

Representation on the Sheffield Plan Publication (Pre-Submission) Draft

Respondent details

Comment ID number: PDSP.034.001

What is your Name: James Hobson

If you are making this representation as a member of an organisation, what is the name of your organisation:

JEH Planning Limited

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

Fitzwilliam Wentworth Estate

Document

Which document to you wish to make a representation on:

Part 1: Vision, Spatial Strategy, Sub-Area Policies and Site Allocations

Which section of the document is your representation on:

Policy SP1: Overall Growth Plan

Which paragraph/site/map layer of the document is representation on:

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

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- 3.0 Part 2: Policy NC3- Provision of Affordable Housing 8
- 4.0 Part 1: Policy H1 Criterion e.) Spatial Distribution - Scale and Supply of New Housing 9
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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

Please see the conclusions and the key recommendations in the attached report

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)

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

The representations we have submitted raise fundamental issues regarding the soundness of the draft Local Plan that require further scrutiny.

From: [REDACTED] on behalf of [REDACTED]
To: [REDACTED]
Subject: FW: Your response on Draft Local Plan - Fitzwilliam Wentworth Estate
Date: 20 February 2023 09:48:43
Attachments: [image001.jpg](#)
[FWE Reps Sheffield Plan Publication Version Dec2022 Final 19022023.pdf](#)
[image002.jpg](#)

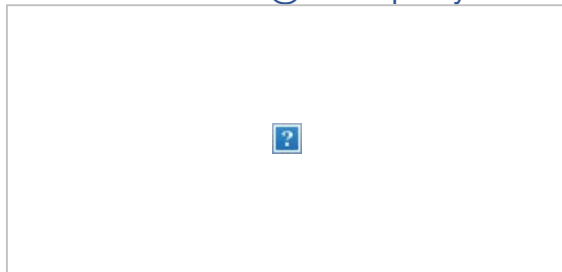
Alaina Briggs (she/her)
Equalities and Engagement Officer
Equalities & Engagement Team
Policy, Performance and Communications
Sheffield City Council
Phone: [REDACTED]

I am currently hybrid working from home and the office. My working days are Monday, Tuesday, Thursday and Friday. I am on leave every Wednesday.

Website: www.sheffield.gov.uk/equality

Website: <https://www.sheffield.gov.uk/home/campaigns/equality-partnership>

Follow us on twitter: @SCCEqualityPart



From: James Hobson [REDACTED]
Sent: 19 February 2023 20:21
To: consultation <consultation@sheffield.gov.uk>
Subject: RE: Your response on Draft Local Plan - Fitzwilliam Wentworth Estate
Dear Sir/Madam

To accompany the representation form we have completed and submitted on behalf of Fitzwilliam Wentworth Estate below, please find attached the full version of our representations for your consideration.

Please confirm that these representations have been duly made.

Kind regards

James

James Hobson

Managing Director



Address: Lindley House Hungate Bishop Monkton Harrogate HG3 3QL

Telephone: [REDACTED]

Website: <https://jehplanning.com/>

From: Have Your Say Sheffield <notifications@engagementhq.com>

Sent: Sunday, February 19, 2023 8:16 PM

To: James Hobson [REDACTED]

Subject: Your response on Draft Local Plan

Thank you for your response on [Draft Local Plan](#)

Have Your Say Sheffield

Hi James Hobson,

Thank you for completing the survey Publication Draft Sheffield Plan representation. Your responses are listed below for your reference:

If you are making this representation as a member of an organisation, what is the name of your organisation?

JEH Planning Ltd

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role.

Fitzwilliam Wentworth Estate

Which document do you wish to make a representation on?

Part 1: Vision, Spatial Strategy, Sub-Area Policies and Site Allocations

Which section of the document is your representation on?

Policy SP1: Overall Growth Plan

Do you consider the Local Plan is legally compliant?

Yes

Do you consider the Local Plan is sound?

No

Do you consider the Local Plan complies with the duty to co-operate

Yes

Please give details of why you consider the Local 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 Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

See attached report with the following contents: 1.0 Introduction. 3 2.0 Part 1: Policy SP1 - (Criterion a) Housing Growth Requirements 4 3.0 Part 2: Policy NC3- Provision of Affordable Housing 8 4.0 Part 1: Policy H1 Criterion e.) Spatial Distribution - Scale and Supply of New Housing 9 5.0 Part 1: Policy SA9 - Chapeltown/High Green Sub-Area 15 6.0 Part 1: Policy H1 Criterion g.); Range of New Housing - Scale and Supply of New Housing 16 7.0 Part 2: Section 5 - A Strong Economy 19 8.0 Part 1: Policy SP1 (Criterion b) - Employment Land Requirements 20 9.0 Part 1: Policy SP 2: Spatial Strategy for Employment 25 10.0 Part 1: Policy SP1 Protection of Green

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Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 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 Local 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 the conclusions and the key recommendations in the attached report

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)

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

The representations we have submitted raise fundamental issues regarding the soundness of the draft Local Plan that require further scrutiny.

Thank you,
Sheffield City Council

Other projects that might interest you

Sheffield City Partnership Board Equality Monitoring

Project for Sheffield City Partnership Board members and presenters.

[View Project](#)

Commissioning Plan for Mainstream Education Places 2023-2026

The Council is consulting on our Commissioning Plan for Mainstream Education Places 2023-2026,...

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The Stocksbridge Towns Fund Board is looking to work with local transport providers to deliver a...

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Representations

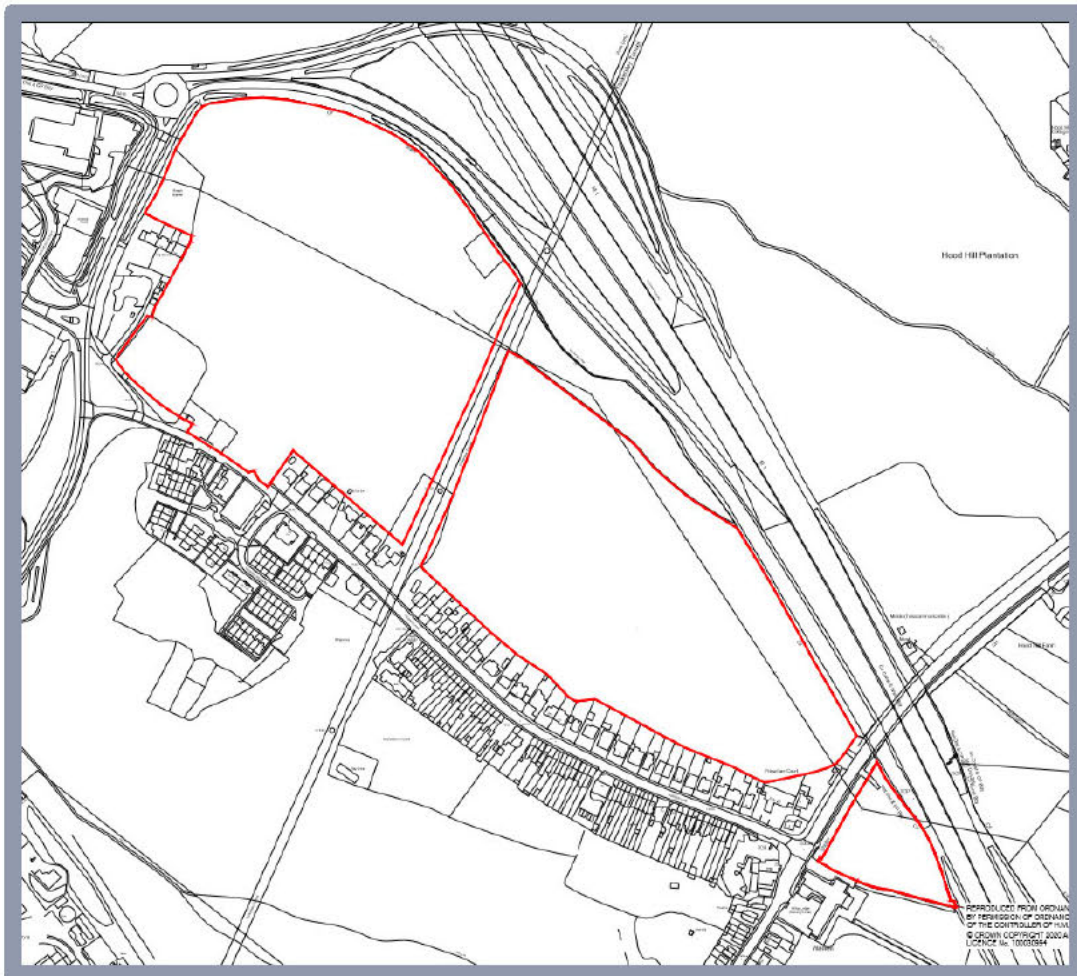
Client: Fitzwilliam Wentworth Estate

Proposal: Sheffield Plan Publication Version December 2022

Sites: Land at Thorncliffe Road, Warren Lane and White Lane (A6135), Chapeltown S35 2YA (HELAA REF No S03112, S03113 and S03312)

Date: February 2023

Ref: JEH035



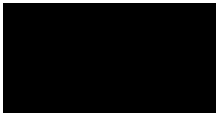


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JEH Planning Limited. Registered in England Number: 12192653
Registered Office as above

Representations Document control

Document:	Representations
Project:	Sheffield Plan Publication Version
Client:	Fitzwilliam Wentworth Estate
Job Number:	JEH035
File Origin:	

Revision:	Final		
Date:	February 2023		
Prepared by:		Checked by:	
		Approved By:	
Description of revision:			

Representations

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Representations

1.0 Introduction.

1.1 These representations are prepared by JEH Planning and have been made on behalf of the Fitzwilliam Wentworth Estate 'our client' in response to the Publication Version of Draft Sheffield Local Plan that was released in January 2023 for consultation.

1.2 Our client has a landholding interest within the City of Sheffield and these representations specifically relate to the active promotion of a proposed mixed-use employment and housing site known as Land at Thorncliffe Road, Warren Lane, White Lane, Chapelton.

1.3 This site has previously been actively promoted through the 'Call for sites' HELAA process that was undertaken in February 2020 and have been split into three separate parcels with these being HELAA REF Nos S03112, S03113 and S03312.

1.4 Our client is firmly committed to unlocking the right kind of economic and sustainable growth for the region with the objective of achieving development allocations within key strategic locations of the City that reflect important spatial and sustainability principles. Our client fully embraces the local plan process of evaluating spatial strategies and this development prospect would deliver the right kind of employment and housing to achieve the Council's objectives.

1.5 Whilst a recent updated draft National Planning Policy Framework (NPPF) has been released for consultation as well as the Prospectus, we consider that given the draft status of these documents the proposed changes carry no weight in the consideration of the Council's Local Plan process and so our representations are submitted in the context of the current national guidance regarding plan making.

1.6 This statement has been prepared and formatted using the relevant policy headings taken from the draft Sheffield Plan document. Where relevant our representations also examine in detail the background documents and evidenced based work that has been undertaken by the Council to inform the decision making process.

Representations

2.0 Part 1: Policy SP1 - (Criterion a) Housing Growth Requirements

Introduction

2.1 Criterion a.) of draft Policy SP1 proposes a requirement of 35,530 new homes by 2039 (2,090 homes per annum from 2022 to 2039) which we consider to be too low and therefore fails the test of soundness.

2.2 Nationally we are facing a housing crisis. It is adversely affected by the broken housing market that afflicts the country as a whole. A lack of appropriate housing options prevents some people from forming their own households, particularly younger adults, whilst those who can, may have to cope with substandard or expensive accommodation. These problems are far too widespread in a city such as Sheffield and must be addressed. The Plan is one of the tools that can be used to take on the responsibility and address these issues.

2.3 One issue in particular is that the proposed housing requirement contradict the Governments objective of levelling up of the country particularly in the North of England. Major cities like Sheffield are in danger of being left behind and the challenges can only be truly met through a more diverse range of new provision including a major boost in the supply of housing.

Policy Context - Planning Positively and the Standard Method

2.4 Paragraph 59 of the NPPF aims to significantly boost the supply of housing. Paragraph 60 recommends that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment conducted using the standard methodology in national planning guidance unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends signals.

2.5 Given this context, Strategic Housing Market Assessments (SHMAs) primarily informs the production of the Local Plan, and their key objective is to provide the robust and strategic evidence base required to establish the full Objectively Assessed Need (OAN) for housing and provide information on the appropriate mix of housing and range of tenures needed. The NPPG clearly states that they do not set a 'housing target' for the planning authority.

Representations

2.6 Paragraph 11 of the NPPF sets a presumption in favour of sustainable development whereby local plans should meet objectively assessed development needs, with sufficient flexibility to respond to rapid change.

2.7 As expected by NPPF, the housing need in this plan should be derived using the standard method provided in the NPPG for calculating the Local Housing Need (LHN). If insufficient new homes are provided to meet this need, then there is a risk that affordability levels will worsen, and people will not have access to suitable accommodation that meets their needs.

2.8 The standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply. It identifies a **minimum** annual housing need figure but guidance in the NPPG clearly states the figure does not produce a housing requirement figure. (NPPG Paragraph: 002 Reference ID: 2a-002-20190220)

2.9 The NPPG specifically asks when it might be appropriate to plan for a higher housing need figure than the standard method indicates. It reconfirms that the government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. As stated above, the standard method for assessing local housing need provides a **minimum** starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there is a clear acceptance that there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

2.10 The minimum figure for Sheffield under the standard method is 2,923 dpa. While this is calculated over a ten year period it can be applied across the whole plan period, this equates to a total need of 49,691 homes over the period 2022-2039.

2.11 However, paragraph 61 of the NPPF also states that to justify an alternative approach it requires exceptional circumstances to be demonstrated. Sheffield is seeking to justify a lower housing figure than this Local Housing Need but we consider exceptional circumstances have not been demonstrated to allow them to deviate from the standard method.

Representations

2.12 Sheffield needs to increasingly assert its role as one of the main drivers of economic growth in the north of England. This can only be done through prioritising new initiatives and projects to develop the economy. This should include a more ambitious employment growth plans for the area combined with a housing need that is greater than proposed within the draft Local Plan which is significantly below the standard method figure.

2.13 A fundamental part of the standard method calculation is applying the “cities and urban centres uplift” of 35 per cent for England’s 20 biggest cities and towns which includes Sheffield. The rationale for the cities and urban centres uplift is confirmed in the Government response to the local housing need proposals in “Changes to the current planning system” dated April 2021. This document says the uplift is to ensure consistency with the Government’s Manifesto commitment to see 300,000 homes per year delivered by the mid 2020s and this target has more recently been re confirmed by the Levelling Up Minister. The increase in the number of homes to be delivered is expected to be met by the cities and urban centres themselves, rather than the surrounding areas. In considering how need is met the Government has confirmed that in the first instance, brownfield and other under-utilised urban sites should be prioritised to promote the most efficient use of land but this does not necessarily preclude the release of other sites if these meet certain criteria.

2.14 Government state that the approach of focusing housing growth on the biggest towns and cities is also *‘to ensure that homes are built in the right places, to make the most of existing infrastructure, and to allow people to live nearby the services they rely on, making travel patterns more sustainable.’*

2.15 Within the Housing, Economic Growth and Demographic Modelling prepare by Icenid dated July 2021 their modelling work concludes that all the housing projections are lower than the Standard Method of 2,923 dwellings per annum and there is no reason to exceed this level of housing growth to meet the economic needs of the city.

2.16 This report seeks to dismiss the 35% cities uplift element of the standard method by saying at paragraph 9.15 there is a better balance between housing and employment growth using the older version of the standard method (i.e. without the urban centres uplift). However, this approach misses the point that the Government have specifically confirmed that the 20 largest cities and towns are proposed to take more than their projected uplift to fully address the national housing crisis as these types of settlements are considered to be the focus to deliver the most sustainable locations for housing develop and no exceptional circumstances have been justified by the Council as to the reasons for proposing a lower LHN figures.

Representations

2.17 Evidence that other cities have taken the decision of adopt and embrace the more ambitious 35% uplift LHN figure to address the housing crisis can be found in Greater Manchester where there is an emerging strategic plan which includes large scale Green Belt releases justified under exceptional circumstance and also Leicester where greenfield sites are being delivered to accommodate the anticipated increase in growth.

2.18 The Publication Draft Sheffield Plan makes the case for rejecting the 35% uplift for their urban centres because it would result in a housing growth figure that outpaced the anticipated level of jobs growth. However, Sheffield is in competition with other cities across the UK and world to attract and retain the skilled workers that will be critical to delivering high and sustained levels of economic growth.

2.19 We consider that greater emphasis should be placed on stimulating economic growth and job creation to achieve higher and more sustained productivity to ensure Sheffield plays a key role within the region and at national level. Within this context it should be emphasised that Government advises that the LHN figure of 2,923 pa for Sheffield is the *minimum* need that has been calculated and so the proposed housing requirement proposed by the Council would fall short of the aspirational but reasonable target which in turn would not deliver a sufficiently ambitious economic growth strategy.

2.20 Despite proposals in the draft national policy revisions to water down the requirement for Councils' development plans to meet their LHN, these remain only in draft form and so no weight can be placed on these changes. The onus is still on authorities to explain why they have departed from their LHN figures.

2.21 We do not consider the Council have provided sufficient justification to warrant a reduction and deviation from the standard method. It is therefore considered appropriate to proceed on the basis that the Council should seek to meet their LHN, as a minimum, up to 2038.

Representations

3.0 Part 2: Policy NC3- Provision of Affordable Housing

3.1 The authority has a high degree of affordable housing need. The baseline evidence found within the Strategic Housing Market Assessment 2018 indicates that the affordability of housing has worsened for those on low income households as a result of an expanding population, the availability mortgage credit and equity loans and - to a lesser extent - rising incomes has driven price rises. Using the simple multiple that house prices are affordable at 4 times gross household earnings, SHMA data suggests that 61 per cent of those who do not currently own housing are unable to afford lower quartile prices.

3.2 From the modelling work, the level of affordable housing shortfall that should be supplied annually in Sheffield is 902 units per annum. This figure represents the required level of new affordable supply that would be required if the backlog is to be cleared over 5 years.

3.3 Whilst it is recognised that market housing schemes are not the only mechanism for delivering affordable housing it is unlikely that the proposed housing requirement will be able to meet this need and stem the increase in the significant shortfall. This lends greater weight to the identification of a higher housing requirement which is consistent with the NPPG and the LHN figure.

3.4 Furthermore, affordable housing provision is unlikely to come forward in sufficient quantity based on the proposed allocated sites as there are significant risks associated with delivery and viability issues relating to anticipated abnormal costs of developing brownfield sites within urban and central areas. Therefore, to reduce the viability burden it is invariably the case that the developer in these developments will seek to negotiate a reduction in affordable housing provision which would undermine a key priority for draft Local Plan.

Representations

4.0 Part 1: Policy H1 Criterion e.) Spatial Distribution - Scale and Supply of New Housing

Sheffield Housing and Economic Land Availability Assessment (HELAA 2022)

4.1 At paragraph 67 of the Framework, local authorities are encouraged to prepare a Strategic Housing Land Availability Assessment to '*identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability*'. To be considered developable, sites should be in a suitable location for housing development, and there should be a reasonable prospect that the site will be available for and could be developed at the point envisaged.

4.2 In terms of overall site identification, it is unclear how sites have been included within the initial assessment. We note at Table 2 the assessment outlines the range and types of sites that have been considered however we question the vetting process as many of these sites may not necessarily have been actively promoted as development opportunities and if this is the case they could not be considered as being reasonably available.

4.3 From paragraph 3.13 the most recent assessment captures *all* the sites that have been promoted since the first 'Call for Sites' that took place in 2009 but there may have been changes in circumstances in terms of whether some of these are still available. We also note from Table 2 that it includes '*internal site suggestions from various officers from their general knowledge of Sheffield*'. Against this background we would suggest that sites may have been included within the HELAA that are not being actively promoted and little weight has been given within the assessment as to whether these sites would be available and economic viable which is critical point when determining potential sites for allocations.

4.4 We note that within the HELAA there is an aversion to assessing potential development sites that are currently designated as Green Belt. This approach is unhelpful as in our view Green Belt sites will be required in order to deliver both the housing and employment requirement and so these opportunities should be considered as early as possible within the evidence based work. There is no reason why the Council should be so precious about assessing Green Belt sites through the HELAA as it is simply a database of available land from which the most suitable and deliverable sites can be selected to meet future development needs. This aspect should be reconsidered as part of the next review of the HELAA.

Representations

Windfall provision

4.5 Of the identified housing land supply set out in Table 1 of the draft Plan and Table 19 of the HELAA, over 22.7% is made up of windfall provision which is a significant proportion and conflicts with the certainty associated with adopting a plan led approach.

4.6 It is accepted that housing supply will continue to generate small windfall site opportunities, but it is unclear whether the Working Group mentioned in the HELAA has reconvened to sanction the assumed allowance of 200 new homes per annum.

4.7 We do not consider an allowance for large windfall sites should be included as no compelling case has been made by the Council as required by paragraph 71 of the NPPF. Given a thorough 'Call for Sites' process has taken place we consider that the HELAA process has already identified and accounted for these sites as part of the Local Plan allocations process. For the purposes of assessing the supply in Table 19 we recommend that the figure of 4,675 dwellings should be reduced to zero. We believe this category of site should not be relied upon through the plan making process to make up the likely deficit.

Housing Land Supply

4.8 A key issue in determining the soundness of the plan is whether adequate supply for new housing is provided and this is a key issue at the heart of the need for considering Green Belt release.

4.9 As the evidence stands, we consider that both the capacity assessment of the central area and the HELAA presents over ambitious and inflated assumptions regarding the amount of housing supply that could reasonably be delivered from these sources. Both documents seemed to suggest that there is sufficient supply available to deliver the Council's somewhat conservative target requirement of 35,530 new homes over the plan period (substantial below the standard method LHN figure), but we seriously doubt whether this is the case as many sites will not fall within the category of developable land.

Representations

4.10 The Council have not demonstrated that its housing land supply has sufficient flexibility to demonstrate it represents a deliverable, viable and robust land supply and will deliver balanced and inclusive growth, thereby achieving an appropriate overall spatial strategy. In light of this and the need to ensure the Green Belt boundary can endure beyond the plan period it is necessary to identify additional new sites across the city-region, over and above those in the existing land supply. Having considered a number of spatial options we do not think the Council have chosen the right approach and instead we conclude that in order to achieve a sustainable pattern of growth for the City, it is necessary to remove some land from the Green Belt and to allocate this land within this Plan for residential development.

4.11 In addition, the plan assumes no degree of headroom between the need figure and the capacity of the sites that will need to be allocated to meet the need. In our view there needs to be enough headroom to ensure that the plan remains robust in the event that there is slippage in the delivery of housing from the allocated or committed sites. This approach is important in a number of ways particularly if the Council are keen to focus on the ability of bringing forward difficult and complex regeneration brownfield sites that may take longer to deliver than anticipated.

4.12 If the plan fails to provide a sufficient level of headroom, we consider that this would pose a risk to achieving local economic prospects and would not adequately address housing affordability or the availability of affordable housing. It would also potentially increase the rate of commuting and would be inconsistent with the assessed housing need of adjoining authorities such as Rotherham which lies within the same housing market area.

4.13 Interestingly within the Employment Land Review 2021, Litchfield's advocate the introduction of a 'safety margin' when planning for employment allocations to allow some flexibility of provision to take into consideration such factors as delays of some sites coming forward for development. At paragraph 6.75 of the ELR it states:

'This margin, or flexibility factor, is a contingency adjustment, providing a modest additional land buffer so that supply is not too tightly matched to estimated demand, and so that shortages of land do not arise if future demand turns out to be greater than the forecasts. Such flexibility is sensible given the uncertainties in the forecasting process and the scope for delays in developing employment space.'

Representations

4.14 There needs to be some recognition and an allowance in the plan that a similar approach should apply to the housing growth strategy to reflect the growth ambitions of the City and introduce sound contingency measures. Adopting this principle becomes even more important as the Council are aiming to achieve a level of housing growth that is substantial below the standard method figure.

4.15 Factoring in an appropriate headroom is in accordance with the NPPF which says that plan should have sufficient flexibility to adapt to rapid change and we would support this approach particularly through the allocation of a variety of deliverable sites in sustainable locations that accord with the settlement growth distribution of the city.

Proposed Housing Spatial Strategy

4.16 The Publication Draft Sheffield Plan is ambitious for the city centre and redeveloping brownfield sites. It proposes c.18,465 new homes over the plan period in the City Centre comprising c.51% of the total proposed housing supply and 56% of the proposed housing allocations.

4.17 The latest data in the HELAA 2022 shows that the City Centre delivered 56% (996 dwellings) of the city's gross dwelling completions. If the Council can maintain that level of delivery every year of the plan period then, in theory, they will achieve the desired numbers. However, of the 996 completions in 2020/21, only 7 were 'houses', the rest were apartments and student clusters. Housing delivery in the city centre will need to diversify if it is to meet the city's housing need but we question whether this objective will be achieved.

4.18 We can see the attraction for the Council seeking to encourage intensification of development within the central and urban areas to try and reduce the pressure on Green Belt locations. However, we are not convinced there is a sufficient and robust body of evidence available to demonstrate that there would be the quantum of developable sites available to achieve the level of yield that would be required to deliver this option. It is therefore unrealistic to assume that all the housing requirements can be delivered from the proposed supply of sites allocated within both the central sub area and the other urban area of the city.

Representations

4.19 There also needs to be a note of caution as previously Sheffield has suffered from an oversupply of apartments and continuing this strategy again would run the risk of not providing a sufficient diverse choice of homes which would run contrary to the evidence found within the SHMA and surveys undertaken by Ipsos MORI and Place Alliance about current attitudes to housing. In addition, by focusing on achieving high density schemes this would reduce the range and mix of housing which would in turn contribute to stifling the economic growth of Sheffield.

4.20 Indeed, people wanting semi-detached and detached housing are likely to move to other parts of the City Region. This type of housing is preferred by professionals and families, and by constraining the choice, Sheffield risks alienating these groups from residing in the authority which would lead to increased levels of commuting and congestion on the highway network.

4.21 Within the city centre there is a significant number of competing land uses and there needs to be a realisation that in many cases commercial land value will eclipse residential value. In those cases where there may be more competition between commercial and residential this may lead to the loss of existing employment premises and so reduce the amount of land available which would directly impact on supporting a stronger economy.

4.22 Land assembly issues where central sites are in multiple ownership and the cost of remodelling and regeneration of areas is likely to lead to potential delays in delivery are also factors to consider together with certain sites not being feasible without public sector support.

4.23 These potential sites will require the most significant public sector support and investment to enable their development, perhaps requiring the Council to compulsorily purchase land, relocate businesses, invest in large infrastructure programs and assemble sites ready for development. This is a large undertaking and looking at Local Authorities such as Erewash and Broxtowe that restricted Green Belt release in favour of urban regeneration, there are considerable delivery and viability issues with those Local Plans.

4.24 This strategy will only allow a limited number of developers to deliver apartments and high-density style homes, thus restricting the market operators and overall housing choice to future citizens of Sheffield.

Representations

4.25 Based on the evidence we are not convinced the target figure suggested by the Council within the central and urban area is realistic and achievable. It therefore becomes imperative that the Council consider selective Green Belt release that are in sustainable locations and can demonstrate having limited harm on the openness and purposes of Green Belt as part of an integrated approach to achieving their future employment and housing growth.

4.26 The Council should accept there are exceptional circumstances to warrant the release of Green Belt meet housing need and with it the opportunity to enable more family sized housing than would be delivered in the central area. This would lower the risk of people wanting more space and larger family homes moving out of Sheffield.

4.27 Whilst this alternative approach would mean more new homes on the edge of the City as well planned urban extensions, we accept that these would still need to be in the most accessible locations and where it would cause the least harm to the environment and the Green Belt. This approach should be undertaken as part of a revised site selection methodology and be guided by how a site performs against the Green Belt Review Assessment.

Conclusions

4.28 In conclusion, we consider there is not a sufficient and compelling level of evidence to suggest that both the central area and urban area can support the amount and type of housing growth requirement. We would therefore suggest that consideration be given to more realistic target levels within the central and urban areas. The transferred balance of the requirement would then be weighted towards the release of well-planned large and small Green Belt sites that are situated either in very sustainable locations or alternatively these sites have the prospect of achieving an increased level of sustainability through the delivery of associated support infrastructure.

Representations

5.0 Part 1: Policy SA9 - Chapeltown/High Green Sub-Area

5.1 In the SHMA, Chapeltown is noted as having an under-supply of smaller properties for newly forming households and larger properties to retain families and professionals that out-migrate from Sheffield to find larger homes. The lack of new housing in Chapeltown due to a tight Green Belt boundary is exacerbating these issues and further supports the need for Green Belt release in sustainable locations near key transport hubs, such as within 1.2km of train stations.

5.2 We accept that in order to deliver the required housing numbers in the right location proximity to public transport will be one of the key considerations. Chapeltown is located on a key transport corridor, has a train station and is one of three 'Principal Towns' in the Sheffield settlement hierarchy. It is, therefore, a sustainable settlement capable of accommodating a larger portion of growth. This supports the allocation of the Warren Lane site to meet both housing and employment needs in a sustainable location.

5.3 This alternative spatial approach would also support the following aims of the plan:

- The potential to deliver more affordable housing;
- offers opportunities to provide new quality open spaces allowing better access to green infrastructure and associated health benefits
- It would provide an opportunity to deliver sites such as at Warren Lane that would provide convenient access to employment areas outside the city centre;

5.4 It is considered that the only realistic way the Council can hope to increase the delivery of housing is to release suitable unconstrained Green Belt sites. As such a selected number of well planned urban extension sites around the built up area of Sheffield that relate to the existing hierarchy of settlements that would not unduly harm the purposes of Green Belt would make an important contribution to achieving this objective. The Chapeltown Sub Area should be considered as part of this alternative spatial approach.

Representations

6.0 Part 1: Policy H1 Criterion g.): Range of New Housing - Scale and Supply of New Housing

6.1 The economic opportunities and quality of life that Sheffield can offer make it an attractive place for people to move to. This not only includes younger adults drawn by the universities, graduate jobs and lifestyle offer but also families attracted by the long-term prospects for their children, and older people wanting to take advantage of the wide range of cultural and leisure facilities.

6.2 Following the implications of COVID-19, the types of homes needed has changed with more demand for private gardens, extra workspace and access to local green spaces. A study by Ipsos MORI for St. Modwen released in 2020 found the experience of living through lockdown changed peoples 'wish list' for their housing and the areas they live in. The study is based on 2482 interviews with UK residents aged 16 – 75. It confirms that people are more likely to consider a private garden as important and proximity to green spaces are rated positively by most people thinking about their local area.

6.3 The survey also reveals there is a stronger preference for living away from city or town centres but there are marked generational differences with younger cohorts favouring being based in cities /towns.

6.4 A survey undertaken by the Place Alliance released in October 2020 entitled Home Comforts summarised the findings of a national survey of 2,500 households (representing 7,200 people). The intention was to understand what can be learnt from the pandemic on our home environments. The findings offer insights into how we should be designing houses in the future in order that they are more resilient and better able to support healthy lifestyles. The key elements of the research concluded:

- Houses are more comfortable than flats: Those living in houses (of any type) were more comfortable than those living in apartments, with those living in mid-(5-10 storey) or high-rise blocks (over 11 stories) being the least comfortable of all.
- Access to private open space is critical: Access to private open space from the home was the strongest design-based predictor of comfort. Households with a private garden or terrace space were the most comfortable, followed by those

Representations

with a private balcony or shared garden. Households with no access to any sort of private open space were least comfortable.

- High-rise comes out poorly: Neighbourhoods composing houses (whether detached, semidetached or terraced) score markedly better than those with apartment blocks, particularly those with high rise blocks.
- Building higher means less community: Apartment blocks have a much weaker sense of community than houses and the sense of community reduces the higher blocks become.
- Higher, newer and social come off worse: Residents in high rises, post-2010 homes, and local authority owned developments experienced the smallest boost in community feeling.

6.5 These views support a survey undertaken as part of the SHMA 2018 where householder preferences and aspirations were assessed, and it revealed a clear preference for detached and semi-detached housing. The table below summarises evidence of demand for properties of different types, sizes, tenure and locations that can be found in the SMHA at table 8.1:

Dwelling type profile	current profile %	profile of new demand %
flats /apartments	25	20
terrace	29	18
semi detached	32	35
detached	12	28

Source: SHMA Household survey 2018

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6.6 Whilst the figures in table 8.1 acknowledge that the data is an indication of unconstrained preferences and should be taken as a guide only, they clearly provide clear evidence of the differences between the current and preferred demand by households. There is a move away from flat and apartment living to a preference in demand for more semi detached and detached houses.

6.7 This information should be seen in the context of the preferred spatial strategy of the Council which seek to focus on the potential development opportunities that may come forward within the Sheffield city centre. Evidence found within the SHMA at paragraph 4.55 confirms that 94% all the properties in this area are flats and these are likely to continue to be the most common types of housing developments on future city centre sites.

6.8 It is therefore reasonable to conclude that a plan strategy that focuses a significant element of the housing requirement in the city centre area would create an untenable mismatch and imbalance between the demands and preferences of the housing market and the potential limited range of products that could be offered arising from the character of the supply of land available if the wrong strategy is taken.

Representations

7.0 Part 2: Section 5 - A Strong Economy

- 7.1 In terms of the key aims, we would not quarrel with ensuring that there is a strong economy across the city with strong transport connectivity between communities and commercial areas. However, it is also important to secure successful commercial markets for a wide range of sectors and the size and locations of these requirements need to take full account of relevant market and economic signals and so a more positive and ambitious approach to this objective is required. These issues are explored in more detail in our objections to the economic elements of draft Policies SP1 and SP2 in Part 1 of the Local Plan.

Representations

8.0 Part 1: Policy SP1 (Criterion b) - Employment Land Requirements

Employment Need

- 8.1 Policy SP1 criterion b.) makes reference to the provision of 12.9 ha of employment land per year which includes 2.9 hectares for office development; and 10 hectares for industrial development. We consider that this level of requirement is insufficient to deliver the key objective of achieving a stronger economy as outlined in the plan.
- 8.2 A number of key drivers and macro trends are likely to influence the type, scale and location of requirements for employment space in the city over the plan. It is therefore important that the Council responds to these changing preferences to ensure that the business needs can be met with in Sheffield.
- 8.3 In terms of reviewing employment requirement consideration should also be given to the Employment Land Review 2021 (ELR), the Employment Land Need and Supply Technical Note and the Sheffield Economic Plan (SEP) prepared by the SCR.
- 8.4 The ELR modelled eight different economic scenarios focusing on Labour demand, Labour supply and past take it rates and the figures ranged from a requirement of between 176ha to 242 ha during the period 2018 and 2038.
- 8.5 The commercial market analysis undertaken as part of the ELR has concluded that there is a shortage of employment land available for development in the short to medium term, with those consulted stating that there is an over-supply of poorer quality, older industrial stock in particular which gives a misleading impression when vacancy rates and availability levels are analysed. As a consequence, the City has missed out on several very large enquiries for industrial / warehousing land in the past
- 8.6 The current rapid growth seen in e-commerce (which is not reflected in the historical record or Experian job growth projections to the fullest extent), combined with increased 'on-shoring' has driven demand in the industrial and logistics market across 2020 and is affecting Sheffield City just as it is impacting on most of the larger cities across the UK.

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- 8.7 This growth in demand represents an excellent opportunity for Sheffield; however, the lack of land available for industrial development, both for inward investment but also for more modest smaller industrial units in the short to medium term will lead to the City being unable to capitalise on this opportunity, and as a result lead to a further loss of potential occupiers to competing areas.
- 8.8 Evidence from agents in the ELR noted that the lack of appropriate stock is causing many firms to instead locate into other less desirable areas such as Doncaster, Rotherham and Barnsley. The City risks missing big opportunities from the sector in the near future, as whilst the offer is ideal with good transport links, availability of skills and a wider leisure offer for workers, no specific land requirement or sites feature in the Local Plan and we object to this approach.
- 8.9 The Logics Study prepared by Iceni and commissioned by the Council was released in December 2022. This study identifies a Class B8 need of between 69.6 – 86.8 ha with a mid point of 78.2 ha. The report recommends that Sheffield should plan for this amount to make a meaningful contribution within the South Yorkshire property market in line with its own forecast need. Even with the possibility of factoring existing sites being potentially recycled for logistic requirements the consultants of the report confirm it would only modestly reduce the requirement to 62.6Ha or 3.7ha per year.
- 8.10 Turning to Sheffield's supply position, Iceni has assessed sites for large scale logistics resulting in a potential 22.3 ha – 84.2 ha of available land. However, it is acknowledged that much of this identified supply is reserved for manufacturing activities, as many of these parcels of land are in manufacturing priority locations. Overall, based on the recommended need of 62.6 ha (assuming a contribution from recycled sites as above) and the supply is 22.3 ha there will be a deficit in provision. However, the Council have no intention of meeting the longer term logistics needs for its own area, which will result in further constraints on business activity as confirmed by their consultant. We consider that this approach will make the plan unsound.
- 8.11 The selection of the employment land requirement should align with the Council's economic aspirations and housing targets which in our view should be more ambitious than the Local Housing Need figure to reflect the jobs growth target set out within the SEP and the status of Sheffield as an important city having the capacity and opportunity to drive the local and regional economy forward as part of the levelling up agenda for the north of England.

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- 8.12 Against the recommendation set out within the ELR, the Sheffield Plan figure of 12.9 Ha per annum is not very ambitious and it ignores an allowance to cater for the logistics sector against the advice of their consultants. We recommend it should increase to a figure more towards the upper end of the range of the eight scenarios tested and suggest a requirement figure of 242 hectares over the plan period which would be reasonable and achievable.

Employment Supply

- 8.13 In terms of the quantitative supply, the 2021 ELR reviewed a range of sites to assess their suitability for employment use. Having regard to sustainability, market attractiveness and policy adherence it was considered that 67 were suitable for employment and comprised 197.17 hectares. However, 10 of the 67 sites are likely to include an element of non-employment uses, relating to 28.16 ha. Therefore, the Council's employment land portfolio could comprise up to 169.01 ha, plus a further 28.16 ha of sites that are likely to contain an element of office, industrial and warehousing land.
- 8.14 The draft Local Plan at paragraph 3.8 refers to existing planning permissions and proposed site allocations identified in the plan which would provide 171.42 hectares of employment land. Although it is not clear, we assume that the different and reduction in supply between the ELR and the figure within the draft Local Plan is because the Council have decided to transfer land previously earmarked for employment and instead allocated it for other uses such as housing to avoid development on Green Belt land. Paragraph 6.8 of the HELAA seem to confirm this approach by making the assumption that 4.23 hectares of employment land per year (or 71.91 ha over the plan period) will be developed for housing and other non office, business or industrial uses.
- 8.15 However, the implication of adopting this approach is that based on the Council's employment need figure this will reduce the supply and represent a shortfall of 47.88 Ha which will not be sufficient to support the economy strategy in the Plan. Indeed, we think the need figure of 242 ha at the upper end of the recommended range found in the ELR should be adopted which would further increase the shortfall in the emerging Plan to 70.58Ha.

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- 8.16 Whilst the Council may wish to claim that further potential sites may come forward from windfall opportunities to add to future economic land supply, no compelling evidence of this category of potential site has been provided.
- 8.17 Furthermore, the demand /supply analysis within the ELR assumes that the authority's undeveloped employment allocations come forward in their entirety for employment development over the plan period, and that all extant employment land planning permissions will be developed which will not be the case due a wide range of reasons.
- 8.18 Any significant deviation from this broad assumption would have an impact upon the overall balance resulting in an increase in the shortfall. There will be insufficient 'churn' of economic land within the city and no flexibility across the city region to ensure that demand can be met throughout the plan period.
- 8.19 In addition, based on an assessment of the proposed employment allocations these do not offer a sufficiently wide range of provision to address qualitative factors. Additional land is therefore required for qualitative reasons, in order to:
- Improve the choice of provision for occupiers;
 - Meet gaps in the supply of particular types of premises;
 - Improve or modernise the quality of current provision and so help attract more occupiers; and/or,
 - Provide a better spatial distribution of employment sites to meet the needs of different settlements.
- 8.20 Based on this assessment we consider that further employments need to be allocated. It is therefore requested that the Council identifies and allocates additional sites that are considered to be suitable and deliverable for B Class employment uses. Any new sites should be sustainable and, ideally, located within areas of strong market demand.

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8.21 Policy SP1 makes no provision for large scale B8 uses which we object to. Given the scale and urgency of the 'Big Box' logistics e-commerce issue nationwide, the Council should give consideration to the opportunity arises to quantify and provide for large-scale strategic B8 in their area and identify specific sites where this need should be allocated. This approach was specifically recommended in the ELR and also by the consultants who prepared the Logistics Study.

Representations

9.0 Part 1: Policy SP 2: Spatial Strategy for Employment

- 9.1 We are aware that a high level city region wide Strategic Employment Land Appraisal (SELA) (May 2020) has examined the need for the supply of employment land across the SCR. This is in line with guidance to work with planning authorities in a Functional Economic Market Area (FEMA) when assessing the need for land in the context of the duty to cooperate.
- 9.2 A key recommendation in the SELA is for local planning authorities to work together on a collaborative strategy to steer footloose uses search as logistics and distribution uses to the most optimum locations. However, the SEA recognise that Sheffield is well positioned within the M1 corridor, and this strong North-South highly accessible link should be considered as part of this process for locating these types of uses as it is an inherent strength and opportunity of the city which should be exploited rather than rely on other opportunities emerging elsewhere within the region.
- 9.3 Therefore, Sheffield is considered to be the prime industrial market within the South Yorkshire region and the ELR suggests there is a limited supply of suitable sites along the M1 corridor between junctions 33-34. The ELR has also identified that commercial agents consider there is a need for additional level sites to the east of Sheffield close to the motorway.
- 9.4 In terms of the different types of industrial and logistics space which need to be provided in the future, it will be important for Sheffield to maintain an appropriate mix of sites in key locations in order to attract higher end occupiers and still retain its core indigenous employment base.
- 9.5 When considering the distribution and character of economic growth across Sheffield, the spatial strategy relates to nine sub areas that feature in Policy SP2 and these need to have more regard to the market in terms of locational requirement for different types of businesses.

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- 9.6 Policy SP1 at criterion d.) confirms that the priority locations for economic growth are proposed within the Central Sub-Area, and the Advanced Manufacturing Innovation District (AMID) to help meet the objectives of the South Yorkshire Mayor Combined Authority Strategic Economic Plan (SYMCA SEP). However, we consider the Plan should also recognise the commercial locational value associated with other sub areas that have a strong relationship to the strategic transport network including the Chapeltown/High Green Sub-Area.
- 9.7 In terms of future growth potential for Sheffield, we consider that the site at Warren Lane has excellent connectivity to the M1 corridor at J35A and also provides access to Manchester via A616/628 Woodhead Pass. There is ready access to the labour market being close to Chapeltown and the existing employment uses in the area. Therefore, part of this site amounting to approximately 8.5 Ha (21 acres) to deliver approximately 28,000 sq m (300,000 sq ft) of commercial and presents a good opportunity for economic development combined with a housing scheme on the remainder of the site that has been promoted through the 'Call for Sites' process immediately adjacent to this parcel in the south. This would create a truly mixed use sustainable form of development that would meet the aims and objectives of the emerging plan.
- 9.8 In summary, the proposed Spatial Strategy does not allow for a sustainable pattern of development to be able to grow the economy. The location of proposed employment allocations in the Plan do not reflect the requirements of future businesses which will be influenced by site opportunities that have excellent connectivity to the strategic transport network.
- 9.9 Based on the Council's proposed spatial distribution of growth within the both the City and this sub area we consider their approach does not maximise the economic growth opportunity. As an alternative, we contend that within the Chapeltown/High Green Sub-Area an employment allocation at Warren Lane represents a good opportunity for economic development as it would create a truly first class business opportunity that would directly satisfy and capture the demands of the anticipated future commercial market as well as meet the aims and objectives of the emerging plan.

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10.0 Part 1: Policy SP1 Protection of Green Belt

- 10.1 Criterion h.) of draft Policy SP 1 confirms the protection for existing Green Belt boundaries around existing built-up areas, with one strategic land releases on a predominantly brownfield site at the former Norton Aerodrome (for residential use).
- 10.2 The draft plan avoids addressing the relationship between finding suitable employment locations and sites to support economic growth and demonstrating exceptional circumstances before making changes to the Green Belt.
- 10.3 Based on the evidence found within the ELR and the Logistic Study, we consider the Council have wrongly conclude that there is an adequate supply and quality of employment land available without requiring the need to release Green Belt land. We take an opposing view and suggest that based on the envisaged level of growth required during the plan period; the limited availability of sites to accommodate this need on brownfield site; and the locational requirements of the different economic sectors, there are significant grounds to confirm that exceptional circumstance exist to warrant the release of Green Belt land to deliver the economic objectives of the plan.
- 10.4 We are aware that the proposed draft changes to the NPPF at paragraph 142 states as follows:
- 'Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Green Belt boundaries are not required to be reviewed and altered if this would be the only means of meeting the objectively assessed need for housing over the plan period.'
- 10.5 Given its draft status no weight can be given to this proposed policy change. However, it should be appreciated that this proposed change is specifically directed at meeting the objective assessment needs for housing and therefore it does not apply to meeting the objective assessment needs of employment provision in a local authority's area. This is an important distinguish that should be recognised in the Council's plan preparation process and allows them to release land from Green Belt for employment purposes where exceptional circumstances can be demonstrated which in Sheffield's case these exist.

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10.6 For housing, the future development needs can only be met through allocations of land both within urban areas and through the release of Green Belt and the exceptional circumstances include:

- The need to meet the need for housing land arising during the emerging plan period;
- There is insufficient capacity within urban areas and outside of Green Belt to accommodate the objectively assessed needs of the City; and
- Promoting sustainable patterns of development across the district through Green Belt releases.

10.7 We also object to the draft Plan as no attempt has been made to consider the long term development needs for housing and employment to ensure that the Green Belt boundary lasts beyond the Plan Period. The National Planning Policy Framework sets out national planning policy on safeguarded land at paragraph 143. It describes safeguarded land as areas between the urban area and the Green Belt which may be required to meet longer-term development needs stretching well beyond the plan period.

10.8 Paragraph 143 goes on to set out that local plans should be clear that safeguarded land is not allocated for development at the present time and that planning permission for the permanent development of this land should only be granted following an update to a plan which proposes development.

10.9 It is accepted that the National Planning Policy Framework does not require that local plans identify areas of safeguarded land but that they do so 'where necessary'. We consider that it is necessary to identify safeguarded land in Sheffield in the Plan. Point e) of paragraph 143, states when defining Green Belt boundaries in a local plan planning authorities should be able to demonstrate that these boundaries will not need to be altered at the end of the plan period. It is unlikely that this could be achieved in Sheffield without ensuring safeguarded land is identified. This is because the vast majority of land outside of the urban boundaries is Green Belt land. It is unlikely that at the end of the plan period in 2039 adequate amounts of land could be identified that can satisfy development needs within the plan settlement boundaries proposed for the Plan.

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10.10 We consider the principle of safeguarded land should be identified in the Plan of an adequate amount to ensure that Green Belt boundaries should not need to be altered in the long term.

Representations

11.0 Part 1: Policy SP1 Major New Transport Infrastructure

- 11.1 Criterion j.) of draft Policy SP1 identifies major new transport infrastructure, including: local rail upgrades, including to the Hope Valley Line and Barrow Hill Line. In addition to these upgrades we consider that to improve the key mass transit transport corridors for providing fast direct public transport services from the suburbs to the central area we recommend that using the existing railway line between Meadowhall and Chapeltown as an extension to the tramline to facilitate a potential extension of employment areas for AMID in this direction should also be considered through the Plan process.
- 11.2 Development along this transport corridors would increase the prospects of creating key pieces of infrastructure that would be more viability as a result of increasing the population and businesses in the catchment areas of the existing Chapeltown Station.
- 11.3 It is also important to consider this proposed transport initiative in the context of ensuring that AMID is equipped with better and more improved transport connectivity as this will enable accelerated growth as well as improved levels of sustainability and reduced highway congestion through providing modal choice.

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12.0 Evidence Demonstrating the Suitability and Deliverability of Site HELAA REF Nos S03112, S03113 and S03312)

12.1 The site my client is promoting extends to approximately 16.77 hectares and is currently in agricultural use. The site relates well to the existing urban area, with commercial units off Brookdale Road to the west and to the south west lies existing housing which front onto Warren Lane. In terms of the other site boundaries, to the north and east lies the M1 motorway and junction 35A spur road together with a roundabout. All these features visually create an urban fringe character to the site which is well contained and detached from the wider countryside setting to the north and east.

12.2 The site lends itself to be divided into 3 separate parcels and below is a site location plan showing the site edged red:

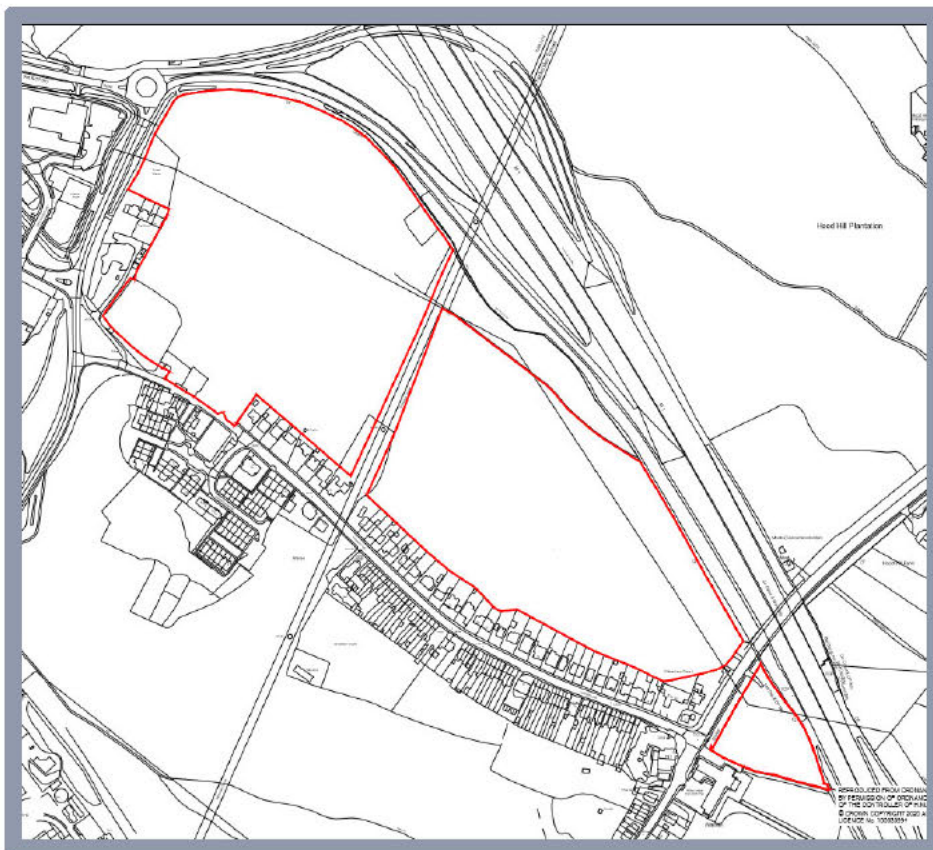


Figure 1: Site Location Plan

Representations

12.3 The northern western portion of the site is strategically well placed with good access ability to Junction 35A of the M1 motorway. We consider that this area of the site would be appropriate for commercial / business related uses with a direct access from Thorncliffe Road and would extend to approximately 8.67 hectares in size. The south eastern boundary of the commercial area would be formed by the strip of land that relates to the Tankersley railway tunnel running in a north easterly direction under the site at this point that will form a buffer.

12.4 The middle portion of the site relates well to the existing residential properties and services situated along Warren Street and so would lend itself to residential development and a new access arrangement could be created off White Lane to the South of this parcel.

12.5 The southern portion of the site also relates well to the settlement of Warren as well as being contained by the alignment of the M1 motorway to the east. It provides another residential development opportunity with a proposed means of access directly onto White Lane, the arrangement of which would be coordinated with securing an access into the middle portion of the site. Both these proposed residential parcels of land would amount to 8.1 hectares in size and would have the capacity to accommodate circa 220 dwellings.

12.6 Warren Lane is served by a number of services including two pubs and a Methodist Chapel. The site also relates closely to Chapeltown and from its southern portion the district centre of the town is approximately one kilometre easy walking distance via White Lane. The district centre not only provides a full range of services and facilities, but also has a local train station which is 1.2km from the site. There are two train services running daily that serve Chapeltown and these are Leeds to Nottingham via Castleford and Huddersfield to Sheffield on the Penistone line.

12.7 The southern portion of the site is also well served by existing bus routes travelling alone White Lane. Bus Service Number 2 provides an hourly service during the weekdays from Barnsley Interchange to Sheffield city centre. Bus Service M92 provides a service between Harley and Hillsborough Interchange with a frequency of four times during a weekday.

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12.8 In summary, we consider that the site performs well in sustainability terms in terms of being conveniently situated to a wide range of services and facilities and is accessible via other means of transport other than the private car. As discussed below the site has a limited Green Belt function and its removal for a mixed use employment and housing scheme would not materially harm any of the Green Belt purposes. We therefore considered this site is both suitable and available and should be seriously considered as a mixed use development allocation that can deliver the required level of growth over the plan period.

Site Selection Methodology Note January 2023

12.9 Similar to the Green Belt sites not being assessed as part of the HELAA, which we have objected to elsewhere in our representations, the Site Selection Methodology Note confirms at paragraph 3.20 that all greenfield/Green Belt sites and non-sustainable brownfield Green Belt sites were excluded from the process at stage 1 of the assessment. Based on our view that Green Belt releases will be required to ensure that Plan can be considered sound, the approach adopted by the Council is too narrow in its assessment of alternative sites particular if an independent Local Plan inspector decides that further consideration should be given to the release of Greenfield Green Belt sites in order to meeting the growth requirements of the City and achieve a Plan that is 'sound'.

12.10 The sources of the sites identified in the Note extend historically to the undeveloped allocations within the UDP. We would question the deliverability of sites that have previously been identified as potential development opportunities but have never been implemented over the last 20 years or so. Only those sites where there is strong evidence to suggest that they are currently being actively pursued and promoted should feature in the site selection process.

Green Belt Review 2020

12.11 In our view it is necessary to remove some land from the Green Belt to meet future development needs and so we welcome the principle of the Green Belt Review.

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- 12.12 Based on our response to Policy SP1 we believe there are insufficient quality of suitable housing and employment sites that can be delivered within the urban area and as such exceptional circumstances to warrant the release of land from Green Belt to accommodate these needs. As such, the review helps identify and target areas that least meet the purposes of including land in the Green Belt as set out in the NPPF.
- 12.13 Details of the Green Belt review methodology are set out within the Green Belt Review September 2020. The first stage of the Green Belt assessment examines and identify how broad parcels of land in the Green Belt perform against the relevant five purposes of Green Belt. The criteria for identifying the broad parcels are set out in Section 5 of the review document and are essentially strategic in nature whilst focusing on the proximity of the settlement hierarchy as previously set out in the Core Strategy.
- 12.14 Whilst the consideration of strategic parcels can be a useful starting point, the smaller resultant Green Belt parcels are of greater significance and value as it is the assessment of these area that could lead to specific sites being released. Indeed, it is recognised that a smaller resultant parcel could have a very different assessment against Green Belt purposes than the 'parent' general area. As part of the sieve process we would suggest that smaller parcels that fall within the common constraints listed in paragraph 6.4 and 6.6 could be excluded from the assessment but if these constraint only form a small part of the parcel or it can be demonstrated through technical work that the impact can be mitigated to a satisfactory level, a judgement should be made rather than automatically ruling out the entire parcel.
- 12.15 Whilst we would agree at a general level that the identification of smaller parcels should reflect the settlement pattern establish within the Core Strategy (which focuses development within the main area of Sheffield and the principal towns,) there should be an allowance made in order to consider potential strategic employment location as there are potentially a wide range of other factors at play (such as transport connectivity to the strategic network, or the relationship to other business as part of achieving a clustering effect) that will determine the suitability of these types of uses.

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- 12.16 We note that there is a strong correlation between the smaller Green Belt parcels and the sites that have been actively promoted by landowners or agents through the Call for Sites process. This is supported as it allows full consideration of their suitability for development which can then be taken in to account as part of the overall site selection methodology if a need to release land from the Green Belt is evidenced.
- 12.17 We support the view that the process of the scoring system of the parcels of land against the purposes of Green Belt is not solely mechanistic and there will be an opportunity to apply sound professional judgement as part of the selection process. Nevertheless, the scoring system provides a useful starting point and we have reviewed our client's site below against the Green Belt purposes and assessment criteria providing our own views and revised score where appropriate.
- 12.18 In addition to scoring the site against the relevant purposes of Green Belt, each small parcel was assessed to ascertain how robust the new Green Belt boundary would be if it was removed from Green Belt, and this was compared to the relative strength of the current boundary. However, whilst this assessment has been quantified, unlike the scoring methodology for the Green Belt purposes, there is no guide in the review as to how the score should be applied and so this requires further explanation.
- 12.19 In terms of Green Belt purpose one - checking the unrestricted sprawl of large urban areas, we agree that parcels which are well connected to the settlement and are contained by the adjoining built form essentially restricts urban sprawl and consider the assessment satisfactory. However, another important aspect to consider is the strength of the existing boundary in preventing urban sprawl which would not otherwise be prevented by a barrier. The NPPF states that local authorities should define boundaries clearly using physical features which are readily recognisable and likely to be permanent. Highly defensible boundaries would include motorways, main roads, railway lines and natural land formation such as water courses, woodland area and development with strongly established boundaries. Features lacking in durability could comprise development with weak irregular and inconsistent boundaries. A better qualitative and quantitative scoring system to assess existing and proposed boundary parcels should be undertaken which assigns the results to this Green Belt purpose rather than it being a standalone assessment.

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- 12.20 In terms of Green Belt purpose two - preventing neighbouring towns from merging, we suggest that distance between distinct main settlements is too simplistic and a 'scale rule' approach should be avoided. Therefore, in addition to asking the question whether the loss of Green Belt would lead to a significant reduction in distance between settlements, it is also important to consider the visual function and more consideration should be given to the overall visual landscape character having regard to the topography and defensible barriers between existing urban areas as these will influence the impression of whether there is a sensitive gap that requires protection.
- 12.21 In terms of Green Belt purpose three relating to safeguarding the countryside from encroachment, consideration should be given to the sensitivity of landscape quality. In particular whether or not there are national or local landscape designation areas and does the Green Belt area displays semi urban/urban fringe characteristics. If so, we would suggest these parcels would have a low sensitivity to development and should be considered in the scoring process to improve the somewhat crude approach suggested in the Green Belt Review.
- 12.22 In terms of Green Belt purpose four - preserving the setting and special character of historic towns, we would agree with the Council that this purpose should not be assessed as there are no historic towns within the area.
- 12.23 In terms of Green Belt purpose five relating to assisting in urban regeneration by encouraging the recycling of derelict and other urban land, we would take issue with the Council as they have decided to use this as part of their scoring process. The extent to which the Green Belt will support urban regeneration can be difficult to quantify but it is generally recognised that Green Belt should encourage re use of urban land by limiting the availability of land outside the settlement.
- 12.24 We consider that the Council are misinterpreting this purpose of Green Belt through their scoring system. The objective of the purpose is to recycle derelict and other urban land which relates to land *within* an existing settlement boundary and so it does not apply to the re use of previously developed land in the Green Belt that is either adjacent to or remote from existing urban areas. To support our argument we refer to Rotherham Councils detailed Green Belt Review (March 2016) which dismissed this purpose as part of their assessment on the basis that they considered it impossible to judge how any given parcel of land within the Green Belt would contribute to the fulfilment of this purpose

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- 12.25 Furthermore, the Planning Advisory Service published updated guidance for undertaking a review of the Green Belt in February 2015. They confirm that during the plan making process the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land and so the value of land parcels is unlikely to be distinguished by the application of this purpose. We would agree with these view and request that the Council remove this purpose from the scoring process. As part of reviewing Green Belt boundaries in terms of assessing whether changes should be allowed for new employment to be built in exceptional circumstances, consideration should also be given to identify areas of safeguarded land on the edge of settlements to meet the longer term development needs for housing and employment so that Green Belt boundaries last beyond the plan period.
- 12.26 Similar to identifying allocations, we would expect that safeguarded land designations to align closely with the settlement hierarchy and the transport network to reflect the underlying spatial and sustainability objectives of the plan. Within the Green Belt Review document there is no reference to the issue of safeguarded land and so it is unclear as to how the Council intend to deal with the matter, but it is an important consideration to ensure that once reviewed the Green Belt boundary stretches well beyond the plan period.

Detailed Review of Warren Lane, Chapeltown Green Belt Parcel (Ref CN-3-b)

12.27 We have reviewed the relevant parcel against the Green Belt purposes and scoring criteria found within the Council's Green Belt Assessment Methodology. We set out our review as follows:

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Site Name: Warren Lane, White Lane, Chapeltown			
HELAA Ref: S03112/ S03113/ S03312		Green Belt Ref: CN-3-b	
Green Belt Purposes	SCC Score	JEH Planning Comments	JEH Planning Revised Score
Purpose 1: to check the unrestricted sprawl of large built up areas	3	We consider that this parcel adjoins the existing urban area on at least 3/4 of its boundary given its relationship to the houses along Warren Lane and the industrial park immediately to the Northwest	1
Purpose 2: To prevent neighbouring towns merging into one another	3	The most relevant gap is between Chapeltown and Hoyland to the northeast and we have measured this distance at over 2km. In addition, there is undulating topography and significant Woodland areas that reduced the perception of the two settlements from merging in this direction.	1
Purpose 3: To assist in safeguarding the countryside from encroachment	5	The site is detached from the wider open countryside and rural landscape character is influenced by the enclosing urban features. Landscape assets, for example hedgerows, have not been maintained or have been removed resulting in a weakened landscape structure. There are no national or locally designated landscape areas.	3
Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	5	For the reasons given in our representations this purpose of Green Belt should not feature in the assessment.	0
Total Green Belt score	16		5
Robustness of Green Belt boundary	3	The existing Green Belt boundary is poorly defined by garden fences. The M1 motorway boundary would provide a more robust and stronger permanent edge to the urban land uses by utilising an existing physical feature.	Query the LPA's approach to scoring this aspect and recommend it should form part of the purpose 1 assessment.

12.28 Based on the Council's assessment and applying our own score specifically to this site, it is clear that there are strong grounds to justify the removal of these sites as part of the overall Green Belt review as they make a very limited contribution to the five purposes of Green Belt.

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13.0 Conclusions and Key Recommendations

13.1 This is a formal response to the Publication Draft Sheffield Local Plan submitted on behalf of the Fitzwilliam Wentworth Estate specifically in relation to the promotion of three adjoining and related sites known as Site HELAA REF Nos S03112, S03113 and S03312 Warren Lane, White Lane, Chapelton for a mix of employment and housing purposes.

13.2 We have demonstrated that the draft Local Plan does not meet the Government's test of soundness set out within the Framework for the following reasons:

- The proposed housing requirement is too low. Planning at this level will exacerbate the current shortage of land, deepen the housing crisis, fuel affordability problems and constrain economic growth prospects and social mobility. A higher housing requirement is needed. We do not consider the Council have provided sufficient justification to warrant a reduction and deviation from the standard method. It is therefore considered appropriate to proceed on the basis that the Council should seek to meet their LHN of 2,923 homes per annum as a minimum, up to 2038.
- In the Central Sub area the Council are relying on a significant quantum of development to come forward on difficult and challenging sites and the future delivery is uncertain. Additional allocations are therefore required elsewhere to address this deficit.
- The windfall figure is too high as it is reasonable to expect the downward trend of windfall delivery to continue given the plan identifies new allocations.
- A strategy that focuses on increased housing delivery in the Central Sub area risks of not providing a sufficient diverse choice of homes which would run contrary to be evidence found within the SHMA where householder preferences and aspirations were assessed and revealed a clear preference for detached and semi-detached housing. The success of delivering a citywide housing strategy will be dependent upon creating a wide mix of locations and different types of housing across district that seeks to attract and accommodate a wide range of

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housing needs that support the socio and economic dynamics of the city as a whole in a sustainable manner.

- The proposed distribution of the proposed housing and employment requirement to Chapeltown is too low in the context of this settlement being a main town offering a sustainable pattern of development with a wide range of facilities and a rail link.
- To reflect a more jobs led growth scenario target and to fulfil the aspirations of Sheffield in its potential to become a major economic city within the North of England, a proposed employment requirement of 170 hectares over the plan period is too low. This should increase to at least 240 hectares as recommended within the ELR. We recommend this higher provision should be allocated to ensure that there are a sufficient range and choice of sites available so that the availability of employment land does not unduly stifle Sheffield's ability to achieving its growth potential.
- The Council have no intention of meeting the longer term logistics needs for its own area, which will result in further constraints on business activity as confirmed by their consultant who prepared the logistic study
- The Council need to focus and commit to the alternative approach of selectively releasing Green Belt land for development which would involve choosing the most sustainable locations as well as having the least harmful impact on the

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purposes of Green Belt. Without considering the release of Green Belt sites to satisfy the employment need then the draft Plan should be considered unsound.

- Contrary to the Council's view, the future development needs can only be met through allocations of land both within urban areas and through the release of Green Belt. The exceptional circumstances include:
 - The need to meet the need for both housing and employment land arising during the emerging plan period;
 - There is insufficient capacity within urban areas and outside of Green Belt to accommodate the objectively assessed needs of the City; and
 - Promoting sustainable patterns of development across the district through Green Belt releases.

13.3 In terms of the promotion of Sites Ref Nos S03112, S03113 and S03312 our representations have demonstrated that:

- FWE are fully committed to promoting and delivering them.
- The location and size of the sites sit well within the distribution of growth in terms achieving their economic and housing strategy whilst achieving a sustainable pattern of growth.
- The three sites make no material contribution to the purposes of Green Belt in terms of preventing settlements from merging, checking unrestricted urban sprawl and safeguarding the countryside from encroachment as the physical characteristics of the site (included its topography and vegetation and road network) act as defensible boundaries disconnecting them visually from the surrounding areas of countryside.
- If for whatever reason the Council chose not to identify these sites for either employment or housing purposes, then as an alternative they should be released from Green Belt and designated as Safeguarded Land to continue to reflect a sustainable pattern of development beyond the plan period.