

From: [REDACTED]
To: [REDACTED]
Cc:
Subject: 2023 02 20 DCC Response - Sheffield LP PreSub Draft
Date: 20 February 2023 16:23:40
Attachments: [2023 02 20 DCC Response Sheffield PreSub Draft LP.pdf](#)

Dear Sir/ Madam

Publication (Pre-submission) Draft Sheffield Plan 2022
Consultation pursuant to Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

Further to your consultation email dated 9 January 2023 (below) please find attached response.

Yours faithfully

Policy and Monitoring | Place | Derbyshire County Council | Direct dial: [REDACTED]
Visit us at www.derbyshire.gov.uk | Follow us on [Twitter](#) | Find us on [Facebook](#)

The Planning Service Privacy Notice can be found [here](#):

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](#)

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe

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

This Email, and any attachments, may contain non-public information and is intended solely for the individual(s) to whom it is addressed. It may contain sensitive or protectively marked material and should be handled accordingly. If this Email has been misdirected, please notify the author immediately. If you are not the intended recipient you must not disclose, distribute, copy, print or rely on any of the information contained in it or attached, and all copies must be deleted immediately. Whilst we take reasonable steps to try to identify any software viruses, any attachments to this Email may nevertheless contain viruses which our anti-virus software has failed to identify. You should therefore carry out your own anti-virus checks before opening any documents. Sheffield City Council will not accept any liability for damage caused by computer viruses emanating from any attachment or other document supplied with this e-mail

Join thousands of local residents who receive regular county council news direct to their inbox. Go to our [website](#) and click on the Sign Up button.

Think before you print! Save energy and paper. Do you really need to print this email?

Derbyshire County Council works to improve the lives of local people by delivering high quality services. You can find out more about us by visiting www.derbyshire.gov.uk.

If you want to work for us go to our job pages on www.derbyshire.gov.uk/jobs. You can register for e-mail alerts, download job packs and apply on-line.

Please Note

This email is confidential, may be legally privileged and may contain personal views that are not the views of Derbyshire County Council. It is intended solely for the addressee. If this email was sent to you in error please notify us by replying to the email. Once you have done this please delete the email and do not disclose, copy, distribute, or rely on it.

Under the Data Protection Act 2018 and the Freedom of Information Act 2000 the contents of this email may be disclosed.

Any personal information you have given us will be processed in accordance with our privacy notices, available at www.derbyshire.gov.uk/privacynotices.

Derbyshire County Council reserves the right to monitor both sent and received emails.

CONTROLLED



Chris Henning
Director Place
County Hall
Matlock
Derbyshire
DE4 3AG

Mr. Simon Vincent
Strategic Planning Manager
Sheffield City Council
Via Email

Telephone: [REDACTED]
Email: planning.policy@derbyshire.gov.uk
Our ref: PM/Pre-Sub Draft Sheffield Plan
Your ref: Sheffield Plan Consultation
Date: 20 February 2023

Dear Mr. Vincent,

Consultation: Publication (Pre-submission) Draft Sheffield Plan 2022

Thank you for your email dated 9 January 2023 consulting Derbyshire County Council on the above document. A consultation of the above document was undertaken internally at Derbyshire County Council.

Please see comments below from individual officers of the County Council. Their names and contact details have been included in case you would wish to discuss/clarify the comments made.

Housing

The Plan sets out the proposed housing requirement for the City over the Plan period of 35,530 homes up to 2039. However, under Government policy in the National Planning Policy Framework (NPPF), local authorities should apply the Standard Methodology for Calculating Housing Need to determine their housing requirements with a 35% uplift included for the 20 largest cities and urban areas, which includes Sheffield. Under the Standard Methodology, Sheffield City's housing need over the plan period would actually be 51,300 homes so the City Council is planning for a housing requirement some 15,770 less than the Standard Methodology would require.

Concern is expressed that this is not clearly identified anywhere in the Plan (one has to look at the supporting background papers to find this). As this housing requirement is such a fundamental shift and difference from the Standard Methodology housing requirement, it is considered that this should be clearly highlighted in the main document in the growth and or housing chapters.

However, the City Council justifies the proposed housing target on the basis that the figure of 35,530 is the total amount of land that can be identified in the City for housing without substantial release of Green Belt land for new housing. The City Council is clear that it is not willing to release land within the Green Belt for housing except brownfield sites within the Green Belt. Sheffield City shares a common Green Belt with North Derbyshire formed by the South Yorkshire and North Derbyshire Green Belt. In

particular, the North Derbyshire Green Belt is strategically very important in preventing the coalescence of the settlements in North East Derbyshire District of Dronfield, Eckington and Killamarsh with each other and the urban area of Sheffield City to the north. Green Belt Review and proposed release of Green Belt to provide for additional housing development around the three North Derbyshire settlements was a key issue in the recent North East Derbyshire Local Plan Examination, given the sensitivity of the Green Belt in this location, which is a very narrow area of Green Belt that separates the three settlements from the Sheffield urban area.

Derbyshire County Council's Officers are represented on the Sheffield City Region Heads of Planning Group and is aware through its work on that group that the City Council has approached the other local authorities in South Yorkshire and North Derbyshire that adjoin it under the Duty to Cooperate to request whether they are able to accommodate any of the City's housing shortfall. However, all the local authorities, including North East Derbyshire District Council, have said they that cannot accommodate any of the City's unmet need as, in the case of North East Derbyshire District Council, it would require release of Green Belt land in their own areas to meet such a need.

On the basis of the comments Derbyshire County Council submitted on the previous consultation on the Issues and Options Local Plan and the concerns that Derbyshire County Council raised about the possible impact of sizeable new housing development in the Green Belt to the south of the City on the openness of the Green Belt in North East Derbyshire, the County Council is supportive of the City Council's approach to plan for a housing requirement that does not require significant release of Green Belt land, particularly Green Belt to the south, south-east and south-west of the City close to the settlements of Dronfield, Eckington and Killamarsh in North East Derbyshire District. The Plan's aim to meet the housing needs of the City by allocating most new housing development within the existing urban areas, with some limited additional development in the Larger Villages in the Northwest Sheffield Sub-Area, is supported.

With regard to the Local Plan's housing allocations that are located to the south-east, south-west and south of the City, none are located on Green Belt land except for the Norton Aerodrome allocation, which is on brownfield land within the Green Belt. On the whole, the allocations that are in closest proximity to North East Derbyshire are relatively modest except for the allocations at Norton Aerodrome (270 dwellings), Birley Avenue, Birley (218 dwellings) and Moor Valley Road, Owlthorpe (151 dwellings). However, the total number of dwellings proposed close to the North East Derbyshire District boundary is significant and totals 1,100 dwellings. This raises issues of cross boundary traffic impacts on the Derbyshire road network and the need for collaborative working between Derbyshire County Council and Sheffield City Council to properly consider the impacts on the County's road network, particularly on the communities in Dronfield, Eckington and Killamarsh and particularly traffic movements on the A61 into and out of the City. Mitigating traffic congestion along the route of the A61 is an important priority for Derbyshire County Council, which will also require a joined up and coordinated approach between the County and City Councils.

(Steve Buffery, Team Leader – Policy and Monitoring, Planning Services. [REDACTED])

Transport

The vision special strategy contains a number of policy and site suggested allocations, although at this stage, relatively little is known about their wider impacts particularly up on the transportation networks in Derbyshire. The A61 is a key transport corridor that links Sheffield centre and its suburbs to the south with Dronfield and Chesterfield in Derbyshire. The A61 is a key growth corridor in northern Derbyshire adjacent to which significant amounts of new housing and employment development are planned. Mitigating traffic congestion along the route of the A61 is an important priority for Derbyshire County Council, which will also require a joined up and coordinated approach between the County and City Councils.

Derbyshire County Council endorses Policy T1: Enabling Sustainable Travel, particularly reference to future travel patterns in Sheffield being characterised by re-opening the Barrow Hill Railway Line to passengers, including improved connectivity between Sheffield and Chesterfield/ North East Derbyshire.

(Geoff Blisset, Transportation Assessment & Studies Officer, Highways Development Control. [REDACTED])

Climate Change

The following comments are focussed on Part 1: Vision, Spatial Strategy, Sub-Area Policies and Site Allocations:

It is welcomed that climate change is one the key aims of the proposed Sheffield Plan and that it is recognised that Sheffield, along with other cities around the world, will need to play its part in responding to the climate emergency. Both climate change mitigation and adaptation are featured heavily in the Plan and steps to address both issues are set out clearly.

Please note the following points:

- In The Vision – Our City in 2039 it is stated that net zero will have been achieved by 2030, which is an ambitious and welcomed target. However, this is included and somewhat lost in a wider point about reducing income and health inequalities. Climate change would benefit from having its own standalone section within the overall vision to cover emissions reduction/net zero but also climate resilience and enhancement and protection of the natural environment.
- In the Plan Objectives (Objectives for an environmentally sustainable city) there is an objective to make efficient use of natural resources, which is supported. It is considered that this could be widened to also include the prioritisation, protection and enhancement of these natural resources.
- With regards to Policy Objective T1: Enabling Sustainable Travel, there should be more of an emphasis on the role and growth of active travel (cycling and walking). The Policy Objective strongly focusses on low carbon and zero carbon

vehicles and infrastructure, but facilitating and promoting active travel through planning, design and development should also be prioritised where possible.

(Caroline Toplis, Programme Manager – Climate Change. [REDACTED])
[REDACTED]

Adult Social Care and Health

The proposed plan is positive for the following reasons:

- The positive aims of reducing carbon emissions by developing carbon absorbing habitats, reuse of buildings where possible and using sustainable/ recycled materials.
- Meeting different housing needs through requiring 100% of new builds to be accessible and adaptable and ensuring specialist provision is to be wheelchair adaptable or accessible.
- Ensuring national space standards are complied with.
- Having high densities for development in or near to urban centres which would assist with reducing land footprint and contribute to meeting future housing needs within Sheffield.

(Claire Moore, Project Officer – Commissioning, Safeguarding and Performance, Adult Social Care and Health. [REDACTED])
[REDACTED]

Yours sincerely

Chris Henning
Director of Place