

From: [REDACTED]
To: [REDACTED]
Subject: Local Plan Representation: Camstead
Date: 17 February 2023 11:16:21
Attachments: [Sheffield City Council Local Plan Reprs Camstead.pdf](#)
[01 - 000-Site Location Plan-A.pdf](#)

Dear Planning Department,

Please find attached local plan representation on behalf of my client Camstead on the Emerging Draft Sheffield Local Plan.

Please can you confirm receipt of this representation and form in which it is submitted.

Kind regards,

--

Rachel Reaney, MRTPI



[REDACTED]

[REDACTED]

Website: <https://www.astrumplanning.co.uk>

161 Bilton Lane, Harrogate, HG1 3DQ

Company Registration Number: 12969998

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Sheffield City Council
Forward & Area Planning
Howden House
1 Union Street
Sheffield
S1 2SH



17 February 2023

Dear Sir/Madam,

Representation on Emerging Draft Local Plan

Introduction

- 1.1 This representation is submitted to the Emerging Draft Local Plan Regulation 19 consultation on behalf of our client 'Camstead Ltd' ("The Applicant"). Camstead has a development option on Land North of Junction Road, Woodhouse, S13 7RW, with an application for 19 dwellings pending consideration under application reference 22/04356/FUL.

The Site

- 1.2 A location plan which identifies Camstead's site edged in red is enclosed with this representation (**Appendix 1**) ("**Site**"). The Site is approximately 1.54 Hectares (ha) in size, and comprises an area of disused land consisting of secondary woodland, areas of scrub, tall ruderal and short perennial vegetation central to the site and trees close to the site boundaries. Pre-existing tarmac and ballast are present throughout the site. A review of historic aerial imagery shows that the site was left abandoned in 2015. The identified development area is 0.57ha in size.
- 1.3 An active railway line and depot forms the north and east border of the site. The southern boundary is bordered by Junction Road, with residential dwelling's adjacent to the site. The western boundary consisting of further open area of scrub and trees, beyond which is a bus stop and main urban area of Woodhouse.
- 1.4 The northern boundary is screened from the linear row of dense tree cover, which is protected by a tree preservation order no 454.

Detailed Representation on Part 1 'Vision, Spatial Strategy, Sub-Area Policies and Site Allocations.'

Site Allocations

- 1.5 The Site is allocated within the Draft Local Plan for 'housing', under reference SES23 'Land to the North of Junction Road, S13 7RW'. Our client supports the allocation of the site for housing for reasons outlined below.

Suitability & Deliverability

- 1.6 Located within the settlement limits of Woodhouse, the Site represents a highly sustainable location for new residential development. Indeed, the site is well located for local amenities and public transport provisions. A position recognised by its planning history, and current allocation within a 'Housing Policy Area' in the adopted UDP.
- 1.7 Importantly, planning permission has previously been granted for 17 homes onsite, under reference 15/02851/FUL. An application, with a development area of 0.57ha is currently pending consideration, under reference 22/04356/FUL. The client ('Camstead') is actively promoting the application with Sheffield City Council. A copy of the location plan is attached to **Appendix 1** of this representation.
- 1.8 Regarding the suitability of the site; a safe and suitable access can be achieved to accommodate further development at the Site and, given the modest scale of proposed development (19 dwellings), would not result in a detrimental impact on the capacity of the local highway network. As such, residential development on the Site is acceptable in highways safety. This position has been confirmed by a Transport Statement submitted in support of the application.
- 1.9 The Site is not located within a conservation area, or within the setting of a conservation area, and does not comprise any listed buildings or scheduled monuments. There are also no known below ground heritage constraints that would prevent residential development from being delivered on the Site.
- 1.10 The Site is located in Flood Zone 1 where there is a low probability of flooding. Residential development on the Site is therefore acceptable in flood risk terms.
- 1.11 The Site is not located within an environmentally sensitive location and there are no known ecological constraints on the Site. A position established by surveys¹ submitted in support of application 22/04356/FUL. On this point, a study undertaken by Ecus in support of the application has found that the Site is not considered to qualify as Open Mosaic on Previously Developed Land (OMPD) priority habitat.
- 1.12 Importantly, the Site is not within proximity to any areas of ecological interest such as Sites of Special Scientific Interest, Special Protection Areas, Special Areas of Conservation, Ramsar Sites, National or Local Nature Reserves. Residential development on the Site is therefore acceptable in ecology terms. A Biodiversity Net Gain (BNG) Assessment has been submitted in support of the application. Camstead are currently looking into options to achieve a 10% uplift in BNG - through either offsite mitigation or credits. Importantly, the client is fully committed to delivering BNG in support of the development proposal.

¹ Includes additional on-site Bat Survey work by Debra Simons and Invertebrates Survey by ECUS

- 1.13 Trees located to the north and west of the site are protected by Tree Preservation Order (TPO) ref. 454 (2022) 'Land North of Junction Road'. We note that application 22/04356/FUL will require the removal of 3 trees (T4, T5 & T15), 4 tree groups (G1, G2, G3 & G13), as well as the removal of a section of G14 and a section of woodland group (W20) to facilitate development. We note that the removal of these trees will not impact on the ecological value of the area protected by the TPO; and will retain its purpose to visually screen development from the railway to the north.
- 1.14 Given location and former use of the site, the Site also benefits from existing utility connections. It is considered that a suitable drainage strategy can be implemented, and detailed reports have established the presence of gas pipes. On this point, required easements have been achieved as part of application 22/04356/FUL.
- 1.15 A noise survey has also been submitted in support of application 22/04356/FUL. Overall, we consider that the amenity of future residents will be protected through appropriate mitigation, which can be secured via condition.
- 1.16 As required by site allocation SES23 a detailed assessment of the extent of land contamination has been submitted in support of application 22/04356/FUL. The assessment (as required by the draft Policy allocation) provides sufficient mitigation/remediation, which can be secured via condition.
- 1.17 Located within a coal mining risk area. The design of the development has taken into consideration the location of an existing mining shaft as indicated, with no houses placed over the shaft. Appropriate work will be undertaken to ensure the safety of residents onsite are protected.
- 1.18 A development area of 0.57ha has been identified. As outlined in paragraph 1.5 above, the site has a net developable area of 0.57ha. Paragraph 69 of the National Planning Policy Framework ("NPPF") states that small and medium sized sites (such as this Site) can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. Camstead agrees with this statement from their experience in the market and fact that a live application is currently pending consideration. Given its modest size and location; and technical documents undertaken in support of application 22/04356/FUL - the Site is suitable, and well placed to make an important contribution towards the Council's housing supply.
- 1.19 Overall, it is evident that the Site represents a logical and deliverable opportunity for residential development within the emerging Local Plan. We therefore support the continued allocation of the site within the Local Plan.

Detailed Housing Policies

- 1.20 Camstead supports the aspirations of draft Policies SP2 'Spatial Strategy'; SA5 'Southeast Sheffield Sub-Area'; and H1 'Scale and Supply of New Housing', which seeks to deliver the Council's identified housing requirement.
- 1.21 The Site is located within the 'Southeast Sheffield Sub-Area' which is covered by Draft Policy SA5. The draft policy seeks to deliver approximately 1,640 new homes, and 22.6 hectares of employment land (through a combination of planning permissions and new site allocations). Longer term housing growth will also take place within Flexible Uses Zones within the Sub-Area ('Broad Locations for Growth') where existing commercial uses will be allowed to transition to residential use (see Policies H1 and NC16). Camstead supports the ethos of this policy, but notes that greenfield land that occupies a sustainable location should not be discounted.

- 1.22 Draft Policy H1 is also noted, in particular criteria (b) which states that ‘the target for homes delivered on previously developed land is 85% across the period 2022 to 2039’; and criteria (c) which seeks to deliver new housing on sites that already have planning permissions on the identified housing site allocations, through a small site allowance and through large site windfalls. Regarding criteria (b), whilst the ethos of the policy is supported - it does appear overly restrictive, and could be difficult to monitor. On criteria (c) it is considered that the wording of the policy implies that only allocated sites with planning permission at the time of adoption, should deliver the Council’s required housing growth. We advise that the wording is revisited to prevent confusion. However, it notes that it is our intention to secure planning permission on this Site before spring 2023.
- 1.23 Draft Policy H1 also supports the delivery of land allocated for residential development within Policies SA2 to SA8. This position is supported by Camstead. This includes land allocated under reference SES23, which will form an important contribution towards housing delivery for reasons outlined above.

Detailed Representation on Part 2: Development Management Policies and Implementation

Climate Change - Policies ES1, ES2, ES3 & ES4

- 1.24 Climate change is identified as one of the key issues for the Local Plan. Draft Policies ES1, ES2, ES3 and ES4 sets out how the City Region will help support the delivery of net zero carbon during the plan period. Amongst other things, this includes minimising the need to travel, promoting the use of sustainable modes of transport, and supporting developments that take available opportunities to mitigate and adapt to climate change, minimise greenhouse gas emissions, reuse existing buildings (wherever possible), and make prudent and efficient use of natural resources.
- 1.25 Camstead supports the above objectives and notes that the Site’s location means it is well placed to contribute towards meeting them. However, Camstead considers that Policies ES1, ES2, ES3 and ES4 may need to be reviewed for consistency with other legislation and national policy, including recent amendments to building regulations.
- 1.26 Draft Policy ES7 ‘Safeguarding of Mineral Resources and the Exploration, Appraisal and Production of Fossil Fuels’ states ‘where a site is likely to have surface mineral resources, applicants should investigate the economic potential of the site for extraction of these resources before development’. Camstead notes that where a site has been allocated for a particular form of development that this should not be a prerequisite.

Affordable Homes – Policy NC3

- 1.27 Camstead supports the need to deliver affordable homes in the City Region. However, we object to the wording of Draft Policy NC3 which states that a contribution towards the provision of affordable housing will be required from the following housing developments: ‘(b) sites with a capacity of less than 10 dwellings **which would provide 10 or more dwellings when combined with an adjoining allocated site or vacant site**’. Camstead considers the wording of criteria (b) as onerous, as applicants will have no control on land not within their ownership. This could result in the stalled delivery of housing, with many developers being held to ransom from neighbouring landowners. This in turn could result in a site becoming unviable and will prevent the delivery of smaller housing sites, which play a valuable contribution towards housing delivery. We therefore request that the requirement outlined in bold above is removed, with proposals of less than 10

dwellings to be excluded from delivering affordable homes, in line with case law and national guidance.

Design – Policies NC4 and NC8

- 1.28 Draft Policy NC4 requires in developments of fewer than 50 new homes, 100% should be designed to be accessible and adaptable dwellings. In developments of 50 or more new homes, 98% should be designed to be accessible and adaptable dwellings and the remaining 2% should be wheelchair adaptable dwellings.
- 1.29 Camstead is supportive of the principle of providing housing to meet the needs of older persons and disabled people. However, Camstead is particularly concerned with the above requirements.
- 1.30 Camstead would like to highlight that if the Council wishes to adopt the higher optional standards for accessible and adaptable homes the Council should only do so by applying the criteria set out in the PPG. On this point, we consider that the evidence provided does not fully justify the Council's position on this matter.
- 1.31 It is important that if the Council are seeking the higher optional standards that the evidence is forthcoming. PPG (ID 56-007) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability.
- 1.32 The NPPG states that where a local planning authority adopts a policy to provide enhanced accessibility or adaptability, they should do so only by reference to requirement M4(2) and / or M4(3) of the optional requirements in the Building Regulations and should not impose any additional information requirements or seek to determine compliance with these requirements, which is the role of the Building Control Body.
- 1.33 Camstead note that although there is evidence of an ageing population having regard to the PPG, this does not amount to the justification required in Policy NC4. Indeed, not all people who by or move into new homes need or wish to have such provision. On this point, it is important that the Council recognises the viability implications of requiring all houses to meet these enhanced standards. It is likely that this requirement will make a large proportion of sites identified by the Council as suitable for development unviable. The need for a viability caveat is therefore essential to this policy and should be included.
- 1.34 It is also noted that this Policy is linked to NC8, criteria (c). This should be considered in respect of the points outlined above.

Biodiversity Net Gain – Policy GS5 & GS6

- 1.35 Camstead supports the delivery of net gains for biodiversity. However, we noted that Policy GS6 promotes BNG in excess of 10%, where it meets a list of identified criteria. This includes i) there is a particular ecological need in that location based on evidence in a biodiversity/nature recovery action plan or as part of the Local Nature Recovery Network mapping, or ii) there is evidence of rare/protected species within, or close to, the development site; or iii) the site starts with very low or nil existing biodiversity value. We consider that this requirement should be reviewed in the context of secondary legislation coming into force, with justification provided for the excess requirement. On this point, criteria (iii) will apply to brownfield sites, which will require remediation. As we are aware remediation is a significant cost and can challenge the viability of a site. A

requirement in excess of 10% could further threaten the viability of brownfield sites which the Council are relying upon to deliver 85% of housing need. Further research should be undertaken by SCC.

Conclusion

- 1.36 To conclude, Camstead **supports** the allocation of the Site within the Emerging Local Plan and is well placed to make a positive contribution to housing need. The Site is suitable, available and deliverable now, with a planning application for 19 dwellings pending consideration with Sheffield City Council.
- 1.37 Detail comments are provided on policies which threaten deliverability, with proposed amendments suggested.
- 1.38 Camstead reserves its position to submit further written representations to any subsequent amendments to the Local Plan, including (but not limited to) any amendments detailing the allocation of land for development.
- 1.39 Finally, Camstead would be delighted to work positively with the Council during the remainder of the Local Plan preparation process, including attendance at the Examination in Public (EIP) in due course.
- 1.40 Should you wish to discuss any of the above further, please do not hesitate to contact me via the details outlined below.

Yours Sincerely,



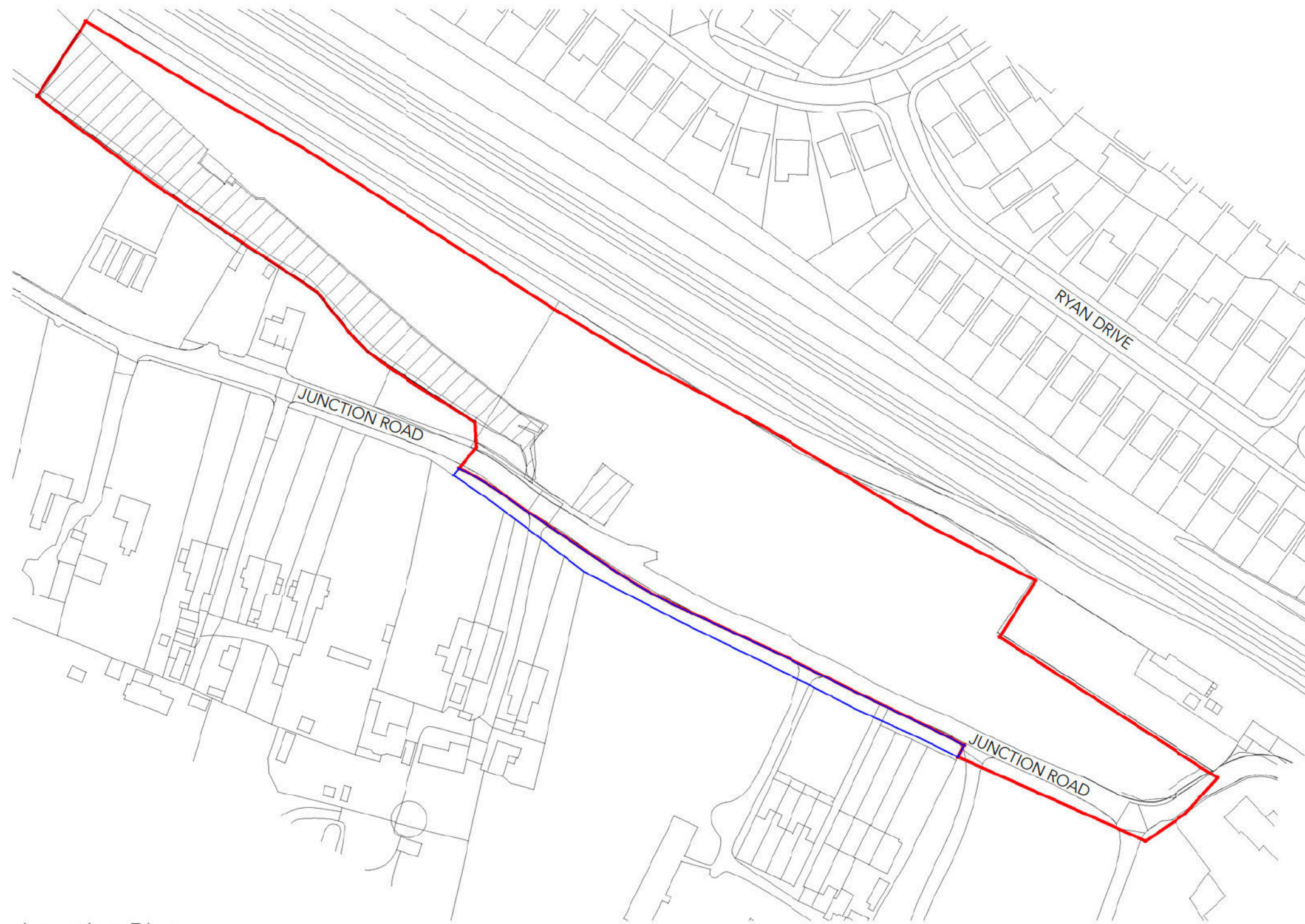
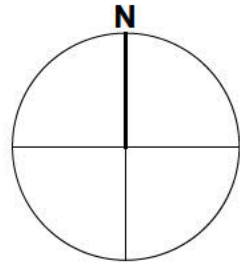
Rachel Reaney, MRTPI



161 Bilton Lane, Harrogate, HG1 3DQ

Company Registration Number: 12969998

Enc. Appendix 1 – Location Plan for Application 22/04356/FUL



Site Location Plan
1 : 1250

<p>1 : 1250</p> <p>Contractor must verify all dimensions on site before commencing any work or shop drawings. If this drawing exceeds the quantities taken in any way the Architects are to be informed before the work is initiated. Only figured dimensions to be taken from this drawing. Do not scale off this drawing. Drawings based on Ordnance Survey and / or existing record drawings - design and drawing content subject to Site Survey, Structural Survey, Site Investigations, Planning and Statutory Requirements and Approvals. Authorised reproduction from Ordnance Survey Map with permission of the Controller of Her Majesty's Stationery Office. Crown Copyright reserved. Enjoy Design Ltd.</p>	<p>Notes. Site boundary based on HM Land Registry title plan no. SYK381879</p>	<p>A Boundary Revised</p>	<p>WD 06/02/23 By Date Ch.</p>	<p>Suitability S2 PLANNING Status:</p>	<p>Client: Camstead Ltd Job No: 21,063 Project: Junction Road, Woodhouse, Sheffield Title: Site Location Plan Date: 26/09/22 Scale: 1 : 1250@A1 Check: WD Drawing No: JCT-ENJ-XX-XX-DR -A-01 - 000 Rev: A Drawn: CJ</p>	
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From: [REDACTED]
To: [REDACTED]
Subject: Re: Local Plan Representation: Camstead
Date: 17 February 2023 17:11:08
Attachments: [92e1bfc6b2d562235a5957a7ddcedf6e_Reg_19_Consultation_Form_-_Parts_A_and_B_\(2\).docx](#)

Dear Strategic Planning Team,

Please see accompanying form.

Kind regards,

Rachel

On Fri, 17 Feb 2023 at 12:43, SheffieldPlan <sheffieldplan@sheffield.gov.uk> wrote:

I confirm receipt of your email.

Thanks

Strategic Planning Team

From: Rachel Reaney <[REDACTED]>
Sent: 17 February 2023 11:15
To: SheffieldPlan <sheffieldplan@sheffield.gov.uk>
Subject: Local Plan Representation: Camstead

Dear Planning Department,

Please find attached local plan representation on behalf of my client Camstead on the Emerging Draft Sheffield Local Plan.

Please can you confirm receipt of this representation and form in which it is submitted.

Kind regards,

--

Rachel Reaney, MRTPI



[REDACTED]

[REDACTED]

Website: <https://www.astrumplanning.co.uk>

161 Bilton Lane, Harrogate, HG1 3DQ

Company Registration Number: 12969998

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Sheffield Plan Consultation Representation Form January – February 2023

Please use this form to provide representations on the Sheffield Local Plan. Sheffield City Council must receive representations by **5pm on 20th February 2023**. Only those representations received by that time have the statutory right to be considered by the inspector at the subsequent examination.

Responses can be submitted via

- the electronic version of the comment form which can be found on the Council's web site at: <https://haveyoursaysheffield.uk.engagementhq.com/draft-local-plan>
- an e-mail attachment: sheffieldplan@sheffield.gov.uk
- post to: **Strategic Planning Team, Planning Service, 4th Floor, Howden House, Sheffield S1 2SH**

Please note:

- Representations must only be made on the basis of the legal compliance, compliance with the Duty to Co-operate and/or soundness of the Plan.

Please read the guidance note, attached or available on the Council's webpage###, before you make your representations. The Local Plan and the proposed submission documents, and the evidence base are also available to view and download from the Council's Local Plan webpage:

Data Protection Notice:

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>

Due to the Data Protection Act 2018, Sheffield City Council now needs your consent to hold your personal data for use as part of the Sheffield Plan process. If you would like the Council to keep you informed about the Sheffield Plan, we need to hold your data on file. Please tick the box below to confirm if you would like to 'opt in' to receive information about the Sheffield Plan. Note that choosing to 'opt in' will mean that the Council will hold your information for 2 years from the 'opt in' date. At this time we will contact you to review if you wish to 'opt in' again. You can opt-out at any time by emailing sheffieldplan@sheffield.gov.uk or by calling 0114 2735897.

Please tick/ delete as appropriate:

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

Yes

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

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

No

Printed Name: Rachel Reaney

Signature: RReaney

Date: 17.02.2023

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: C/O The Agent
Organisation (if applicable): Camstead Ltd
Address: C/O The Agent
Postcode:
Tel:
Fax:
Email:

2. Agent Details (if applicable)

Agent: Rachel Reaney
Organisation (if applicable): Astrum Planning Ltd
Address: 161 Bilton Lane, Harrogate
Postcode: HG1 3DQ



Part B - Your representation

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

Name or Organisation: Camstead Ltd

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

Policy Number:

Paragraph Number:

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

Please see accompanying representation. Amendments to policies required to ensure delivery.

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.

Please see accompanying representation

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

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

Please see accompanying representation

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.