Natural England Higher Level Stewardship Agreement for the last 10 years and neighbours a designated Local Wildlife Site.
- The actual land available is far smaller than suggested in the detailed evaluation, estimated to be by circa 25% resulting in less homes.
- Our objection is based on the ecological impact this will cause and that Sheffield City Council has not correctly applied and/or made incorrect evaluations in the process of including the land in the draft local plan, and may have reached an alternative decision to not include the land within the allocation.

Contents

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5	Inclusion of land within 60m of 275kv Overhead cables.
6	Review of Suitability Assessment Evaluation indicated two areas which we believe are incorrectly categorised – ecology and impact on rural landscape character.
7	Impact on rural landscape character assessment resulted in a lower score than should have been determined
8	Texture - support information to character assessment
9	Public and Private View - support information to character assessment
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12	Documents and websites referred to

Site location where land to the east of Moor Valley assessed. The size of land available has not been correctly assessed.

Land Parcel proposal MO-1-A as identified in the greenbelt review and subsequent site reference and site appraisal front cover (right). Note we believe the size of the land parcel available is far smaller than indicated at 3.8ha, rather circa 2.7ha, if buffers are set in place as required on the conditions (e.g. 15m from woodland, 10 from watercourse) and existing trees and hedge rows are not removed, meaning the number of homes is significantly overestimated.



Site Selection Methodology site appraisal (Sheffield Plan - Publication (Pre-Submission) Draft)

Site Reference: S02900 / SES10

Address: Land to the east of Moor Valley Road, S20 5DZ

Gross site area: 4.20 Hectares

Housing area : 3.80 Hectares

Estimated housing capacity: 151 homes

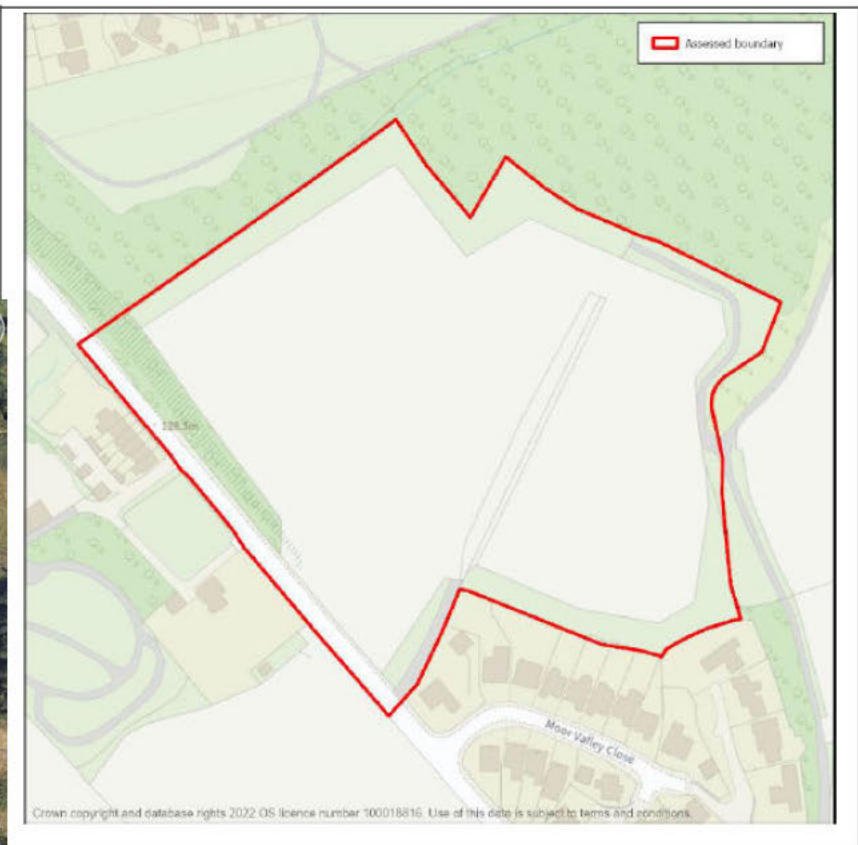
Net employment (Class E(g)(i & ii)) area: 0.00 Hectares

Net employment (Class B2, B8 & E(g)(iii)) area: 0.00 Hectares

Net (Other employment uses) area: 0.00 Hectares

Assessed uses: Housing

Recommendation: Allocate site for Housing use



Inclusion of land within 60m of 275kv Overhead cables.

Reference to overhead cable proximity is not included within subsequent information reviewed. Clear evidence should be provided that demonstrates why this land had been included and other sites excluded. Where included, this proximity should be carried forward into more detailed assessment, including the suitability assessment.

Section 3.19* (Other Environmentally Sensitive or Constrained Areas) outlines:

"The Working Group also agreed that, as a general rule, it would be undesirable to build housing on other land that is either environmentally sensitive, important for outdoor recreation or in areas where the living environment would be unsatisfactory. Such sites would be likely to be regarded as unsuitable for housing when assessed through the development plan process because there would be more suitable alternatives available.

It was therefore agreed that, in most instances, the following areas would be mapped and excluded from the assessment:"

Including

"Land within 60 metres of existing 275kV and 400kV high-voltage overhead power lines and within 30m of 132kV, 110kV and 66kV overhead power lines¹² was also mapped. This enabled the identification of areas where overhead power lines would be a potential constraint to development".

*Sheffield Housing and Economic Land Availability Assessment December 2022



Review of Suitability Assessment Evaluation indicated two areas which we believe are incorrectly categorised – ecology and impact on rural landscape character.

Impact on rural landscape character.

- The scores do not align with the available evidence.
- The score indicated as medium capacity but amended to higher capacity with no justification for change.
- A review of the scores indicates that a higher score should have been assigned to the site.

Impact on ecology/local nature recovery networks

- An indicator score of N does not appear to take into the wider ecological value of the land as indicated being assigned a Higher Level Stewardship Agreement with Natural England in 2013, which neighbour's designated Local Wildlife Sites to the North and East.

Indicator	Indicator score	Indicator score result
Contribution to housing led regeneration	-	Development would not regenerate a previous housing site
Proximity to incompatible uses	YY	More than 100m from an incompatible use
Loss of onsite Open Space	YY	No open space on-site
Sufficient existing Open Space in the surrounding area	NN	Insufficient open space - more than 20% below policy standard
Loss of community/leisure /recreation facilities	YY	No facility on-site
Distance to core public transport network (CPTN)	YY	The site is within Core Public Transport Network buffer
Use of Previously Developed Land (PDL)	NN	Development on predominantly greenfield land
Loss of best and most versatile agricultural land	-	Likely to be Grade 3 land but site-specific survey required to determine whether any Grade 3a land
Impact on heritage assets	Y	No designated heritage assets in the vicinity of the site that are likely to be affected by development
Archaeology constraints	-	Uncertain level of archaeological constraints
Impact on rural landscape character	Y	Landscape has higher capacity for absorbing development
Impact on ecology/local nature recovery networks	N	Site is likely to have a significant ecological value

Impact on rural landscape character assessment* resulted in a lower score than should have been determined

We agree with a number of the category assessments but question the following categories with supporting evidence on the following pages. We propose after reviewing other sites scores, that the “medium” rating would have been correct and not changed to higher. Our assessment has been made following Sheffield City Council’s methodology**.

Our review indicates that a score of 25-26 should have been given, and this when compared with other assessments, the capacity should have been “low” or “medium” and not revised to “Higher” :

- Texture – A score of 1 given but given this land was under a Higher Level Stewardship Scheme and the margins and a central strip dividing the land in two are clearly left to mature and should have a score of 2 “Rough, usually contained managed but some areas untended or abandoned,”
- Openness to public view – A score of 1 given but the land can be seen from 3 sides, with footpaths around the edge to the North and East and fully visible from the west along Moor Valley. Note as the land slopes away, over 50% of the site is visible from the highway and footpath on Moor Valley. A score of 2 should have been assigned “Area is partially contained from public views; Area is moderately open to public views,”
- Openness to private view – A score of 1 has been given however the land is predominantly lower than properties on Moor Valley, with the top floors of properties over 12m above the land proposed therefore offering no privacy for many proposed properties. Even gardens in Moor Valley Close are 3-6m higher, therefore there will be limited privacy for any properties neighbouring properties on Moor Valley Close. A score of 2 should have been assigned “Area is partially contained from public views; Area is moderately open to public views,”
- Scope to mitigate the development – A score of 1 given. Considering that land is bound by nearly 60% woodland and grazing land, and the requirement for 40 homes per ha, and the need for open green space in development, a score of 2 or 3 would be more appropriate for the development to keep within the existing landscape pattern (e.g. score of “2 = Moderate scope to provide mitigation in the medium term broadly in keeping with existing landscape pattern,” **)

* Landscape Character and Green Belt Capacity Study (April 2018) Appendix 3, Page 193
 ** Landscape Character and Green Belt Capacity Study (April 2018) Appendix 1-2, Pages 34-42

SITE	MO1a		Rating
CRITERIA GROUP		CRITERIA	
1,Significant Existing Landscape Features	Landform		1
	Enclosure		1
	Scale		1
	Variety		3
	Texture		1
	Condition/Harmony		3
	Sub Total 1		10
2a,Visual Factors	Openness to public view		1
	Openness to private view		1
	Views from / towards landmark buildings / landscapes		1
	Relationship with existing urban built form/edge		2
	Prevention of merging/ coalescence		2
	Sub Total 2a		7
2b, Mitigation	Scope to mitigate the development		1
2b, Mitigation	Sub Total 2b		1
Landscape Sensitivity Profile (1+2)			18
3, Landscape Value	Designations etc.		1
	LCA Type UP3 Degree of tranquillity, remoteness, wildness or scenic beauty		2
	Sub Total 3		3
Overall Capacity Profile (1+2+3)		Total 1 + 2 + 3	21

Preliminary landscape and capacity rating based on raw score

Medium

Recorded primary criteria

0

Final relative landscape capacity rating

Higher

Texture - support information

Texture – A score of 1 given but given this land was under a Higher Level Stewardship Scheme and the margins and a central strip dividing the land in two are clearly left to mature and should have a score of 2* “Rough, usually contained managed but some areas untended or abandoned,”

Image top right shows a view of the land from Moor Valley in November 2022, showing the land is more applicable to a score of two (November 2022).

Image bottom right showing the view from the edge of the Local Wildlife site towards Moor Valley Close and Moor Valley (April 2023).

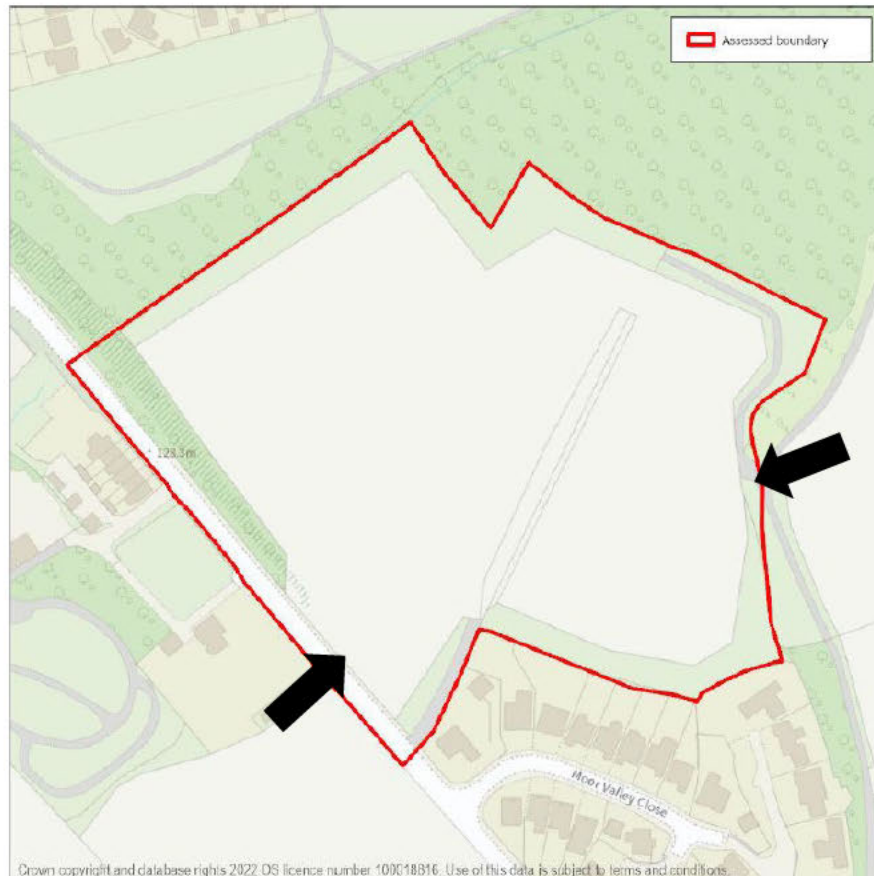


Photo locations



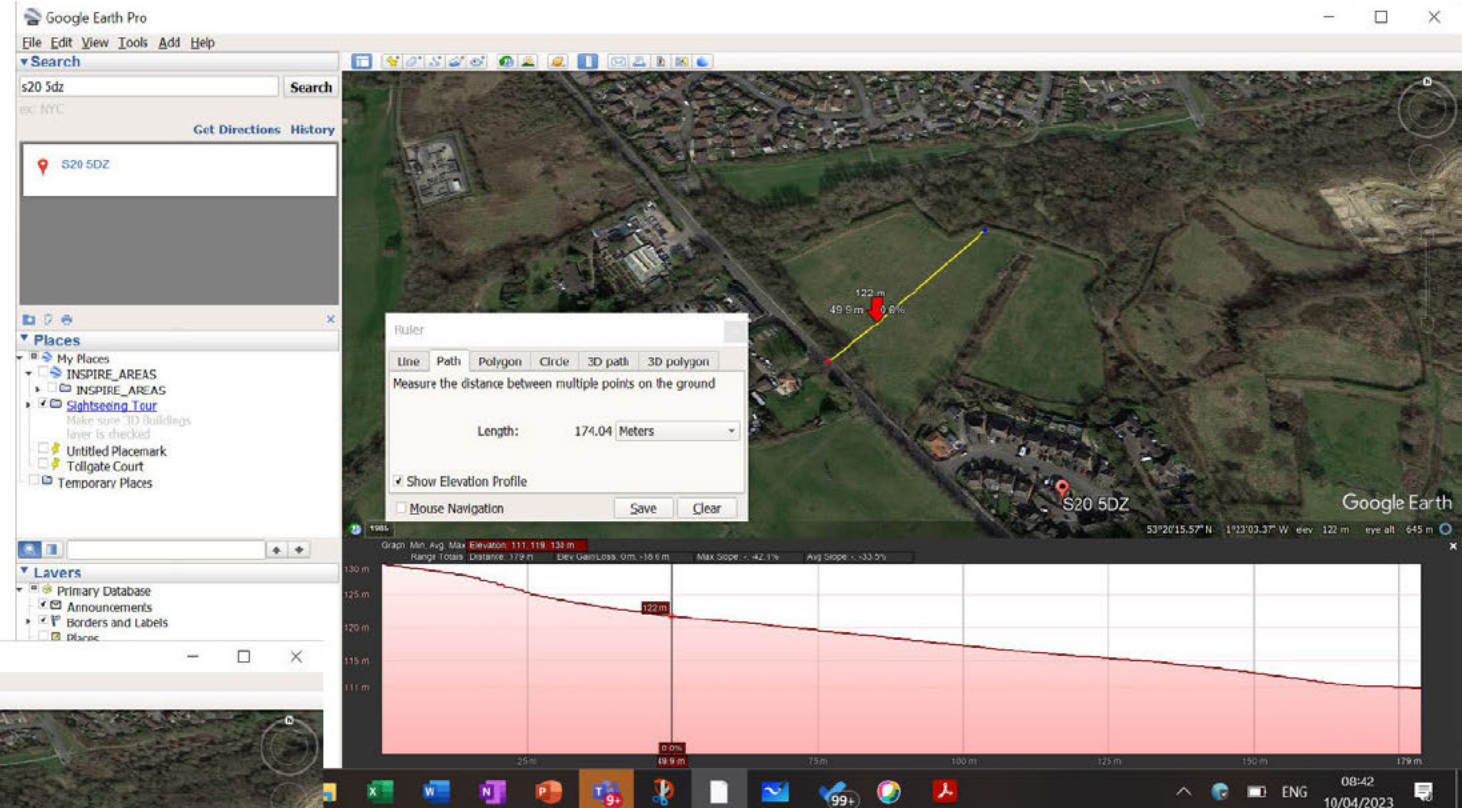
* Landscape Character and Green Belt Capacity Study (April 2018) Appendix 1-2, Pages 39



Public and Private View - support information

Openness to public view – A score of 1 given but the land can be seen from 3 sides, with footpaths around the edge to the North and East and fully visible from the west along Moor Valley. Note as the land slopes away, over 50% of the site is visible from the highway and footpath on Moor Valley. A score of 2 should have been assigned “Area is partially contained from public views; Area is moderately open to public views,”

Image right shows the drop in elevation and visibility of the land from the highway on Moor Valley.



Openness to private view – A score of 1 has been given however the land is predominantly lower than properties on Moor Valley, with the top floors of properties over 12m above the land proposed therefore offering no privacy for many proposed properties. Even gardens in Moor Valley Close are 3-6m higher, therefore there will be limited privacy for any properties neighbouring properties on Moor Valley Close. A score of 2 should have been assigned “Area is partially contained from public views; Area is moderately open to public views,”

Image left shows the significant change in ground level elevation from Moor Valley Close properties to the land allocated.

Scope to mitigate development - support information

Scope to mitigate the development – A score of 1 given. Considering that land is bound by nearly 60% woodland and grazing land, and the requirement for 40 homes per ha, and the need for open green space in development, a score of 2 or 3 would be more appropriate for the development to keep within the existing landscape pattern.

Page 41 states A score of “2 = Moderate scope to provide mitigation in the medium term broadly in keeping with existing landscape pattern” and a score of “3 = Limited scope to provide adequate mitigation in keeping with the existing landscape in the medium term; Very limited scope to provide adequate mitigation in the medium to long term”)

It also states in the category for Scope to mitigate development “Considers whether landscape measures appropriate to the landscape pattern and character e.g. woodland planting, could be introduced to mitigate the effects of development.”

Mitigation such as further woodland planting (appropriate for the local landscape and character) would take circa 15-20 years to establish considering the scale and time to mature. Therefore a score of 2 or 3 should have been applied considering it is likely that mitigation would only occur over the long term.

* *Landscape Character and Green Belt Capacity Study (April 2018) Appendix 1-2, Pages 34-42*



View of Moor Valley to the North from Moor Valley Close

View of land from Moor Valley



Review of the impact on ecology/local nature recovery networks in the Site

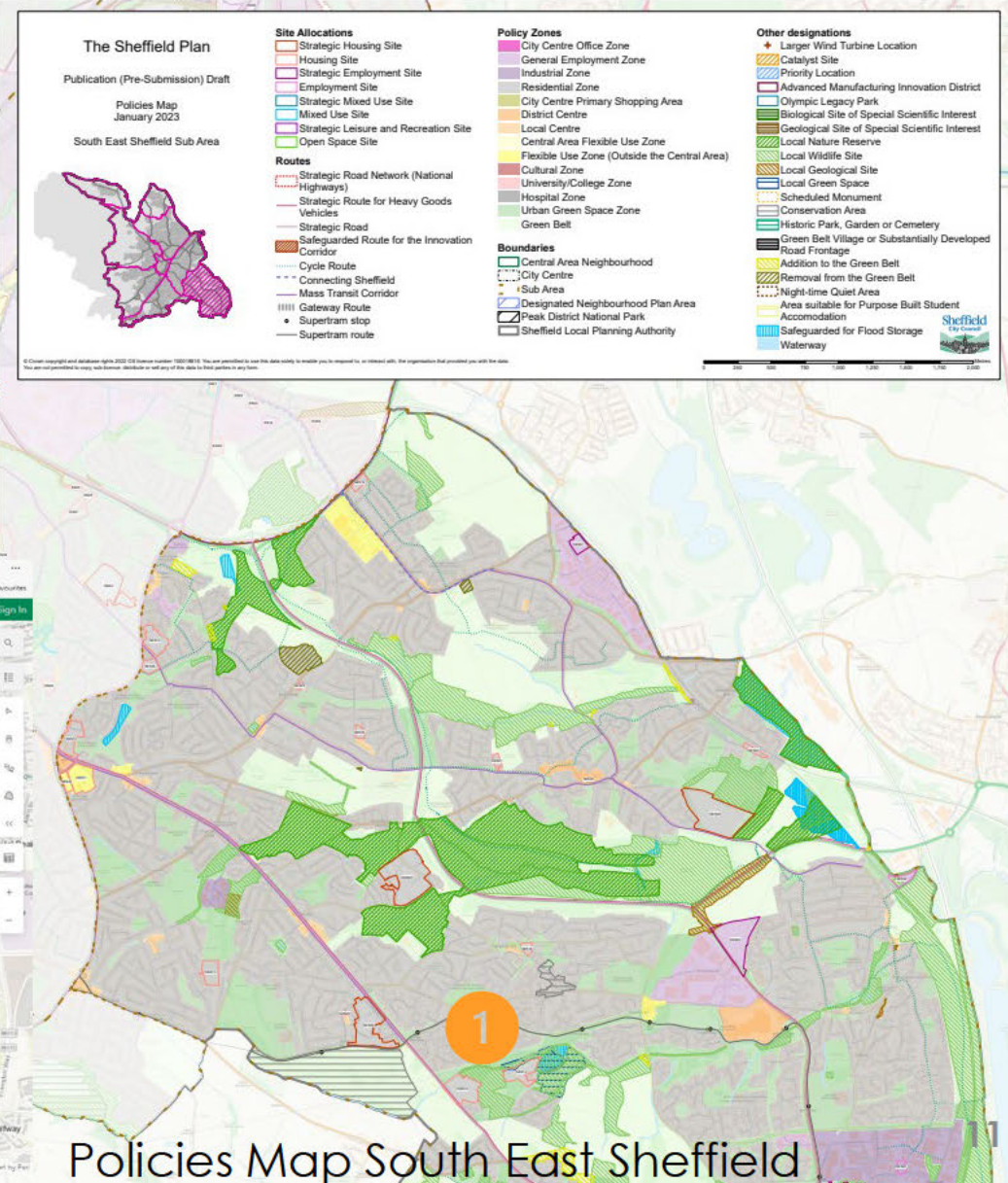
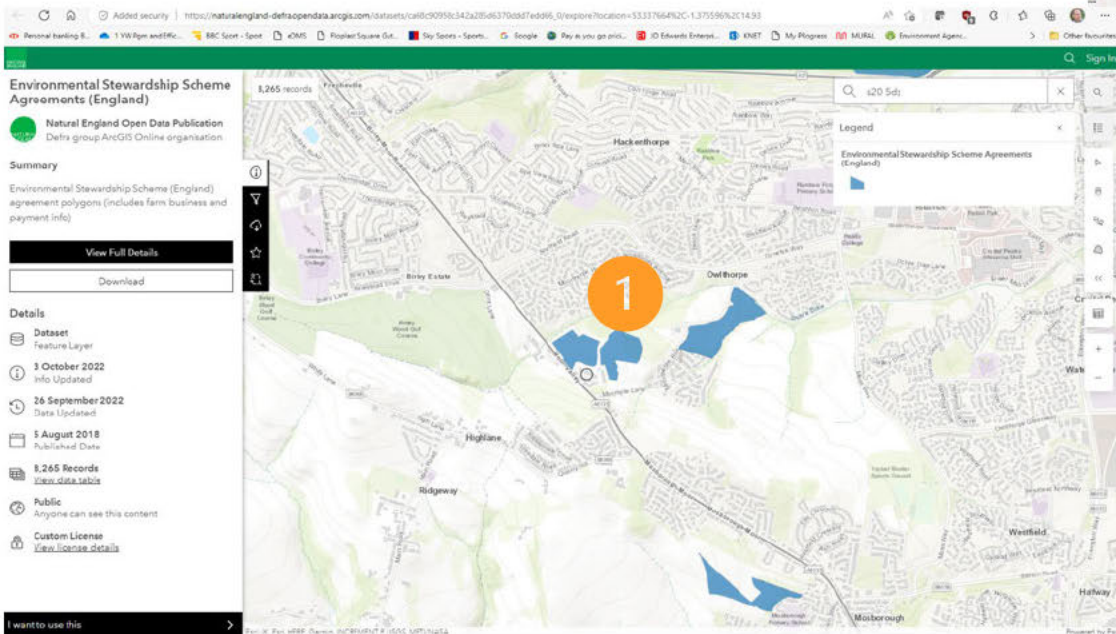
Selection Methodology Site Appraisal

An indicator score of N does not appear to take into the wider ecological value of the land as indicated being assigned a Higher Level Stewardship Agreement with Natural England in 2013. It is unknown whether an extension has also been applied for or gained for a further 5 years*.

Image on the right shows the local wildlife sites** which overlap with the Higher Level Stewardship Scheme area (1) indicated in the image below***. With the stewardship scheme, this has protected the land and encouraged both ecological improvement on the land and the surrounding Local Wildlife Site. The land proposed to be allocated is circa 40% of the immediate Local Wildlife Site to the North and East.

Whilst the site itself does not have a designation, the loss of the land type would significantly erode the ecology and continued recovery in the area, considering also the recent loss to further development further to the east. Therefore it is reasonable to assume that agreement to improve the local environment would have an effect on the local wildlife site and should have been categorised as “NN” in the indicator score of the suitability assessment within the Site Selection Methodology Site Appraisal of the land and taken into account in the decision making.

- <https://www.gov.uk/guidance/higher-level-stewardship-2023-agreement-extensions>
- **
- <https://haveyoursay.sheffield.gov.uk/20435/widgets/58316/documents/36301>
- ***
- https://naturalengland-defra.opendata.arcgis.com/datasets/ca68c90958c342a285d6370ddd7ed66_0/explore?location=52.802477%2C-2.469330%2C7.81



Policies Map South East Sheffield

Documents and websites referred to

- The Sheffield Plan: Our City, Our Future Sheffield Housing and Economic Land Availability Assessment December 2022
- The Sheffield Plan: Publication (Pre-Submission) Draft Policies Map, January 2023, South East Sheffield Sub Area
- The Sheffield Plan: Our City, Our Future, Site Selection Methodology, January 2023
- The Sheffield Plan: Our City, Our Future Publication (Pre-Submission) Draft Annex A: Site Allocations Schedule, December 2022 (Page 182)
- Site Selection Methodology site appraisal (Sheffield Plan - Publication (PreSubmission) Draft) Site Reference: S02900 / SES10
<http://www.arcgis.com/sharing/rest/content/items/804ad6169ae0486eaecf95f1da5d1979/data>
- Sheffield Landscape Character & Green Belt Capacity Study, April 2018
- Environmental Stewardship Scheme Agreements (England) https://naturalengland-defra.opendata.arcgis.com/datasets/ca68c90958c342a285d6370ddd7edd66_0/explore?location=52.802477%2C-2.469330%2C7.81
- Higher Level Stewardship 2023: agreement extensions <https://www.gov.uk/guidance/higher-level-stewardship-2023-agreement-extensions>