

Our ref: General/40b – Planning Conformity/Final Response/Sheffield, Renewable Energy Plant, Alsing Road April 08

2 May 2008

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Dear Howard

Application reference: 08/01225/OUT

Erection of a renewable energy plant with associated flood management works, landscaping and improvements to an existing access at Former Blackburn Meadows Power Station Site, Alsing Road, Sheffield.

The Assembly, as the Regional Planning Body, has been asked to comment on this development as its nature and location mean that it could have an effect on the implementation of the Regional Spatial Strategy (RSS). The current RSS for Yorkshire and Humber (based on the Selective Review of RPG12) was issued by the Secretary of State in December 2004. The RSS has the status of a Development Plan Document and forms part of the framework for decisions taken under section 38 of the Planning and Compulsory Purchase Act (2004), which means that decisions on all applications have to be taken in accordance with the Development Plan unless other material considerations indicate otherwise.

The Planning and Compulsory Purchase Act (2004) and Circular 08/2005 make it clear that a draft RSS submitted to the Secretary of State is a relevant regional policy against which strategic applications can be considered. This Assembly response therefore also highlights relevant issues that arise from the Yorkshire and Humber Plan (draft RSS) December 2005 – the RSS submitted to the Secretary of State.

Please note that the Secretary of State's Proposed Changes to Draft RSS have now been published (September 2007). Government guidance (paragraph 4.19 in PPS12) states: "Where the regional spatial strategy...has been through an Examination in Public, and the proposed changes have been published, considerable weight may be attached to that strategy because of the strong possibility that it will be published in that form by the Secretary of State".

Assembly responses to consultations on strategic applications will therefore have to make it clear how the Proposed Changes impact on the policies quoted and to point out to local authorities that 'considerable weight' will need to be attached to them by the decision-making body and by Inspectors at Examinations of DPDs and application Inquiries. At the same time, it should be noted that the Assembly itself has made comments on the Proposed Changes and that the final version of the new RSS is expected in spring 2008.

Both the existing and draft regional spatial strategies aim to achieve a more sustainable pattern and form of development, investment and activity across the region, putting a greater emphasis on matching needs across the region with opportunities and managing the environment as a key resource. There is a particular emphasis on achieving the regeneration and renaissance of the region's city and town centres by making them the focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities in the region (for example Policy P1, existing RSS, December 2004 and Policy YH5, Draft RSS, December 2005).

In seeking the implementation of these policies across the region, the Assembly therefore offers the following comments on the proposed renewable energy plant.

Regional Policy Context

Policies in the current RSS (December 2004) seek to focus development on the region's town and city centres, reduce the need to travel, ensure that development is accessible by a range of transport modes and support the renaissance and regeneration of the region's urban centres by promoting high quality developments that reflect the scale and character of the centres to which they relate (see, for example, policies P1, S4, E1, SOC3, T1, T2).

Policies in draft RSS (December 2005) build on these principles. The Core Approach (Policies YH1 – YH9) makes it clear that most new development, and high trip generating uses, should be focused on Regional and Sub-Regional Centres and that away from these sufficient development should be permitted in Principal Service Centres to enable them to fulfil their role as service centres (Policy YH8 building on policies YH5, YH6 and YH7 and Policies E2 and T1).

Both current and draft RSS discourage development of Greenfield land, and state that priority should in fact be given to the re-use of Brownfield sites within settlements. Second priority should be given to other suitable infill opportunities, and thirdly, to planned growth areas. The proposed site is on Greenfield land.

It should be noted that the Secretary of State's Proposed Changes to draft RSS (2007) replaces the terms "Regional Centres" with "Regional Cities", "Sub Regional

Centres" with "Sub Regional Cities and Towns" and "Principal Service Centres" with "Principal Towns". The Core Approach of draft RSS is not changed by the Proposed Changes.

Location of Development

Policy YH3 relates to the key spatial priorities and provides all plans, strategies, major investment decisions and programmes in the Region will aim to transform economic, environmental and social conditions in the older industrialised parts of South Yorkshire and the Humber. The Secretary of State's Proposed Changes to draft RSS (2007) provides for the transformation of economic, environmental and social conditions in the Regeneration Priority Areas in the older industrialised parts of South Yorkshire in Policy YH1.

Economic Considerations

Policy E1 of draft RSS (2005) states that in order to create a more successful and competitive regional economy, all plans, strategies, major investment decisions and programmes in the Region will aim to promote opportunities for business relating to the Region's unique environmental assets and challenges, including sustainable construction, renewable energy, resource and waste efficiency and environmental technologies and the 'low carbon economy'.

Renewable Energy

Policy YH2 provides for all plans, strategies, investment decisions and programmes in the Region to help meet the Region's target to reduce greenhouse gas emissions by at least 20% below 1990 levels by 2010 and 25% below 1990 levels by 2015 by increasing renewable energy capacity and carbon capture. It should be noted that the Secretary of State's Proposed Changes to draft RSS (2007) remove these targets; however the emphasis on increasing renewable energy and carbon capture has remained unchanged.

Current RSS Policy R12 states that development plans should include measures that help secure a target installed renewable energy generation capacity of 674 MW for the Yorkshire and Humber region. It also sets a renewable energy target for South Yorkshire of 100MW by 2010, equating to 22% of the total regional target. Draft RSS also sets a target for installed renewable energy capacity in Sheffield of 10.6MW by 2010 (Table 15.12, Policy ENV5). Policy R12 of current RSS (2004) also states that development plans should include measures that maximise the use of renewable energy resources and technologies such as biomass.

The Regional Energy Infrastructure Strategy (November 2006) has three key objectives:

- Lead the way in delivering secure regional and national energy supplies;
- Promote the reduction in energy demand through efficiency in supply and transmission;
- Maximise low carbon energy generation.

The Regional Energy Forum is supporting primary developments that promote extensive regional bioenergy infrastructure that include the widespread production and use of biomass and biofuels.

The Secretary of State's Proposed Changes to Draft RSS (2007) Policy ENV5 sets South Yorkshire a target of at least 47MW by 2010 and 160MW for installed grid connected renewable capacity. Table 15.12 recommends a renewable energy target in Sheffield of 11MW to 2010 and 52MW to 2021

The application will help to meet these challenging targets and therefore supports the implementation of the RSS.

Location & Landscape

Current RSS (Policy R12c) states that development plans should include locational and environmental criteria to be applied in securing the sub-regional targets, maximising the use of renewable energy resources. The draft RSS (2005) builds on this and states that it is a local authority's role to identify the preferred type, scale and locations for renewable energy and to also provide supplementary locational and environmental criteria to be used in assessing such development as needed. The Secretary of State's Proposed Changes to draft RSS (2007) states that local authorities have an important role to promote renewable energy development, ideally with other authorities on a sub regional basis, and provide supplementary locational and environmental criteria to be used in assessing such development as needed.

The applicant has undertaken a Landscape and Visual Assessment which concluded that generally the proposed Plant would have a moderate impact on the residential and open spaces and only a slight adverse landscape and visual impact on industrial areas and the supporting highway infrastructure.

The local authority will have to take this (and any other relevant local context) into account in reaching its decision.

Flood Risk

Current RSS (Policy R2) states that a sequential risk-based approach to planning for flood risk should be taken and that development in high flood risk areas should be avoided. Draft RSS policy (Policy ENV1) states that development in high flood risk areas should be avoided where possible and flood management should be undertaken pro-actively. ENV1 of draft RSS (December 2005) specifies that flood management will be required to facilitate development in the city of Leeds. The Secretary of State's Proposed Changes to draft RSS (2007) states that the Region will manage flood risk pro-actively by reducing causes of flooding to existing and future development, especially in tidal areas, and avoid development in high flood risk areas.

The applicant has also undertaken a Flood Risk Assessment, as the development area is located in Flood Risk Zone 3 (high risk). Development is not normally acceptable in this zone, however the applicant states that development of associated flood management works will reduce the risks. The local authority will have to take this (and any other relevant local context) into account in reaching its decision.

Accessibility

Accessibility criteria are set out in both the current and draft RSS (Table 7.1 and 7.2 of current RSS and Table 16.8 and 16.9 of draft RSS). These tables include

acceptable walking and overall journey times for the population that would be travelling to the site. It should be noted that the Secretary of State's Proposed Changes to draft RSS (2007) makes no recommendations with regard to these criteria.

It is not clear from the application whether or not an assessment against the accessibility criteria has been carried out.

Car Parking

Policy T2 of the draft RSS states that the maximum parking standards for new developments must be in line with Table 16.5. There is not sufficient detail provided with the application to assess whether this be the case.

It should be noted that the Secretary of State's Proposed Changes to draft RSS (2007) makes no recommendations with regard to these criteria.

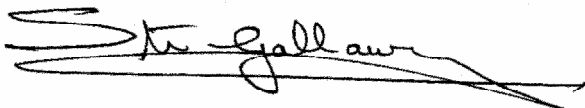
Conclusion

Given the issues set out above, the Assembly offers the following comments that:

- This development is supported in principle by the Assembly as helping to implement the RSS by providing renewable energy generation.
- Local landscape assessments and Flood Risk Assessments will have to be taken into account by the local authority in reaching its decision.

If you have any queries about these points, please do not hesitate to contact Andy Haigh on 01924 331601.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Stephen Galloway', with a long horizontal flourish extending to the right.

Stephen Galloway
Chair, Regional Planning Board
Yorkshire and Humber Assembly