

From: [REDACTED]
To: [REDACTED]
Subject: RE: Publication (Pre-submission) Draft Sheffield Plan 2022
Date: 20 February 2023 14:20:52
Attachments: [image001.jpg](#)
[RMBC Comment on Sheffield Local Plan.pdf](#)

Dear Sir / Madam,

Please find the attached letter as the formal response on behalf of Rotherham Metropolitan Borough Council to the consultation on the Publication (Pre-submission) Draft Sheffield Plan 2022.

Regards,

Winsze Lam

Planning Policy Officer

Planning, Regeneration and Transport | Regeneration & Environment

Rotherham Metropolitan Borough Council

[REDACTED]
[REDACTED]

*Please note Thursday is my non-working day.



RTPI Planning Excellence Award Winner 2018: Local Authority Planning Team of the Year

From: SheffieldPlan <sheffieldplan@sheffield.gov.uk>
Sent: 09 January 2023 10:57
Subject: Publication (Pre-submission) Draft Sheffield Plan 2022

You don't often get email from sheffieldplan@sheffield.gov.uk. [Learn why this is important](#)

Dear Statutory Consultee/Statutory Consultee's Agent

Publication (Pre-submission) Draft Sheffield Plan 2022

Consultation pursuant to Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

We are preparing a new local plan, which, when adopted, is expected to be called "the Sheffield Plan". Following public consultation on 'Issues and Options' in 2020, the Publication (Pre-submission) Draft Sheffield Plan is now ready for consultation.

The Publication Draft Plan represents the Council's formal proposals on how the city should grow and develop over the period to 2039. It covers the whole of Sheffield except for the part of the city that is in the Peak District National Park.

We are asking for comments and feedback on whether the Plan has been prepared in accordance with legal and procedural requirements, and whether it is sound. Plans are sound if they are:

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground;

and

- d. **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework and other statements of national planning policy, where relevant.

The statutory public consultation is available for a 6-week period from Monday 9 January to Monday 20 February 2023. A full **Statement of the Representations Procedure** is attached to this email.

You can read the **Publication Draft Sheffield Plan on the [Consultation Portal](#) on the Council's website.** You can also view the other supporting documents that we will be seeking comments on, together with other background documents that you may find helpful to refer to.

To make your comments visit the Consultation Portal from 9 January. Please make your comments no later than 11.59 pm on Monday 20 February.

Details of all the consultation events are also available on the Consultation Portal (which can also be accessed from the Council's website).

Why we are writing to you

We are writing to you as you as a statutory consultee or because you have previously expressed an interest in being kept informed about the new local plan. Consequently, you are on our mailing list of contacts for this group and will have signed up to our 'terms and conditions'.

The data you give us

Under the General Data Protection Regulation 2016 (GDPR) and Data Protection Act 2018 (DPA) Sheffield City Council is a Data Controller for the information it holds about you. The lawful basis under which the Council uses personal data for this purpose is consent.

All representations are required to be made public and will be published on the Council's website following this consultation. Your representations and name/name of your organisation will be published, but other personal information will remain confidential. Your data and comments will be shared with other relevant agencies involved in the preparation of the local plan, including the Planning Inspectorate. Anonymous responses will not be considered. Your personal data will be held and processed in accordance with the Council's Privacy Notice which can be viewed at: <https://www.sheffield.gov.uk/utilities/footer-links/privacy-notice>

How to contact us

If you would have difficulty accessing any of the consultation documents via our website or accessing the Consultation Portal, or you need any further advice or information, please contact us at sheffieldplan@sheffield.gov.uk. You can call us on 0114 2735274. Please also email us at the above address if you no longer want us to contact you about the Sheffield Plan.

Yours faithfully



Simon Vincent
Strategic Planning Service Manager
Planning Service
Sheffield City Council

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Regeneration and Environment Service

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Our Ref
SCC/LP/2023

Direct Line
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Extension

Please contact
Winsze Lam

20 February 2023

Sent via email: sheffieldplan@sheffield.gov.uk

Dear Sir / Madam,

Rotherham MBC response to consultation on The Sheffield Plan: Publication (Pre-submission) Draft

Thank you for the opportunity to comment on the above consultation.

Rotherham Council has considered the consultation documents provided and our comments are set out below.

Housing

It is acknowledged that the Sheffield Plan makes clear its position on resisting the release of any Green Belt land for development.

The Council notes that the publication draft Sheffield Plan proposes setting a housing requirement of 2,040 net additional homes per year and that this housing requirement can be met without the need to remove greenfield land from the Sheffield Green Belt.

Sheffield City Council recognises that the proposed housing requirement figure is significantly below the housing need figure calculated using the Government's standard methodology. The Government's figure for Sheffield is currently 3,018 homes per year, including the 35% uplift applied to Sheffield and the 19 other largest urban centres in England.

In effect, the Sheffield Plan is only proposing to meet around two thirds of the housing need as calculated by the Government's standard methodology. This does seem to present significant risk to achieving a sound plan. It will be for Sheffield City Council to demonstrate to the Inspector that this approach to housing land supply and Green Belt is robust and conforms to national planning policy and guidance.

Bearing in mind that Sheffield already has a significant amount of high-density housing in and around the city centre, a strong evidence base would be required to establish whether there is a long-term housing demand for high density housing at the minimum density of 70dph within the Central Areas and 50-80dph within District Centres (Policy NC9). Unfortunately, the Strategic Housing Market Assessment (SHMA) does not identify the type of housing mix needed in both Rotherham and Sheffield.

While it is appreciated that the target for homes delivered on previously developed land is 85% across the period of 2022 – 2039 (Policy H1b), the Council notes that there are a number of allocated residential sites in urban areas are currently in active uses, some would also involve a step change from a mix of uses and require substantial resources to achieve the locally derived target to meet housing needs in the City. It is also noted that the proposed spatial strategy will not meet aspirational family housing needs.

With the flexibility of the Sheffield Plan's 'Policy Zones' approach, the Council has concerns over the deliverability of the housing strategy, particularly the smaller sites within urban areas.

Local services provision

The Sheffield Plan's objectives for a vibrant city centre and for a green city, are supported.

The principle of Policies NC11, NC15 and DC1 are to ensure key local services (open space, education and health facilities), is in line with the Sheffield Plan objectives for a fair, inclusive and healthy city.

The Council understands the Sheffield Plan focus on high density housing development within urban areas, however we are not aware of any specific site allocations for primary / secondary schools or local medical provision (other than hospitals). It is noted that the Local Plan anticipates these needs arising in specific spatial areas such as the Central Area and Attercliffe. The Council would also raise concerns on the very limited open space allocation (only 3 sites in the Central Area) and the quality of some of the Urban Green Space zones that include infrastructure verges (along tramline, trainline or roads) and the Parkway roundabout. Such linear green infrastructure routes and spaces are not publicly accessible, and their value in meeting other green infrastructure purposes, such as biodiversity and urban cooling, is not quantified but is presumed.

Logistics

It is noted that Sheffield City Council support the proposed Apleyhead logistics site in the submitted Bassetlaw Local Plan in meeting the needs within the wider sub-region. This site is not supported by Rotherham Council. The Council does not consider that the significant impacts of these logistics proposals on the communities of Rotherham Borough have been appropriately considered and mitigated for. In the Council's responses to the Inspectors examining the Bassetlaw Local Plan, we have noted the traffic impacts arising from these proposals on emissions, congestion and community

severance at Anston on the A57. Transport modelling work undertaken by Bassetlaw Council has not considered the impact of increased HGVs and cars along the length of the A57 and that length of road within Rotherham Borough.

Other matters

The implementation of Policy DE6 of the Sheffield Plan, does not identify the locations of the 'Landmark Buildings' and 'Tall Building Areas'; these are proposed to be identified in a separate SPD.

The Council has made some minor suggestions to the Part 1 of the Sheffield Plan and these are listed in the appendix for information. It is also suggested that a review of the readability of the maps in terms of the colour and the level of information being shown in each map is further considered, as it is considered that the clarity of the maps could be further enhanced.

Duty to Co-operate

Rotherham Council will continue to engage positively in meeting the Duty to Co-operate requirements placed on local authorities. The Council has provided a separate written response to Sheffield City Council's latest Duty to Co-operate letter.

I hope that these comments are helpful.

Yours sincerely



Andy Duncan

Planning Policy Manager

Planning, Regeneration & Transportation Service

Appendix – Minor suggestions for the Sheffield Plan (Part I)

<i>Page / Para.</i>	<i>Note</i>
p.6 – para.1.27	'Waste' should be in bold to match with 'Management'
p.10 – Map 2	Sheffield boundary overlap with SYMCA, not clearly identified
p.16 – bullet 5	'To' create a city...
p.21 – para.3.5 bullet 4	Delete extra spacing between 'Local Centre'
p.33 – para.4.8	Footnote 20 should be with 'City Centre Strategic Vision'
p.36 – Map 6	Too much information and unclear the identify city centre boundary within the central sub-area.
p.67 – Map 8 p.71 – Map 9	The AMID boundary is unclear as part of it outside the sub-areas are faded.
p.100 – Map 15 p.101 – Map 16	Colour of the lines are too similar and difficult to read
p.104 – Map 17	The use of pattern legends with similar colours are difficult to read
p.105/106 – Policy D1	Two set of alphabet bullet points within the policy can be confusing
p.108 – Policy N1 bullet 1	'Transport' should be in bold