

From: [REDACTED]
To: [REDACTED]
Subject: Sheffield Local Plan - Regulation 19 representations
Date: 20 February 2023 13:36:04
Attachments: [SCC Reg 19 Consultation Form - Parts A and B.docx](#)
[SCC Reg 19 Consultation Form - Parts A and B - 2.docx](#)
[SCC Reg 19 Consultation Form - Parts A and B - 3.docx](#)
[SCC Reg 19 Consultation Form - Parts A and B - 4.docx](#)
[SCC Reg 19 Consultation Form - Parts A and B - 5.docx](#)
Importance: High

Hi Simon

Please find attached the representations on behalf of Bassetlaw District Council in response to the Regulation 19 Sheffield Local Plan.

Thanks

Karen

Karen Johnson, MRTPI
Planning Policy Manager
Bassetlaw District Council
Queens Buildings
Potter Street
Worksop S80 2AH
[REDACTED]

 Karen Johnson
Planning Policy Manager
Bassetlaw District Council, Potter Street, Worksop, Nottinghamshire, S80 2AH
W: www.bassetlaw.gov.uk

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Sheffield Plan Consultation Representation Form January – February 2023

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Please tick/ delete as appropriate:

Please confirm you have read and understood the terms and conditions relating to GDPR.

Yes x

No

Please tick as appropriate to confirm your consent for Sheffield City Council to publish and share your name/ organisation and comments regarding the Sheffield Plan.

I confirm my consent for Sheffield City Council to share my name/ organisation and comments regarding the Sheffield Plan including with the Planning Inspectorate.

Yes x

No

Please tick as appropriate below if you wish to 'opt in' and receive updates and information about the Sheffield Plan.

I would like to opt in to receive information about the Sheffield Plan.

Yes x

No

Printed Name: Karen Johnson
Signature: Karen Johnson
Date: 20 February 2023



This form has two parts:

Part A - Personal details – need only to complete once.

Part B - Your representation(s) - Please fill in a separate sheet for each representation you wish to make.

Part A- Personal Details

1. Personal Details

Name: Karen Johnson
Organisation (if applicable): Bassetlaw District Council
Address: Queen's Building, Potter Street, Worksop
Postcode: S80 2AH
Tel: 
Fax:
Email: 

2. Agent Details (if applicable)

Agent:
Organisation (if applicable):
Address:
Postcode:
Tel:
Fax:
Email:

Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: Bassetlaw District Council

3. To which part of the Sheffield Plan does your representation relate?

Policy Number:

Paragraph Number: Paragraphs 1.44-1.48

Policies Map:

4. Do you consider the Sheffield Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

- | | | |
|-------------------------------------------|-----|----------------------------|
| 4.(1) Legally Compliant | Yes | <input type="checkbox"/> |
| | No | <input type="checkbox"/> |
| 4.(2) Sound | Yes | <input type="checkbox"/> |
| | No | <input type="checkbox"/> |
| 4.(3) Complies with the Duty to Cooperate | Yes | <input type="checkbox"/> |
| | No | x <input type="checkbox"/> |

5. Please give details of why you consider the Sheffield Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Sheffield Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Paragraph 1.47 states that the South Yorkshire Mayoral Combined Authority (MYCA) partner authorities have agreed to work together on a number of cross boundary issues and to produce statements of common ground covering these issues. Bassetlaw District Council has produced a SOCG to cover issues relevant to the emerging Bassetlaw Local Plan. However, we have yet to receive SOCG/draft from Sheffield Council relevant to the cross boundary issues in the Sheffield Plan. This is particularly pertinent given that the approach taken to the employment strategy including the evidence base for the Sheffield Plan appears to have been influenced by that within the Bassetlaw Local Plan, yet we have not been involved in stakeholder engagement for this policy matter. We would caution against placing emphasis on the South Yorkshire SOCG, which the authorities have agreed to revisit to ensure it remains an update position for all partners.

Continue on a separate sheet if necessary

6. Please set out the modification(s) you consider necessary to make the Sheffield Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in Question 5 above.

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7. 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)

Yes

No, I do not wish to participate in hearing session(s)

No x

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Yes x

No

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Yes x

No

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I would like to opt in to receive information about the Sheffield Plan.

Yes x

No

Printed Name: Karen Johnson
Signature: Karen Johnson
Date: 20 February 2023



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Email: 

2. Agent Details (if applicable)

Agent:
Organisation (if applicable):
Address:
Postcode:
Tel:
Fax:
Email:

Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: Bassetlaw District Council

3. To which part of the Sheffield Plan does your representation relate?

Policy Number:

Paragraph Number: Paragraph 1.46 on page 11

Policies Map:

4. Do you consider the Sheffield Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) **Legally Compliant** Yes

No

4.(2) **Sound** Yes

No

4.(3) **Complies with the Duty to Cooperate** Yes

No

5. Please give details of why you consider the Sheffield Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Sheffield Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

National policy requires Local Plans to plan for a minimum of 15 years from the date of adoption. The Plan states that adoption is expected in December 2024. Whilst this would a 15 year Plan period we advise that any delays would mean that the Plan period would be less than the minimum required by national policy. It is recommended that the Plan period is extended to 2040 to minimise this risk.

Continue on a separate sheet if necessary

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Yes, I wish to participate in hearing session(s)

Yes

No, I do not wish to participate in hearing session(s)

No x

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Yes x

No

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Yes x

No

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I would like to opt in to receive information about the Sheffield Plan.

Yes x

No

Printed Name: Karen Johnson
Signature: Karen Johnson
Date: 20 February 2023



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Address: Queen's Building, Potter Street, Worksop
Postcode: S80 2AH
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Email: 

2. Agent Details (if applicable)

Agent:
Organisation (if applicable):
Address:
Postcode:
Tel:
Fax:
Email:

Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: Bassetlaw District Council

3. To which part of the Sheffield Plan does your representation relate?

Policy Number:

Paragraph Number: Vision and Objectives

Policies Map:

4. Do you consider the Sheffield Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) **Legally Compliant** Yes

No

4.(2) **Sound** Yes

No

4.(3) **Complies with the Duty to Cooperate** Yes

No

5. Please give details of why you consider the Sheffield Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Sheffield Plan or its compliance with the duty to co-operate, please also use this box to set out your

The vision and objectives do not reflect the approach taken by Policy SP1 or the wider Local Plan that clearly state that the overall strategy for Sheffield is to prioritise development and regeneration of the Central Sub-Area, particularly for housing on brownfield sites. It is recommended that the emphasis of the vision and objectives is re-visited to better align with the approach taken by the wider Plan.

comments.

Continue on a separate sheet if necessary

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Yes

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No x

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Yes x

No

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I confirm my consent for Sheffield City Council to share my name/ organisation and comments regarding the Sheffield Plan including with the Planning Inspectorate.

Yes x

No

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I would like to opt in to receive information about the Sheffield Plan.

Yes x

No

Printed Name: Karen Johnson
Signature: Karen Johnson
Date: 20 February 2023



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2. Agent Details (if applicable)

Agent:
Organisation (if applicable):
Address:
Postcode:
Tel:
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Email:

Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: Bassetlaw District Council

3. To which part of the Sheffield Plan does your representation relate?

Policy Number:

Paragraph Number: Policy SP1

Policies Map:

4. Do you consider the Sheffield Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

- | | | |
|--------------------------------------------------|-----|--------------------------|
| 4.(1) Legally Compliant | Yes | <input type="checkbox"/> |
| | No | <input type="checkbox"/> |
| 4.(2) Sound | Yes | <input type="checkbox"/> |
| | No | <input type="checkbox"/> |
| 4.(3) Complies with the Duty to Cooperate | Yes | <input type="checkbox"/> |
| | No | <input type="checkbox"/> |

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We do not consider that the Sheffield Plan justifies the approach taken to employment development, specifically logistics. It is silent on the need for large scale logistics despite the Council's own evidence base recommending that 62.6 ha should be allocated to meet long term large scale logistics needs.

We agree with the view of Sheffield's economic consultants at paragraphs 4.57-4.58 of the Sheffield Logistics Study which identifies 'a reluctance [by Sheffield Council] to promote logistics as an investment of choice against industrial development and particularly advanced manufacturing'. By doing so, this contrasts with economic objective 2 of the Sheffield Plan which seeks to 'ensure there is a sufficient range of locations, land and premises available for new businesses and those relocating from within the city and elsewhere'.

It is noted that the Sheffield Logistics Study highlights the contribution Bassetlaw's large scale logistics supply makes to wider than local logistics needs. The emerging Bassetlaw Local Plan is promoting only one strategic employment site capable of meeting sub-regional/regional logistics needs. The other sites that appear to contribute to the Bassetlaw's total (Table 5.4 of the Sheffield Logistics Study) are identified in the Bassetlaw Local Plan as meeting the district's general employment needs. As such, we would advise that only the strategic employment site should contribute to a wider than local need.

Sheffield Council is a signatory to the A1 Corridor Property Market Area SOCG. The evidence for the SOCG is the Bassetlaw A1 Logistics Study, referred to as evidence in the Sheffield Logistics Study. The A1 Logistics Study identified a property market area more extensive than that identified by the Sheffield Logistics Study. The A1 Logistics Study recognises that there is 'general consistency' from agents that the A1 corridor (and sister M1 corridor) centred around Bassetlaw stretches from Doncaster to Nottingham. The District Council therefore considers the focus of the Sheffield Logistics Study, centred around the South Yorkshire MYCA to be too narrow in focus and unjustified particularly for large scale logistics.

The Bassetlaw A1 Study states that the large scale logistics supply for that property market area, which includes Sheffield, is estimated to support 9 to 13 years of future need (based on either take up or deliveries).

Within a 15 year plan period this shows that the wider than local need is not fully met, so it is reasonable for the Sheffield Plan to make a reasonable and fair contribution to meeting a wider than local need.

It is also worth noting that the Bassetlaw Plan is still within the Examination period. The Inspectors have yet to report on the approach to be taken to employment provision, including the mix of uses at the strategic employment site. Any reduction in B8 use would lead to a change in the supply and therefore the position proposed by the Sheffield Plan.

comments.

Continue on a separate sheet if necessary

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Yes, I wish to participate in hearing session(s)

Yes

No, I do not wish to participate in hearing session(s)

No x

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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>

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Please tick/ delete as appropriate:

Please confirm you have read and understood the terms and conditions relating to GDPR.

Yes x

No

Please tick as appropriate to confirm your consent for Sheffield City Council to publish and share your name/ organisation and comments regarding the Sheffield Plan.

I confirm my consent for Sheffield City Council to share my name/ organisation and comments regarding the Sheffield Plan including with the Planning Inspectorate.

Yes x

No

Please tick as appropriate below if you wish to 'opt in' and receive updates and information about the Sheffield Plan.

I would like to opt in to receive information about the Sheffield Plan.

Yes x

No

Printed Name: Karen Johnson
Signature: Karen Johnson
Date: 20 February 2023



This form has two parts:

Part A - Personal details – need only to complete once.

Part B - Your representation(s) - Please fill in a separate sheet for each representation you wish to make.

Part A- Personal Details

1. Personal Details

Name: Karen Johnson
Organisation (if applicable): Bassetlaw District Council
Address: Queen's Building, Potter Street, Worksop
Postcode: S80 2AH
Tel: 
Fax:
Email: 

2. Agent Details (if applicable)

Agent:
Organisation (if applicable):
Address:
Postcode:
Tel:
Fax:
Email:

Part B - Your representation

Please use a separate sheet for each representation and return along with a single completed Part A.

Name or Organisation: Bassetlaw District Council

3. To which part of the Sheffield Plan does your representation relate?

Policy Number:

Paragraph Number: Policy T1

Policies Map:

4. Do you consider the Sheffield Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) **Legally Compliant** Yes

No

4.(2) **Sound** Yes

No

4.(3) **Complies with the Duty to Cooperate** Yes

No

5. Please give details of why you consider the Sheffield Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Sheffield Plan or its compliance with the duty to co-operate, please also use this box to set out your

It is unclear how the impact of the proposed Local Plan growth has been assessed on the road network both within Sheffield and beyond its boundaries. This is particularly important for the strategic road network, such as the M1 which provides crucial links within the South Yorkshire MYCA, including with the A57 which is recognised as a vital strategic east-west route between the M1 and A1 in Bassetlaw. Sheffield's Transport Strategy covers the period 2019-2035. However the Plan period covers the period to 2039. It is unclear whether the transport impacts for the last four years of the Plan period have been appropriately considered and addressed. We would welcome further discussion around the potential transport impacts of the level of growth identified within Sheffield Plan, and how the potential transport impacts on the road network particularly outside Sheffield's boundaries can be considered, and if necessary mitigated.

comments.

Continue on a separate sheet if necessary

6. Please set out the modification(s) you consider necessary to make the Sheffield Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in Question 5 above.

(Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Sheffield Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Continue on a separate sheet if necessary

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.

7. 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)

Yes

No, I do not wish to participate in hearing session(s)

No x

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note that the inspector will make the final decision as to who is necessary to participate in hearing sessions, and to which hearing session(s) they should attend, and they will determine the most appropriate procedure to adopt to hear those who wish to participate at the examination hearings.