

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

Respondent details

Comment ID number: PDSP.093.001

What is your Name: ALG

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

Access Liaison Group

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:

Part 2: Development Management Policies and Implementation

Which section of the document is your representation on:

Policy NC4: Housing for Independent and Supported Living

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:

Not completed by respondent

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:

We fully support the provisions of "Specialist housing designated for older or disabled people" but observe that in these settings it is vital that communal social space is provided indoors as well as outdoors especially where individual rooms do not have room for visitors.

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:

We believe that this policy alongside Annex B are the key areas of concern that the plan is not sound in terms of accessibility needs of the disabled people of the city. The complex interactions to not undermine vision but not neglect the needs of disable

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

Respondent details

Comment ID number: PDSP.093.002

What is your Name: ALG

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

Access Liaison Group

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:

Part 2: Development Management Policies and Implementation

Which section of the document is your representation on:

Policy NC4: Housing for Independent and Supported Living

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

4.17-4.19

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:

We consider that the policy is not effective or completely sound in terms of the needs of Disabled or older people. Principally in the 2% figure for wheelchair adaptable dwellings is where we are not satisfied that this fully meets the aims and needs in 4.17-4.19. In particular we draw attention to wet room readiness is only required in M4(3) and yet this is of benefit to older people as a later adaptation which is not included in M4(2). Further, if this is not built in from day one to apartment buildings it will be more expensive or complicated to achieve, requiring cooperation and consents from landlords etc. We are also concerned at the gradient exemptions statement for wheelchair accessible housing. We have received several comments on the importance of parking including room for using rear loading Wheelchair

Accessible Vehicles. Also we have had indications of no available properties within 50 miles from people trying to downsize at the time of the bedroom tax showing how stark a lack there is of properties and that variety is needed for differing life stages and needs.

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:

There are several complicating factors to what might be the correct outcomes so we would encourage exploration of the following:

- That all apartment and flat complexes are required to either:
 - o Meet M4(3) standard, or,
 - o Meet M4(2) standard and include passive provision for wet room installation through appropriate drainage points.
 - o Note: We believe the costs will be less substantial than reported in this accommodation type and therefore achievable in all instances. Consideration of evacuation practicalities and parking implications.
- That all developments have a minimum of 5% M4(3) requirements. Noting that older people as well as disabled people often benefit from this reduction in risk from level access between stories and by having step free access to showers. If there are any financial viability concerns then consideration should be made to the points made for apartment and flat complexes. Gradient exemptions and to which if any instances this is applied to M4(3) properties. We feel exemptions are problematic and that developers must feel clear that adjustments to site levels are essential for accessible homes.

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:

We believe that this policy alongside Annex B are the key areas of concern that the plan is not sound in terms of accessibility needs of the disabled people of the city. The complex interactions to not undermine vision but not neglect the needs of disable

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

Respondent details

Comment ID number: PDSP.093.003

What is your Name: ALG

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

Access Liaison Group

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:

Part 2: Development Management Policies and Implementation

Which section of the document is your representation on:

Policy NC5: Creating Mixed Communities

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:

Whilst we support the aims of this policy we are concerned that without specific mention of different housing sizes for wheelchair users it will not be effective for disabled people and the inclusivity the plan desires. The policy needs to ensure that the full variety of housing types are put forward in each area of the city to meet the M4(3) requirements. This needs careful consideration to ensure that appropriate coverage of demographics from young to old, disabled people with families, to those without are able to find accommodation near to where they are working or are already settled in the city. Multiple group members have commended on the impression that only larger properties that are unaffordable would be provided and make the policy ineffective for disabled peoples' needs with no accommodation in

sections of the city for their household or family support needs. There are also considerations required for assistance dog users.

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:

Variety in wheelchair adapted accommodation sizes across all areas of the city are key. Wherever possible effectiveness of servicing needs as they change through the decades might be best served by M4(3) properties being transferred to social housing providers if possible. Irrespective of possibilities in this regard this policy needs to make specific reference to the variety factors above for adapted accommodation. Additionally, we note the needs of assistance dog owners where garden space or spending areas are required and so again a variety of property sizes are needed where denser settings might not deliver the necessary spending areas for assistance animals.

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:

Only if you have questions or require clarifications.

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

Respondent details

Comment ID number: PDSP.093.004

What is your Name: ALG

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

Access Liaison Group

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:

Part 2: Development Management Policies and Implementation

Which section of the document is your representation on:

Policy NC6: Purpose-Built Student Accommodation

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:

Please ignore previous submission on NC6 as this was in error. Whilst we support the policy and in particular the demand points as though there are requirements for being able to adapt to other accommodation types we are concerned that this could easily lead to substandard results and potentially a lower provision of M4(3) accommodation than in other areas which does not help with the aims of inclusivity.

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:

Therefore, we suggest that great care is taken to align the wheelchair accessible bed requirement with the increases proposed in our response to NC4 such that at least 5% can or are wheelchair accessible accommodation with associated accessible facilities in line with other policies. We would be amenable to consideration of 2% as the minimum as long as the remaining 3% (making up to 5%) were adaptable at a later date.

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

No, I do not 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:

N/A

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

Respondent details

Comment ID number: PDSP.093.005

What is your Name: ALG

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

Access Liaison Group

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:

Part 2: Development Management Policies and Implementation

Which section of the document is your representation on:

Policy NC8: Housing Space Standards

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:

Whilst we fully support this policy we wish to draw attention towards two aspects that mean the policy is not fully effective for disabled people. Firstly, without the requirement for step free routes and accessible thresholds to amenity space (communal and private) this can increase social isolation and participation. Secondly, in certain developments where there is no private outdoor green space this renders a complex unavailable to assistance dog users which is one of many needs that can arise during the course of life.

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:

Inclusion of clarity that “both private and communal amenity space must be via a level access route and with only accessible thresholds to enable independent access” is vital to making the plan effective for an inclusive city. Secondly, all developments that do not include a per-unit private green space suitable for assistance dogs to spend a penny should be required to identify and design a space for assistance animals to use. This will make inclusivity more effective by maximising the accommodation choices for disabled people at different life stages.

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:

Only if you have questions or clarifications

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

Respondent details

Comment ID number: PDSP.093.006

What is your Name: ALG

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

Access Liaison Group

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:

Part 2: Development Management Policies and Implementation

Which section of the document is your representation on:

Policy NC15: Creating Open Space in Residential Developments

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:

We support this policy, however, where there is no private outdoor green space this results in an ineffective policy for disabled people requiring assistance dogs and therefore make a development inaccessible.

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:

This section (alongside similar notes submitted for NC8) should require all developments to identify and design a space for assistance animals to use for toileting. This would need to be a mandatory requirement and include suitable

facilities to partition off from other communal amenity space. This will ensure that large developments are an inclusive option for all including those needing assistance dogs.

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:

Only if you have questions or clarifications.

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

Respondent details

Comment ID number: PDSP.093.007

What is your Name: ALG

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

Access Liaison Group

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:

Part 2: Development Management Policies and Implementation

Which section of the document is your representation on:

Policy CO2: Parking Provision in New Development

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:

There are two points which are not effective in terms of the needs of disabled people. Firstly, in point 'a' car-free is not compatible for category 3 wheelchair adaptable/accessible properties where there is likely an essential need for accessible parking for a Motability vehicle, or where not a vehicle owner reasonable need for care or support personnel making short or long visits, or friends visiting who are blue-badge holders requiring an accessible space. Further, non-provision will mean demands being placed on on-street parking, or even worse not being able to receive care or use an appropriate mobility vehicle. Secondly, point 'd' we believe this to not be fully effective until it includes clear requirements to ensure that

recumbent cycles and other accessibility specific active travel mobility devices are able to be stored by appropriate secure storage design including access routes.

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:

Noting the above problems with effectiveness we believe that for point 'a' this will be best addressed by comments on Annex B. However, once this is finalised then appropriate mentions of accessibility will be needed in CO2 policy points. Regarding point 'd' emphasis is needed for secure cycle storage to include requirements for trikes, recumbent cycles and other active travel mobility devices which are longer and larger. This will need suitable design of room sizes and fittings and the associated access ways to cover trikes and bikes up to 2m long. This might mean separating active travel storage secure space requirements from general car parking.

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:

We believe that this policy alongside Annex B and NC4 are the key areas of concern that the plan is not sound in terms of accessibility needs of the disabled people of the city. The complex interactions to not undermine vision but not neglect the needs of

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

Respondent details

Comment ID number: PDSP.093.008

What is your Name: ALG

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

Access Liaison Group

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:

Part 2: Development Management Policies and Implementation

Which section of the document is your representation on:

Policy CO3: Broadband and Telecommunications

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:

There are two points which are not effective currently for some disabled and older people. Firstly, the lack of traditional phone lines as a requirement for properties means no guaranteed resilience for emergency calls in a power cut. Secondly, point 'b' should be clear on the need for suitable contrast with footway surfaces and orientated to minimise obstruction.

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:

Whilst we support installation of Full fibre to the premises provision and in particular multiple providers to ensure competition and continuity of service should a supplier fail, we want to see inclusion of traditional landline infrastructure. This is because this is the only network sustaining emergency call capability during extended power cuts which is vital for pendant alarm users who invariably will be elderly or disabled. This was picked up independently by several different contributors and those who provide support as relatives. Additionally, with the potential rolling power cuts risk this year it is clear from grid operators that falling back to mobile or data networks is not sufficient as they are neither on protected power supplies, and nor are there any requirements for significant backup power sources. Secondly, point 'b' should make it clear that equipment on footways must contrast in the short and long term with paving surfaces and should be orientate to not cause an obstruction. Obstruction policy could be referenced if desirable but must be linked to cover both public and private land.

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:

If you require more information on the impacts etc.

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

Respondent details

Comment ID number: PDSP.093.009

What is your Name: ALG

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

Access Liaison Group

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:

Part 2: Development Management Policies and Implementation

Which section of the document is your representation on:

Policy GS11: Sustainable Drainage Systems

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:

Policy effectiveness not complete without indication of ensuring edge detection along foot and road ways.

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:

The GS11 policy must ensure that edges of footways and roadways are tactilly detectible by the blind and partially sighted in a safe manner (likely with a standard kerb edge (with holes or gaps to drain into the SUDS) and that any footway width requirements do not include the 'kerbs' on the SUDS.

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:

Only if you have questions or need clarification on impacts if not done.

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

Respondent details

Comment ID number: PDSP.093.010

What is your Name: ALG

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

Access Liaison Group

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:

Part 2: Development Management Policies and Implementation

Which section of the document is your representation on:

Policy DE2: Design and Alteration of Buildings

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:

There are two points which are not effective in terms of equality of access policy. Firstly, 'q' needs emphasis of disability access to utility areas for refuse and meter reading. Secondly, a new point is needed to ensure that communal and outdoor spaces is always level and lip free access to ensure social inclusion including roof gardens and patios etc.

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:

We support all the points raised, particularly 'b' with reference to main entrance as the level access for disabled people. However, 'q' should be enhanced to ensure refuse and meter reading rooms have level access and that there is enough room to turn in a wheelchair. A new point should be added to ensure that all private and communal amenity space again are level access, and without lips or other edges making independent access impossible. This must cover roof gardens and patios to ensure the policy is effective and ensures social inclusion within communities.

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:

Only if you need a clarification or question.

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

Respondent details

Comment ID number: PDSP.093.011

What is your Name: ALG

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

Access Liaison Group

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:

Part 2: Development Management Policies and Implementation

Which section of the document is your representation on:

Policy DE2: Design and Alteration of Buildings

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:

Repeated as server went unavailable:

There are two points which are not effective in terms of equality of access policy. Firstly, 'q' needs emphasis of disability access to utility areas for refuse and meter reading. Secondly, a new point is needed to ensure that communal and outdoor spaces is always level and lip free access to ensure social inclusion including roof gardens and patios etc.

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:

We support all the points raised, particularly 'b' with reference to main entrance as the level access for disabled people. However, 'q' should be enhanced to ensure refuse and meter reading rooms have level access and that there is enough room to turn in a wheelchair. A new point should be added to ensure that all private and communal amenity space again are level access, and without lips or other edges making independent access impossible. This must cover roof gardens and patios to ensure the policy is effective and ensures social inclusion within communities.

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:

Only if you have a question or need clarification.

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

Respondent details

Comment ID number: PDSP.093.012

What is your Name: ALG

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

Access Liaison Group

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:

Part 2: Development Management Policies and Implementation

Which section of the document is your representation on:

Policy DE4: Design of Streets, Roads and Parking

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:

There are two points which are not effective in terms of equality of access policy. Clarification needed on 'a' as impacts if ramps are not used in designs create a barrier for a route for wheelchair users and others. 'c' shared surfaces between bikes and pedestrians cause problems for many disabled people from the visually impaired to those with limited or no hearing and those with limited head movement – shared surfaces should be prohibited or avoided to maximise participation of all in moving around their neighbourhood.

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:

For 'a' consider at least an oxford comma, or preferably more clarity such as "and steps only when necessary and as a parallel alternate route". For 'c' discouragement or prohibition of shared spaces should be set, and additionally any active travel corridors should ensure that cycle routes allow two trikes or recumbent cycles can pass each other. All other parts we support, particularly 'h' and 'k'.

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:

If required we are happy to assist on this topic.

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

Respondent details

Comment ID number: PDSP.093.013

What is your Name: ALG

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

Access Liaison Group

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:

Part 2: Development Management Policies and Implementation

Which section of the document is your representation on:

Policy DE5: Design of Shop Fronts

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:

DE5 is not effective in access and inclusion as there is no inclusion of level access provision for wheelchair users. This is vital when considering policies of 20-minute neighbourhoods that are available for all as noted in 4.34-4.38. If level access provision is not detailed in relation to shop fronts (and therefore entrances) then the overarching policy will not render the average local or district centre universally available forcing an inequality of having to travel further (cost of time and money) or pay for delivery services.

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:

Include a requirement for level access entry as part of shop fronts (wherever practicable) as a specific requirement. Whilst inclusion of level access at refit as well as new use is only a slight improvement, allowing such a requirement will further equality of opportunity to participate in the 20-minute neighbourhood policy.

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:

Only if there is a question or clarification required.

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

Respondent details

Comment ID number: PDSP.093.014

What is your Name: ALG

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

Access Liaison Group

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:

Part 2: Development Management Policies and Implementation

Which section of the document is your representation on:

Policy DE6: Design of Tall Buildings and Protection of Views in the City Centre

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:

In addition to earlier comments – we observe from experience that any building with only a single lift to provide level access is ineffective in trapping people in or away from their accommodation when it fails. Without this adjustment the plan will be unsound because of the large amount of accommodation that some disabled people will be unable to access.

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:

An additional requirement should be entered to ensure that more than one lift is included in all buildings to ensure the plan is effective in providing reliable access to and from policies which is essential to achieve M4(2) and M4(3) accessibility. This is essential as we do receive case work where lift failures have trapped people on one floor of their building.

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:

Vital inclusion to make the plan sound which might need additional input.

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

Respondent details

Comment ID number: PDSP.093.015

What is your Name: ALG

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

Access Liaison Group

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:

Part 2: Development Management Policies and Implementation

Which section of the document is your representation on:

Policy DE7: Advertisements

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:

DE7 is not sufficiently effective in highlighting the hazard of excessive glare from illuminated and digital advertising displays particularly on or near the highway. Whilst supporting the principles in 'h' regarding not "creating hazards for disabled people" we are concerned that the hazards of glare from over lit digital advertising compared with the prevailing light conditions (especially at night) need to be clearly stated. This is a painful and distracting situation for some visually impaired people, and distracts motorists from being able to spot, react and avoid vulnerable pedestrians near crossings. Further, 'j' does not fully cover the former concerns where again excessive illumination to the prevailing lighting conditions still causes particular

difficulty for disabled people passing, therefore, suitable standards or a prohibition are required.

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:

Updates could include reference to 'glare' or similar and requirements for interior, LED or digital signage to include light sensitivity circuitry (that must be functional) or be turned off particularly after dark and when the business is not open. Similarly, illuminated or digital advertising on street requires the same rules.

The above will make the plan sound and effective by considering disabled peoples' needs clearly in this development policy.

Note, with proposals in the city to further dim street lights this becomes even more important issue to manage and resolve.

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:

Only if there are questions or clarifications on this item (DE7)

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

Respondent details

Comment ID number: PDSP.093.016

What is your Name: ALG

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

Access Liaison Group

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 B: Parking Guidelines

Which section of the document is your representation on:

N/A

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:

There are several aspects of this policy which we believe are currently neither fully sound or effective currently for disabled and older people. Principally this covers the specification of car-free development in some parts of the city, some tightening of policy regarding allocated/unallocated provision, parking for accessible equivalents to cycles throughout the city, and less than 100% EV charge point infrastructure. Firstly, car-free is not compatible for category 3 wheelchair adaptable/accessible properties where there is likely an essential need for accessible parking for a Motability vehicle, or where not a vehicle owner reasonable need for care or support personnel making short or long visits, or friends visiting who are blue-badge holders requiring an accessible space. Non-provision will mean demands being placed on

on-street parking, or even worse not being able to receive care or use an appropriate mobility vehicle the negative impacts are too high. Further, as the spatial strategy goes against prior input we remain unconvinced that the densest development in the city centre will supply sufficient accessible parking provision and therefore on-site provision is essential.

There are also considerations to be made in terms of M4(2) dwellings where unallocated bays can result in those who need bays are not able use the ones which are most appropriate. Further, without visitor spaces where the need for medical/care provision may be short or long stay and the lack of provision can have significant impacts on disabled and older people in being able to realistically use properties in the denser urban areas. The plan needs to set conditions on management companies to ensure that accessibility and medical/care provider visitors take absolute priority for issuing of permits and allocation of spaces to the most appropriate bays on site for differing accessibility needs. This needs to be expected in all developments as rarely do properties meet the assumption made for example the block in which one member resides in the city centre actually houses many older people, many families with primary age children, young professional wheelchair users, not just the assumed typical post-grad students and young professionals taking starter homes in an apartment block. The vast development plans for the central core make this mixed demographic further likely to increase.

Regarding Cycle Parking, as there is no requirement in place for accessible active mobility equivalents for cycles we feel the plan is not currently sound because this does not necessarily ensure secure storage for what are often more expensive or bespoke mobility aids that are significantly longer and wider than ordinary cycles. Without the requirement to design in the space and suitable access routes this will fundamentally exclude the disabled people who have the capability to do active travel from being able to do so which has negative health and participation in society impacts.

Finally, we are concerned that in the Accessible Parking section with respect to EVCP provision we feel 50% at fit out is neither sound nor effective. The Motability scheme is a lease scheme and normally the provider of Wheelchair accessible vehicles irrespective of who drives. Due to the vehicles being leased they are highly likely to change to EV earlier than other motorists (usual turnover 3 years). This means that for the majority of the plan period accessible bay users are likely to be using the EVCP, and further, the implications of running out of charge will strand many users because of the custom nature of many vehicles. Therefore, ensuring that all accessible parking is appropriately fitted from day one and that power grid capacity has been appropriately allocated to ensure all critical users are accounted for is essential.

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 address the various problems raised regarding effectiveness we believe the following is required:

That M4(3) properties are always allocated a minimum of one Accessible parking space on site and that this takes precedence over car-free development status.

That the stipulation of unallocated spaces is not necessarily appropriate and needs robust clarification to ensure that any surplus accessible spaces are available to residents who need additional space but whom are not necessarily wheelchair users. We believe therefore the most likely approach to succeed is one where spaces are allocated but not on property deeds for M4(2) properties. Instead property management are responsible for ensuring allocation periodically and any reallocation of parking for accessibility needs as needed such that it happens in a timely manner (starting at the point of setting a completion date or signing a tenancy agreement). The conditions must also require effective enforcement arrangements by the management company to ensure compliance (typical in leases anyway but needs to be clear to make the policy effective).

That C3/C4 1-2 bed dwellings (communal parking) in the Central Area MUST have 1 accessible space per 8 non M4(3) units or per floor whichever is greater, to then allow allocation to residents in need for accessibility reasons (usually holding a blue badge) and the remainder of spaces be for blue badge holding visitors and for medical or care visitors.

For C3/C4 3-4 bed properties a minimum of 2 off-street spaces with space set for one accessible space (resident or visitor) and a standard space (Assumed these are allocated/not communal).

We believe this will be more practicable if each 1-2 bed accommodation unit has a single space for equity, and with only visitor bays for blue-badge (accessible) and medical/care (standard) provision above this.

For C2 student accommodation accessible beds (including adaptable ones to meet need), again accessible parking spaces should be provided on site. This should then take account of potential mobility needs with blue-badge entitlement where no wheelchair access is required.

We are conscious that in particular the above is quite complicated and further collaboration might aid all, in particular when considering interaction with our points raised for policy NC4 so as to balance the vision and aims whilst ensuring functional development and parking policies that will work for disabled people and their needs.

For Cycle Parking, we emphasise the need for secure cycle storage to include requirements for trikes, recumbent cycles and other active travel mobility devices which are longer and larger. This will need suitable design of room sizes and fittings and the associated access ways to cover trikes and bikes up to 2m long.

Consideration might likewise be needed as to whether such storage is appropriate for traditional mobility scooters and therefore charging infrastructure being required.

Finally, EVCP, we feel that all (100%) accessible parking bays must be fitted with working charging points from day one due to the noted swifter switch that is likely due to the Motability scheme lease model and the noted greater negative impacts on custom vehicle users.

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:

We believe that this policy alongside NC4 are the key areas of concern that the plan is not sound in terms of accessibility needs of the disabled people of the city. The complex interactions to not undermine vision but not neglect the needs of disabled pe