

From: [REDACTED]
To: [REDACTED]
Subject: RE: Representations to the Draft Local Plan
Date: 03 March 2023 12:24:28
Attachments: [image010.png](#)
[image011.jpg](#)
[image012.png](#)
[image013.jpg](#)
[image014.png](#)
[image001.png](#)
[image002.jpg](#)
[Part B Forms - Commercial Property Partners.docx](#)
[CPP Local Plan Submission.pdf](#)

Hi Laura,

Further to the below I'm emailing to submit on their behalf the attached letter from local agents Commercial Property Partners.

It's understood that this is a late submission, but please do note that CPP are not wishing to take part (or have Urbana represent them) in EiP. They do appreciate that the Inspector will not be obligated to consider their comments going forward.

However, it's very much hoped -especially given their prominent position in the city's commercial property market- that yourselves as officers will be able to give due consideration to their short letter.

Kind regards,

Charles Dunn

Director

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Steel City House, West Street, Sheffield, S1 2GQ | [REDACTED]

Wool & Tailor Building, 10-12 Alie Street, London, E1 8DE | [REDACTED]

From: SheffieldPlan <sheffieldplan@sheffield.gov.uk>

Sent: Monday, February 20, 2023 6:37 PM

To: Charles Dunn [REDACTED]; SheffieldPlan <sheffieldplan@sheffield.gov.uk>

Subject: RE: Representations to the Draft Local Plan

Many thanks Charles

Best wishes, Laura

From: Charles Dunn <[REDACTED]>

Sent: 20 February 2023 16:57

To: SheffieldPlan <sheffieldplan@sheffield.gov.uk>

Subject: RE: Representations to the Draft Local Plan

Good afternoon,

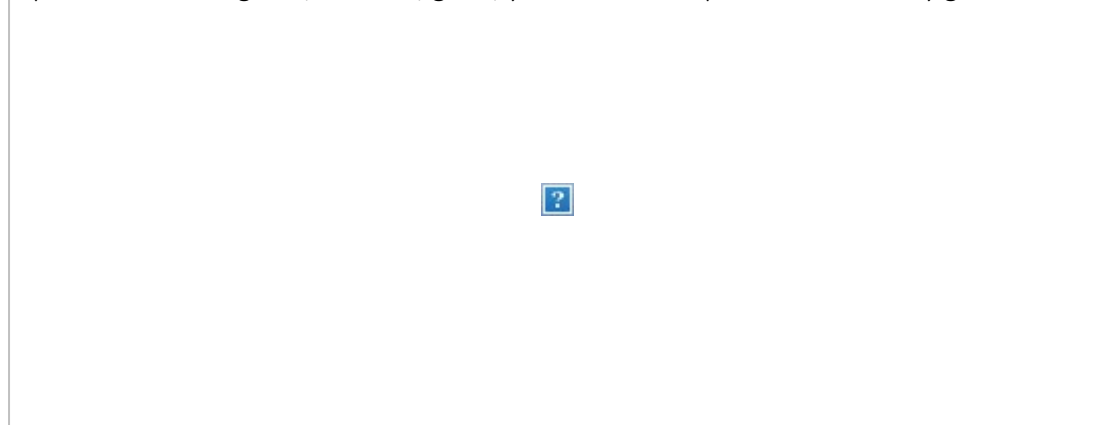
Further to the below I have noted that the representation on behalf of SHU was not the final version. Please see the attached update to supersede that supplied earlier, alongside an updated Part B form, stating policy specifics.

Kind regards,

Charles Dunn

Director

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Steel City House, West Street, Sheffield, S1 2GQ | [REDACTED]

Wool & Tailor Building, 10-12 Alie Street, London, E1 8DE | [REDACTED]

From: Charles Dunn

Sent: 20 February 2023 13:12

To: sheffieldplan@sheffield.gov.uk

Subject: Representations to the Draft Local Plan

Good afternoon,

As per the subject above please find attached the following as submission to the current consultation:

- Consultation form Part A
- Consultation form Part B filled out for the following parties:
 1. Hartwood Estates
 2. Quinta Developments
 3. Sheffield Hallam University
 4. Aldene Developments Limited
 5. MHH Contracting Limited
 6. Heritage Estates (Yorkshire) Limited
- Corresponding representations relating to land/sites listed as follows:
 1. Land adj Moor Valley, Mosborough
 2. Land N and E of Myers grove Lane, Malin Bridge
 3. Land at Totley Hall Road, Totley

4. Land NE of Aldene Road, Wadsley
 5. Land S of Loicher Lane
 6. Land E of Long Lane, Worrall
- A separate representation from Sheffield Hallam University relating to PBSA and the Sheffield Innovation Spine, not related to a specific site.

I would be grateful of confirmation of receipt (and acceptance of representations) by return.
Kind regards,

Charles Dunn

Director

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Steel City House, West Street, Sheffield, S1 2GQ | [REDACTED]

Wool & Tailor Building, 10-12 Alie Street, London, E1 8DE | [REDACTED]
[REDACTED]

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Part B - Your representation

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

Name or Organisation: OBO Commercial Property Partners Limited

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

Policy Number: SP1, SP2, SA1, H1

Paragraph Number: Various.

Policies Map: -

2. 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

3. 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 refer to accompanying letter.

Continue on a separate sheet if necessary

4. 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 refer to accompanying representation document.

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.

5. 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

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

7.

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.



COMMERCIAL PROPERTY PARTNERS

Abbey House
11 Leopold Street
Sheffield
S1 2GY

W: www.cpppartners.co.uk

Strategic Planning Team,
Planning Service,
4th Floor,
Howden House,
Sheffield
S1 2SH

17th February 2023

Dear Sirs,

Sheffield Draft Local Plan

I am writing in order to offer CPP's thoughts on the Draft Local Plan, the likelihood that it will ultimately deliver its objectives for Sheffield, and its accordance with planning policy as it relates to 'plan making' requirements set out by the NPPF.

CPP are a firm of Chartered Surveyors, with the head office in Sheffield, dealing with businesses, Occupiers, Landlords and Investors throughout the Region. It is important to note that this response is not in relation to any particular site or client and is an independent view of CPP, whose objective is for the City to grow to its potential.

We appreciate that no local plan can ever be perfect and please everyone and we acknowledge that the benefits of having a local plan substantially outweigh the risks of not having one at all. However, it is important that further consideration should be given to elements, before being recommended for adoption for years to come.

Housing Need

CPP have serious concerns that the Plan in its current form is failing in its obligations, in particular as far as it relates to housing targets and the national policy requirement to seek to provide for objectively assessed development needs. While it is recognized that the Green Belt is a constraint to certain forms of development, it is clear that Government guidance (the 'standard methodology') indicates that Sheffield's annual housing need is in excess of 3,000 homes per year. The Draft Plan is not seeking to provide for this, in spite of past under delivery, instead aiming for circa 2,100 homes per year. This is likely to represent a major failure of the Plan.

Working so closely in the city as we do, it is also extremely concerning that such a high proportion of the housing that is proposed (such as it is) is focused in the City Centre, which as is widely accepted currently faces extremely restrictive viability concerns. We actively deal with Central Area sites on a day-to-day basis where the deliverability for residential development is simply impossible in current market circumstances.

That this is the case also appears to be acknowledged by the emerging Plan itself, with the associated Whole Plan Viability Assessment stating: 'Sheffield City Council should be cautious about relying on development in the lower value areas and in the Central Area to deliver its housing requirements.'

What's more, this is against a background context in which the Council's own documents accept that the majority of housing demand -over 80%- is for traditional family housing, whereas just 25% of new dwellings built in the city in the prior 5-year period were of this type (SCC Strategic Housing Market Assessment 2019).

Accordingly, our conclusion must be that: the Draft Plan isn't proposing to provide for enough housing; it isn't proposing to do so in areas where it is actually deliverable; where there is strong market demand for family housing; and, it isn't proposing to do so in a way that will actually respond to the objectively assessed need.

This means that the Draft Plan isn't 'sound' in its current form.

Employment Land

Beyond the question of housing, we also have a keen awareness of and interest in the commercial property market and the level of growth targeted by the Plan in this respect is also a serious concern. The net target for employment land is just 7.27 hectares per year. Accounting for losses and so including a replacement allowance, the figure proposed to be provided for is 11.5 hectares annually, with a total requirement of 195.5 hectares. This is based on the 2021 Employment Land Review Update (ELR), but it needs to be acknowledged that this document outlines a number of different forecasting scenarios in order to reach this figure. While the figure is not as low as certain scenarios might have dictated, it still falls short of the employment land need that would otherwise be required in alignment with the level of housing growth under the Standard Methodology.

Moreover, a longer-term retrospective view finds that since 1989 employment land delivery equates to 11.36 hectares per year. The ELR finds that delivery has been less than this in the shorter term (2012-21), which is in line with wider market trends for the UK across this period of stagnant productivity, wage growth, relatively poor GDP growth, and more locally poor growth in GVA for the region. This is precisely the reason why the more ambitious growth options put forward must be pursued.

Beyond the above, our experience in the market very strongly supports this. The references made in the ELR to market consultation are correct: existing older and poor quality industrial and employment stock give a misleading impression of the market, in which there is an acute and growing demand for new, high-quality space for both industrial and in particular warehousing or 'sheds'.

Employment land growth on the basis of lower delivery that results in the current [redacted] meet the underlying need and will not allow Sheffield to take advantage of [redacted] accurately described in paragraphs 8.9 and 8.10 of the ELR.

[redacted] Review's authors is therefore more heavily weighted on a higher figure of 230 to [redacted] significantly greater than is currently being planned for. CPP believe that this higher [redacted] for the Draft Plan to be successful in achieving its objectives and in being

City Centre Growth

With respect to the treatments of employment uses in the City Centre, it is stressed again that as a business we are very closely 'plugged in' to the nature of employment uses and retail and office space in the City Centre. In this respect it is disappointing not to see more recognition in the Draft Plan as to how intimately connected new housing is with retail and office activity, especially in the City Centre. There is also a concern on a reliance of Night Time Industries to bolster the city centre economy, with little focus towards the desperately needed daytime population (office workers, retailers and visitors). Sheffield is not attracting enough people into the city centre during the day. Increasing the daytime population should be a key priority of the Local Plan.

While the Plan does examine demographics and what different levels of job growth may mean for housing need, there is no underlying recognition that these critical factors of growth rely on and can positively thrive off each other.

It is believed that the approach taken to utilise potential job growth figures as a tool to seek to provide for lower housing delivery is an unacceptably negative one, out of keeping with the requirements of the NPPF for plan-making. Conversely, it must instead be recognised that the delivery of more housing will allow for and encourage more job creation, and in turn more jobs will increase demand for and enable the viable delivery of more housing -- this is a net benefit to Sheffield in the form of a positive feedback loop that will lead to greater prosperity and success for the city.

Importantly, given the geographic concentration of such growth of employment uses (i.e. retail and office) in the City Centre, the Council should be more aware that adopting a more positive approach such as that described is likely to increase the chances of being able to deliver the centrally-focused growth that they are seeking.

Conclusions

Given the concerns expressed in the discussion above, CPP do not believe that the Draft Plan in its current form will be able to achieve its Vision or the Aims that underpin this, in particular those relating to thriving neighbourhoods and communities (Aim 3), a strong economy (Aim 4) and a vibrant City Centre (Aim 5).

While the principles underlying the overall approach are of course supported, the realities of the housing and wider development and economic markets in which we are operating are very clear in guiding us to the conclusion that the Plan 'as is' will fail to deliver for Sheffield.

It is not believed that it will succeed in providing for the fundamental objectively assessed needs for housing and employment land. Fulfilling this need is the most critical function of the Plan and without success in this respect it cannot be expected to deliver on any of its other objectives. Without an appropriate and deliverable approach in this respect, the Plan isn't 'positively prepared', it isn't 'justified', and it won't be 'effective'. It therefore doesn't pass the tests of soundness that the NPPF sets out and we therefore look forward to seeing it evolving to suitably address these deficiencies.

There are many parts of the Draft Plan which will deliver what is intended, however, we believe with some extra thought, encouragement and ambition, the Sheffield Plan could truly be the guide for years to come as it is intended.

