



Response to LPA's Intention to Refuse

**APPLICATION 2026/0643 - RESIDENTIAL DEVELOPMENT OF ONE
DWELLING (PERMISSION IN PRINCIPLE)**

LAND ADJACENT FINKLE STREET LANE, WORTLEY, SHEFFIELD

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Response to Second Planning Policy Consultation and Case Officer's Intention to Refuse

This supplementary statement is submitted further to the second Planning Policy consultation response dated 7 September 2026, the Connectivity Tool information subsequently provided by the LPA, and notification from the case officer in an email dated 15 September that the LPA is minded to refuse the application on the basis of Policy GB7(1)(g)(iii) of the National Planning Policy Framework ("the Framework").

Having considered that additional material, we respectfully maintain that there is no sound policy basis for concluding that the application site is not in a sustainable location for the single dwelling proposed.

Matters of common ground

It is important at the outset to identify the substantial matters which are no longer in dispute. The LPA accepts that the application site constitutes grey belt. It is also accepted that the site does not strongly contribute to Green Belt purposes (a), (b) or (d), that the site is not part of an open rural setting but lies within the existing hamlet, that any harm arising from countryside encroachment would be limited, and that any harm in relation to Green Belt purpose (e) would also be limited.

It is also accepted that there is an evidenced unmet housing need. The LPA cannot demonstrate a five-year housing land supply, with its published position being only 2.9 years, and its Housing Delivery Test performance was 75%.

Sustainability

The sole matter preventing the LPA from accepting the proposal under GB7(1)(g) is therefore criterion (iii): whether the development would be in a sustainable location, with particular reference to Policy TR3.

That issue needs to be considered in the context of what is actually proposed, i.e. one dwelling within an existing hamlet.

The LPA's original sustainability assessment was based on an incorrect matter of fact. The first Planning Policy response stated unequivocally that:

"There is no public transport provision in the vicinity of the application site."

As explained in our previous response, that factual premise was incorrect. Bus stops exist approximately 80 metres from the application site, in both directions on Finkle Street Lane.

That is now accepted by the LPA. The second planning policy response acknowledges both the nearby bus stops and that they are served by services 23, 23a, 26 and 34, providing public transport opportunities towards Deepcar and Barnsley.

The issue has therefore changed materially. It is no longer whether public transport exists, but whether its frequency, when considered alongside the site's other accessibility characteristics and the very limited scale of development proposed, is sufficient for the site to constitute a sustainable location.

TR3 does not establish a requirement that every residential development must be located where occupiers can undertake every journey without using a private car. Nor does it establish a minimum bus frequency or minimum Connectivity Tool score.

Instead, TR3(1) expressly requires its principles to be applied *"taking into account the vision for the site, the type of development and its location."* That qualification is particularly important here.

TR3(1)(a), which contains the requirement for a location to limit the need to travel particularly by private car and offer a genuine choice of transport modes, expressly applies

to development proposals which could generate a significant amount of movement, in the context of the area within which they would be situated.

The proposal is for one dwelling.

There is no evidence that a single dwelling would generate a “significant amount of movement” in the context of Finkle Street Lane. Indeed, our previous response specifically drew attention to the very limited number of journeys which a single dwelling would generate.

The NPPF requires a proportionate assessment which has regard to the type and scale of development and its rural location.

Furthermore, TR3(1)(e) specifically addresses rural areas, stating that opportunities to improve walking, cycling and public transport and enhance connectivity should be taken where they exist and can be supported by the development proposed.

The NPPF, therefore, plainly recognises that accessibility and sustainable transport considerations must be assessed in their geographical context rather than by applying urban accessibility expectations indiscriminately to rural locations.

Connectivity Tool

The Connectivity Tool relied on by the LPA does not establish that the site is unsustainable. The case officer's email places significant reliance upon the Connectivity Tool. It states that the site has an overall score of 29, which is said to “*suggest that the site is in an unsustainable location*”.

That is not how the Department for Transport says its Connectivity Tool should be interpreted.

Instead, the Connectivity Tool should be used alongside other relevant quantitative or qualitative evidence in assessing the connectivity of particular locations proposed for development.

More importantly, the DfT's published guidance expressly warns against precisely the type of isolated interpretation apparently being applied here. The guidance confirms that a Connectivity Tool score is a relative, not absolute, measure, that a score cannot by itself establish whether connectivity is "good" or "bad", that the most useful comparison will often be with places having the same rural-urban classification, that the score should be used alongside local evidence, site knowledge and professional judgement, and critically, *"The connectivity score does not give a final judgement on whether a location is suitable for development"*.

The LPA's submitted Connectivity Tool extract does not undertake that contextual assessment. Page 1 simply identifies an overall score of 29 and places it within the lowest national decile.

That national comparison is particularly problematic for a rural site. The DfT expressly warns that national comparisons can be misleading because rural areas generally have fewer destinations and transport options. Its guidance gives the specific example that a score which appears low nationally may nevertheless demonstrate relatively good connectivity when compared with locations of the same rural classification.

Indeed, the DfT records that average overall connectivity ranges from 22.4 for "Rural hamlets and isolated dwellings" to 77.1 for "Urban major conurbations".

That is highly pertinent because the LPA repeatedly describes Finkle Street Lane as a hamlet.

A raw score of 29 cannot therefore reasonably be converted into a conclusion of "unsustainability" merely because it falls within a low percentile nationally, without first considering the appropriate rural comparator and the site's actual circumstances.

No such analysis appears in either the Planning Policy response or the case officer's email.
The detailed Connectivity Tool results also require a balanced interpretation
The LPA's own extract contains information which is not reflected in the conclusion reached.

In particular, the tool records a cycling score of 48 overall, while for residential connectivity the site scores 65 for cycling and 44 for public transport. The tool also records cycling scores of 54 for workplaces and 45 for shopping.

Those figures should not themselves be treated as determinative either way. The point is that the Tool provides a series of relative indicators which require contextual interpretation. It does not produce a binary sustainable/unsustainable result.

That is exactly why the DfT guidance requires the Tool to be considered alongside local evidence and professional judgement.

The real-world evidence remains relevant and must be considered alongside the Tool.
The application site is not an isolated dwelling in open countryside. The LPA acknowledges that it lies within the hamlet off Finkle Street Lane and is not part of an open rural setting.

There are bus stops approximately 80 metres from the site.

There is an established traffic-free public footpath towards Wortley, which the LPA calculates as approximately 830 metres, as well as a highway route provided with footways.

The fact that those routes are not continuously street-lit is capable of being a consideration, but it does not make them non-existent or unusable. The DfT's own Connectivity Tool guidance confirms, importantly, that the Tool does not measure route quality matters including lighting.

The LPA must therefore assess the actual routes on their merits rather than treating either the absence of lighting or the Connectivity Tool score as determinative.

Similarly, the bus services are undoubtedly less frequent than would be expected in an urban location. That does not mean that no genuine public transport opportunity exists.

Planning Policy now identifies services approximately every other hour to Deepcar and Barnsley, while the case officer identifies the timetable for services 23 and 23a.

The relevant question is not whether a future occupier might sometimes choose to travel by car. In a rural location some car use is entirely foreseeable. The question under GB7(1)(g)(iii) is whether, having particular regard to TR3 and applying it proportionately to the single dwelling actually proposed, the location is sustainable.

Appeal Decisions

We also maintain the relevance of the appeal decisions previously submitted.

We recognise that appeal decisions do not create binding precedent and that each proposal must be considered on its individual merits. However, that does not render comparable Inspector decisions immaterial. Their relevance lies in the approach taken to assessing the sustainability of small-scale residential development in rural or semi-rural locations where public transport is limited and some reliance upon private vehicles is inevitable.

Our earlier response specifically identified a Sheffield appeal involving a dwelling further from the nearest bus stop and with unlit pedestrian routes, where the Inspector nevertheless found the location sufficiently sustainable.

Simply stating that the appeal occurred in another local authority does not engage with the planning reasoning upon which it was submitted.

There is also the site's own planning history. Sustainability was not identified as a reason for refusal when outline residential development was previously considered under application 2017/0845. We acknowledge that the policy context has subsequently changed, but the physical relationship of the site to the hamlet, the surrounding road network and nearby settlements remains materially relevant.

Conclusion

There is substantial common ground between the parties. The LPA accepts that the site is grey belt, that the proposal satisfies GB7(1)(g)(i), and that there is an evidenced unmet need for housing, including a housing land supply of only 2.9 years.

The sole remaining issue is therefore whether this single dwelling is in a sustainable location for the purposes of GB7(1)(g)(iii). The original objection was materially influenced by the incorrect assumption that there was no public transport provision nearby. It is now accepted that bus stops exist approximately 80 metres from the site, alongside pedestrian connections towards Wortley and opportunities for cycling.

The LPA's subsequent reliance on the frequency of those services and a Connectivity Tool score of 29 does not, in our view, justify a finding that the site is unsustainable.

Policy TR3 requires a proportionate assessment having regard to the type, scale and location of development, while the Connectivity Tool is an evidential aid rather than a determinative test of sustainability.

When the actual circumstances are considered in the round, i.e. a single dwelling within an existing hamlet, close to bus stops and with alternative pedestrian and cycling opportunities, some likely reliance on the private car does not establish that the proposal fails GB7(1)(g)(iii).

We therefore maintain that the proposal satisfies GB7(1)(g) and should not be regarded as inappropriate development in the Green Belt, and respectfully request that the proposed reason for refusal is reconsidered.