

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

Respondent details

Comment ID number: PDSP.029.001

What is your Name: mg_lichfields

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

Lichfields

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:

Commercial Estates Group (CEG)

Document

Which document to you wish to make a representation on:

Part 1: Vision, Spatial Strategy, Sub-Area Policies and Site Allocations

Which section of the document is your representation on:

Chapter 3: Growth Plan and Spatial Strategy

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

N/A

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:

This representation has been prepared by Lichfields on behalf of CEG. CEG objects to Policies SP1; SP2 and SA1. The plan is not positively prepared or consistent with national policy and is therefore unsound, and the delivery of 18,640 dwellings in the Central Sub-Area over the plan period is not realistic. For full representation please refer to '50479_02 Oughtibridge site 8C Sheffield Plan rep 17.02.2023 v5.pdf' emailed separately from [REDACTED]

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:

To ensure the effective delivery of the Growth Plan and Spatial Strategy and for the Plan to be sound under Paragraph 35 of the Framework, the following changes need to be implemented:

1. The housing requirement should be based on the Standard Method of 3,018 dwellings per annum (54,324 dwellings over the Plan period) which the NPPF makes clear should be the minimum number of homes needed. Should it be accepted that exceptional circumstances do exist to justify an alternative approach, then the housing need in Policy SP1 should be fully aligned with employment growth which Lichfields considers to be 2,275dpa.
2. The size, type and tenure of housing needed for different groups in the community needs to be reflected in the housing supply and spatial distribution, including affordable housing, families with children and older people.
3. A more realistic number of dwellings in the Central Sub-Area needs to be proposed which does not assume that all of the proposed allocations in the trajectory will come forward if they do not have planning permission, particularly in years 1 to 5 of the Plan period. Applying a lapse rate of 50% for site allocations without planning permission reduces the delivery of housing in the Central SubArea to 13,371 dwellings.
4. On the above basis, the shortfall in housing supply under the Standard Method is 23,881 dwellings; the shortfall under a housing need that fully aligns housing and jobs growth is 8,465 dwellings; and under Policy SP1 it is 5,135 dwellings.
5. It is therefore clear that greenfield Green Belt sites in appropriate locations are required to deliver the overall housing requirement.
6. Land east of Langsett Road North, Oughtibridge (amongst other suitably located sites) is removed from the Green Belt and allocated for housing to address the shortfall identified above and to ensure a more balanced approach to housing delivery across the City, which will ensure that all housing needs are met.

For full representation please refer to '50479_02 Oughtibridge site 8C Sheffield Plan rep 17.02.2023 v5.pdf' emailed separately from [REDACTED]

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:

'In accordance with 'Government Guidance Local Plans: taking part in examinations' we wish to appear before and be heard by the inspector at a hearing because:

- our comments (a 'representation'), are on the final draft of the plan (the 'Regulation 19' pl