

From: [REDACTED]
To: [REDACTED]
Subject: RE: Yk6978PS objection to Local plan Policies SP1, SP2, H1 and omission site
Date: 20 February 2023 17:35:29
Attachments: [image001.png](#)
[SCC Reg 19 Consultation Form - Parts A and B Land at Oakes Park.pdf](#)
[SCC Reg 19 Consultation Form - Parts A and B Land at Broomfield Lane.pdf](#)
[02.18.MW.YK6978PS.Land at Broomfield Lane and Oakes Park Site Specific SP1 SP2 obo Hallam Land Management.pdf](#)

Please find attached our objection and associated forms for a site at Oakes Park and at Broomfield Land

Roland G Bolton BSc (Hons) MRTPI
Senior Director
Strategic Planning Research Unit
DLP Planning Limited
Ground Floor
V1 – Velocity
2 Tenter Street
Sheffield
S1 4BY

[REDACTED]
email: [REDACTED]
www.dlpconsultants.co.uk



DLP Planning Limited is a limited company registered in England and Wales. Registered number: 2604863, Registered office: 4 Abbey Court, Priory Business Park, Bedford MK44 3WH and is part of DLP (Consulting Group) Limited. Registered number: 3161011.

Please note that the DLP (Consulting Group) Limited and its operating companies may monitor email traffic data and also the content of emails for the purposes of security. This email is confidential and may contain privileged information. It is intended only for use of the intended recipient. If you received it by mistake, please notify the author by replying to this email or telephone (01234 832 740). If you are not the intended recipient, you must not print, copy, amend, distribute or disclose it to anyone else or rely on the contents of this email, and you should DELETE it from your system. We make every effort to keep our network free from viruses, but you should check this email and any attachments for viruses, as we can take no responsibility for any virus which may be transferred by this email. Thank you.

Please be aware that there is significant risk, due to the increasing use of cyber fraud by criminals, affecting email accounts and specifically bank account details. Please note that our Company's bank account details will never change via email. Please be extra vigilant and recheck our bank account details with the person responsible for your matter before sending funds to us if you are in any doubt whatsoever. We will not accept any responsibility if you transfer money to an incorrect bank account.

Sheffield Plan Consultation Representation Form January – February 2023

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

Responses can be submitted via

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

Please note:

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

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

Data Protection Notice:

Under the General Data Protection Regulation 2016 (GDPR) and Data Protection Act 2018 (DPA) Sheffield City Council is a Data Controller for the information it holds about you. The lawful basis under which the Council uses personal data for this purpose is consent.

All representations are required to be made public and will be published on the Council's website following this consultation. Your representations and name/name of your organisation will be published, but other personal information will remain confidential. Your data and comments will be shared with other relevant agencies involved in the preparation of the local plan, including the Planning Inspectorate. Anonymous responses will not be considered. Your personal data will be held and processed in accordance with the Council's Privacy Notice which can be viewed at: <https://www.sheffield.gov.uk/utilities/footer-links/privacy-notice>

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

Please tick/ delete as appropriate:

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

Yes

No

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

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

Yes

No

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

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

Yes

No

Printed Name: Roland Bolton

Signature: Roland Bolton

Date: 20/02/23

This form has two parts:

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

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

Part A- Personal Details

1. Personal Details

Name: Paul Burton
Organisation (if applicable): Hallam Land Management
Address: C/o Agent
Postcode: C/o Agent
Tel: C/o Agent
Fax:
Email: C/o Agent

2. Agent Details (if applicable)

Agent: Roland Bolton
Organisation (if applicable): DLP PLanning Ltd
Address: 2 Tenter Street
Postcode: S1 4BY
Tel: [REDACTED]
Fax:
Email: [REDACTED]

Part B - Your representation

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

Name or Organisation: DLP Planning

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

Policy Number: SP1, SP2

Paragraph Number:

Policies Map:

4. Do you consider the Sheffield Plan is:

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

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

No

4.(2) **Sound** Yes

No

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

No

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

See attached report

Continue on a separate sheet if necessary

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

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

See attached report

Continue on a separate sheet if necessary

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

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

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

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

Yes

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

No

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

The SPRU/DLP Planning Ltd have significant experience both in plan making, and local plan examinations, especially in terms of the tests of soundness so their experience on these matters will be of assistance to the inspectors.

The issues raised in this objection are not stand alone but must be regarded as part of a wider objection to the Local Plan. The failings of the local plan are both systemic and raise complex issues that are inter related across the whole plan making process which have lead to the plan as a whole being unsound.

In order to demonstrate this objections fully and to appropriately test that soundness of the plan will require attendance of suitably knowable persons at the hearings.

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.

Sheffield Plan Consultation Representation Form January – February 2023

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

Responses can be submitted via

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

Please note:

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

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

Data Protection Notice:

Under the General Data Protection Regulation 2016 (GDPR) and Data Protection Act 2018 (DPA) Sheffield City Council is a Data Controller for the information it holds about you. The lawful basis under which the Council uses personal data for this purpose is consent.

All representations are required to be made public and will be published on the Council's website following this consultation. Your representations and name/name of your organisation will be published, but other personal information will remain confidential. Your data and comments will be shared with other relevant agencies involved in the preparation of the local plan, including the Planning Inspectorate. Anonymous responses will not be considered. Your personal data will be held and processed in accordance with the Council's Privacy Notice which can be viewed at: <https://www.sheffield.gov.uk/utilities/footer-links/privacy-notice>

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

Please tick/ delete as appropriate:

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

Yes

No

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

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

Yes

No

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

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

Yes

No

Printed Name: Roland Bolton

Signature: Roland Bolton

Date: 20/02/23

This form has two parts:

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

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

Part A- Personal Details

1. Personal Details

Name: Paul Burton
Organisation (if applicable): Hallam Land Management
Address: C/o Agent
Postcode: C/o Agent
Tel: C/o Agent
Fax:
Email: C/o Agent

2. Agent Details (if applicable)

Agent: Roland Bolton
Organisation (if applicable): DLP PLanning Ltd
Address: 2 Tenter Street
Postcode: S1 4BY
Tel: [REDACTED]
Fax:
Email: [REDACTED]

Part B - Your representation

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

Name or Organisation: DLP Planning

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

Policy Number: SP1, SP2

Paragraph Number:

Policies Map:

4. Do you consider the Sheffield Plan is:

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

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

No

4.(2) **Sound** Yes

No

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

No

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

See attached report

Continue on a separate sheet if necessary

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

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

See attached report

Continue on a separate sheet if necessary

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

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

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

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

Yes

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

No

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

The SPRU/DLP Planning Ltd have significant experience both in plan making, and local plan examinations, especially in terms of the tests of soundness so their experience on these matters will be of assistance to the inspectors.

The issues raised in this objection are not stand alone but must be regarded as part of a wider objection to the Local Plan. The failings of the local plan are both systemic and raise complex issues that are inter related across the whole plan making process which have lead to the plan as a whole being unsound.

In order to demonstrate this objections fully and to appropriately test that soundness of the plan will require attendance of suitably knowable persons at the hearings.

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.

For and on behalf of
Hallam Land Management

**Sheffield Local Plan Regulation 19
Objection to Policies SP1 (parts a) c) and h) and SP2
and omission site**

**Land at Broomfield Lane, Stocksbridge (S04144)
Land at Oakes Park, Bochum Parkway**

**Prepared by
Strategic Planning Research Unit
DLP Planning Ltd
Sheffield**

February 2023



| | |
|---------------------|--|
| Prepared by: | Megan Wilson BSc (Hons) MSc MRTPI CIHCM Associate Director |
| Checked by: | Roland G Bolton BSc (Hons) MRPTI Senior Director |
| Approved by: | Roland G Bolton BSc (Hons) MRPTI Senior Director |
| Date: February 2023 | Office: Sheffield |

Strategic Planning Research Unit

**V1 Velocity Building
Ground Floor
Tenter Street
Sheffield
S1 4BY**

**Broad Quay House (6th Floor)
Prince Street
Bristol
BS1 4DJ**

**4 Abbey Court
Fraser Road
Priory Business Park
Bedford
MK44 3WH**

DLP Consulting Group disclaims any responsibility to the client and others in respect of matters outside the scope of this report. This report has been prepared with reasonable skill, care and diligence. This report is confidential to the client and DLP Planning Ltd accepts no responsibility of whatsoever nature to third parties to whom this report or any part thereof is made known. Any such party relies upon the report at their own risk.

| CONTENTS | PAGE |
|--|-------------|
| 1.0 INTRODUCTION | 4 |
| 2.0 Land at Broomfield Lane, Stocksbridge..... | 5 |
| a) Allocation of the Subject Site | 5 |
| b) Assessment of the Subject Site | 7 |
| c) Deliverability | 11 |
| 3.0 Land at Oakes Park, Bochum Parkway | 13 |
| a) Allocation and Assessment of the Subject Site | 13 |
| b) Site Assessment – Key Considerations | 14 |
| Access | 14 |
| Topography | 14 |
| Ground Conditions | 14 |
| Flood Risk and Drainage | 15 |
| Legal/Operational | 15 |
| Environmental..... | 15 |
| Landscape and Trees | 15 |
| Cultural Heritage | 15 |
| Utilities and Infrastructure | 15 |
| c) Deliverability | 15 |
| 4.0 Conclusion | 17 |

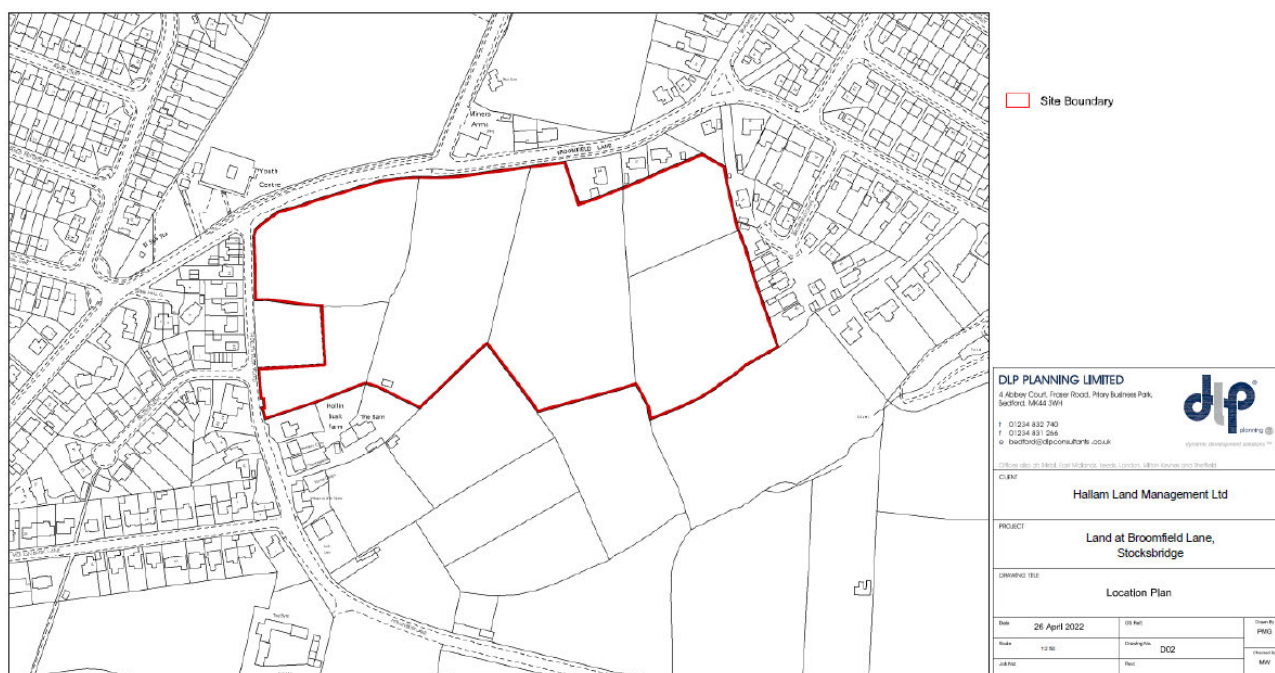
1.0 INTRODUCTION

- 1.1 This representation has been prepared by the Strategic Planning Research Unit (SPRU) of DLP Planning Ltd on behalf of Hallam Land Management (HLM).
- 1.2 This submission forms part of our objection to policies SP1 (parts a) c) and h) and SP2 as it demonstrates, by example, how a higher level of housing provision can be achieved by the allocation of additional Greenfield and Green Belt sites. It goes on to demonstrate that the development of sites, such as the one that forms part of this objection, will deliver far greater benefits when compared to the limited harm, including harm to the green belt function that would result from this development. This site will make a significant contribution to meeting housing needs and in particular the provision of family and affordable housing which will not be met by the strategy as set out on Policies SP1 and SP2. This objection demonstrates that when undertaking the judgement of benefits and harm it is necessary to consider the actual site that is being proposed (including possible mitigation) rather than relying on more generic assessments of larger areas and ignoring possible mitigation measures.
- 1.3 Hallam Land Management is one of the largest land promoters in the UK and form part of Henry Boot Ltd, a Sheffield company, who have a long-standing track record of supporting the Council to boost the local economy and promote the region at a national and international level.
- 1.4 These representations should be read alongside the Strategic Representations prepared by SPRU on behalf of HLM, Limes Development, Integrated Villages and Strata Homes and should be considered in the context of an overarching support for the preparation of a new Local Plan for Sheffield.
- 1.5 Notwithstanding this, and as detailed in this submission and the Strategic Representation, HLM have a number of concerns in respect of the Local Plan as drafted and do not consider the Plan to be sound or legally compliant.
- 1.6 This submission sets out details of two sites under control of HLM in the Plan area, and aligned to the conclusions of the Strategic Representation, sets out how both of the sites are available, achievable and suitable for residential development to assist the Council in meeting a justified housing requirement.
- 1.7 Accordingly, details of the following sites are set out below;
 - Land at Broomfield Lane, Stocksbridge (S04144);
 - Land at Oakes Park, Bochum Parkway.
- 1.8 On the basis of the details set out in the Strategic Representation and within this submission and on the basis that the Council need to allocate land to meet the specific needs of families HLM **object to Policy SP1 in particular criterion a, c and h of said policy along with the provisions set out in Policy SP2.**

2.0 LAND AT BROOMFIELD LANE, STOCKSBRIDGE

- 2.1 The subject site is situated on land to the south of Broomfield Lane, Stocksbridge (Figure 1). At Planning Committee on 10 January 2023, Members approved, subject to legal agreement, an outline planning application for up to 75 dwellings on the subject site.
- 2.2 The site comprises approximately 4.84 hectares to the east of the settlement of Stocksbridge. Existing residential development is located along the length of the eastern and western boundaries of the subject site, with open land to the immediate south of the site, some distance beyond which lies the land at Carr Road, which benefits from outline planning permission for residential development.
- 2.3 The site comprises medium sized fields, currently used for grazing, with drystone walls and fencing dividing the site up. The site currently houses some small stables, a field shelter and a single metal container, with no other permanent buildings within the site boundary.
- 2.4 The below site location plan confirms the boundary of the land being promoted by Hallam Land Management, and that subject to recent planning applications;

Figure 1. Site Location Plan



a) Allocation of the Subject Site

- 2.5 The subject site was identified as a proposed residential allocation within the draft Local Plan that was considered at the Transport, Regeneration and Climate Committee meeting on 3 November 2022 and the Sheffield Full Council meeting on 14 December 2022.
- 2.6 In line with the evidence supporting the draft Local Plan, Officer's recommended the site (over a marginally larger site area) for allocation for 140 dwellings (SD04) and considered that this approach supported not just the proposed planning strategy but reflected the identified site specific constraints and opportunities.
- 2.7 At the Sheffield Full Council meeting on 14 December, a modification to the Plan, removing the proposed allocation, was put forward and carried by Councillors. The subject site was

subsequently removed from the Plan currently being consulted upon.

- 2.8 As recorded in the minutes of the 14 December meeting, the modification and deletion of the allocation was predicated on the basis that the cumulative impact of developing Site SD04 would cause irreparable damage to the local Green Network, cause further harm to the landscape character of the area, merge the distinct settlements of Stocksbridge and Deepcar, cause a deterioration in existing local flooding issues and cause harm to local wildlife and habitats.
- 2.9 Two separate outline planning applications were submitted to the Council and were at this time under consideration. The first sought outline planning permission for up to 75 dwellings (22/02302/OUT) and the second sought planning permission for up to 92 dwellings (22/02303/OUT). Both applications were recommended for approval by Officers prior to being considered at planning committee.
- 2.10 At Planning Committee on 10 January 2023, Members considered both applications and despite the decision to deallocate the site, approved the application for up to 75 dwellings, subject to legal agreement. The application for 92 dwellings was refused, with a single Reason for Refusal relating to landscape/character harm being cited. Work is progressing promisingly in respect of a Section 106 legal agreement.
- 2.11 HLM maintain that the site subject to the recent planning applications is capable of accommodating up to 92 residential dwellings, and in order to demonstrate that the development potential of the site has been maximised, it is appropriate to allocate the site, subject to the application, for up to 92 dwellings.
- 2.12 Notwithstanding the refusal on the ground of character harm, HLM and the technical team supporting the application are confident that this scale of development could be achieved without giving rise to any unacceptable harm on the character or wider landscape of the area. This is also the position taken by Officers in so far as the application for 92 dwellings was recommended for approval.
- 2.13 The below illustrative framework plans for the applications for both 75 and 92 dwellings are provided at figures 2 and 3 below, and demonstrate how the site can accommodate up to 92 dwellings whilst ensuring strong design and respect for the local character and landscape setting of the site.

Figure 2. Up to 75 Dwellings – Illustrative Framework Plan



Figure 3. Up to 92 Dwellings – Illustrative Framework Plan



b) Assessment of the Subject Site

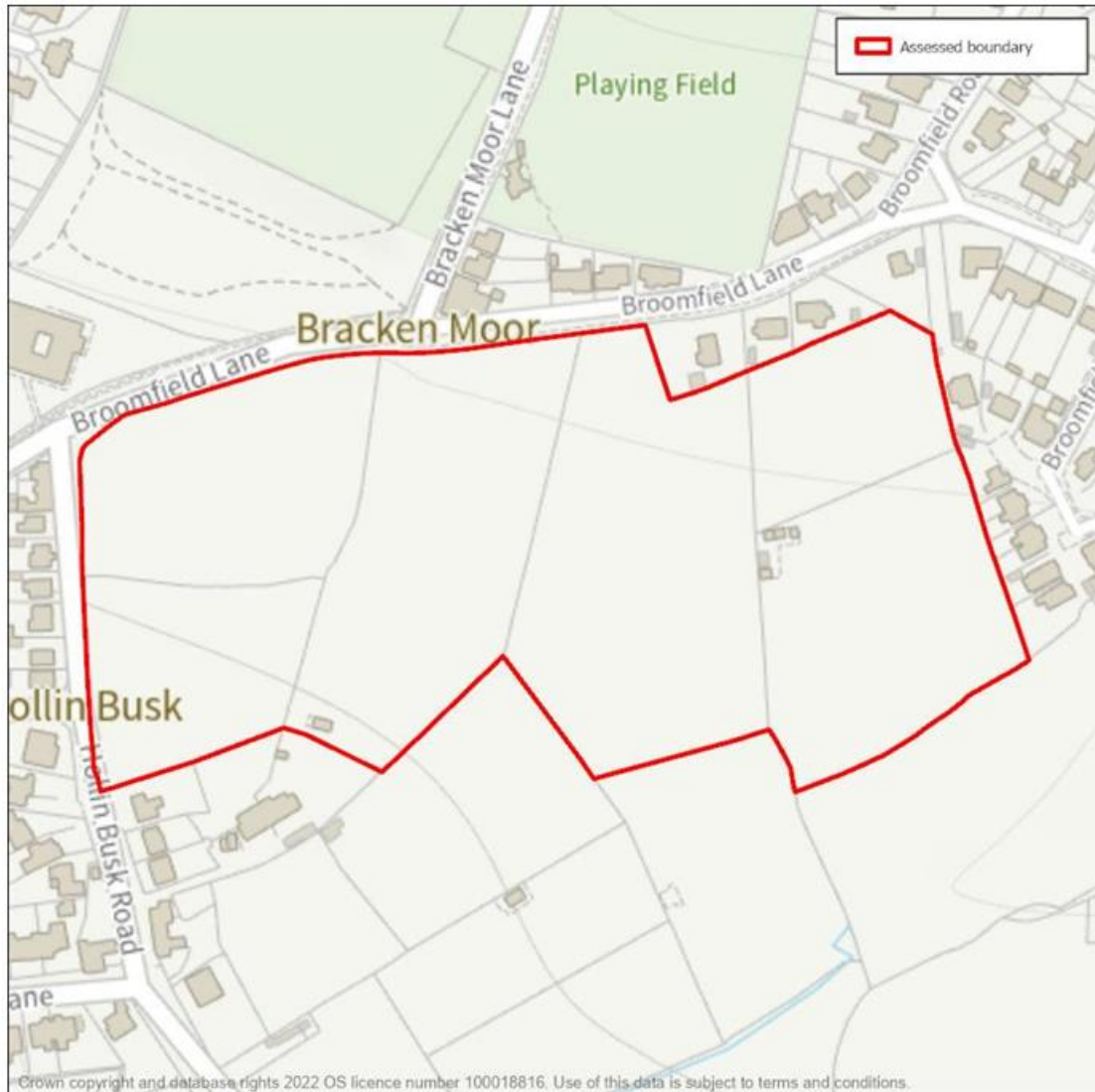
2.14 Given that the site (a slightly larger site area) was recommended for allocation by Officers,

P:\GENERAL (G)\G\G5124PS Sheffield Local Plan Reg 19 Consultation\y PLANNING\2023 Regulation 19\Final Issue\02.18.MW.YK6978PS.Land at Broomfield Lane and Oakes Park Site Specific SP1 SP2 obo Hallam Land Management.docx

the Council have assessed the site in reasonable detail, with outcomes listed in the Site Methodology and Integrated Impact Assessment.

2.15 The below plan shows the extent of the site assessed by the Council;

Figure 4. Site S04144 – As Assessed by the Council



2.16 Within the Suitability Assessment, the site scores positively against the following indicators;

- Proximity to incompatible uses
- Loss of onsite Open Space
- Loss of community/leisure/recreation facilities
- Distance to core public transport network
- Loss of BMV
- Impact on heritage assets
- Impact on geology
- Flood Risk
- Education Capacity
- Availability of local facilities
- Proximity to regulated waste sites
- Likelihood of existing land contamination
- Impact on Local Green Spaces

2.17 The only indicator where the site scored negatively was in respect of the use of Previously Developed Land. It should be noted however that it is simply because the site is greenfield that a policy compliant level of affordable housing can be delivered. This is especially important in the context of a Plan where the Whole Plan Viability evidence actually advocates a 0% affordable housing requirement and is clear that a number of proposed allocations are unviable, even on the basis of a 0% affordable requirement.

2.18 The below table sets out all indicators where the site scored a neutral and provides HLM's response to this indicator. This should however be considered in the context of a site where the principle of development has been established by virtue of the decision made by Members on the 10 January;

Table 1. Site Assessment Neutral Indicators

| Indicator | Indicator Score Result | Response |
|--|--|--|
| Sufficient existing Open Space in the surrounding area | Insufficient open space - up to 20% below policy standard | As demonstrated on the above masterplans, both the proposed development schemes for 75 and 92 dwellings will deliver considerable areas of open space to meet the needs of new residents and local residents in the wider area. |
| Impact on rural landscape character | Landscape has low capacity for absorbing development | Both above listed planning applications were submitted alongside a detailed Landscape and Visual Impact Assessment which demonstrated how, through careful design, as set out on the above masterplans, the site can accommodate residential development whilst respecting and reflecting the surrounding landscape character. |
| Impact on Air Quality | Residential site outside air quality exceedance area or is an employment site. | The subject site is not located in an Air Quality Management Area and no objections or concerns were raised in respect of Air Quality as part of the recent planning applications. |
| Proximity to hazardous installations or closed landfill sites. | Site is within 250m of a closed landfill site. | Both planning applications were supported by detailed geotechnical surveys which considered in detail any hazardous contamination sources. The conditions attached to the permission, subject to legal agreement, for the 75 dwellings control any risk in a manner acceptable to Environmental Health and the Council's Planners. |

2.19 Whilst it is clear from the Council's assessment of the site and the subsequent granting of planning permission, subject to a legal agreement, that the site is deliverable and suitable for identification as part of the Regulation 19 version of the Local Plan, we have set out how the site meets the suitability, deliverability and availability tests set out in national policy.

c) Deliverability

2.20 The glossary to the National Planning Policy Framework 2021 (NPPF21) confirms that in order for a site to be considered deliverable, it should be available now, offer a suitable location for development now and be achievable with a realistic prospect that housing will be delivered on the site within five-years.

2.21 The NPPF glossary also confirms that to be considered developable, sites should be in a location suitable for development with a reasonable prospect that they will be available and be viably development at the point envisages.

2.22 The below therefore assesses the site in terms of its suitability, availability and achievability.

Suitability

2.23 The Planning Practice Guidance (PPG) confirms that a site can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated (Paragraph: 012 Reference ID: 3-018-20190722).

2.24 The site is located on the edge of a sustainable settlement, as identified within the Council's draft Local Plan and supporting evidence. As confirmed through the recent planning applications, the site is within a reasonable walking distance of day-to-day services and facilities. The site is connected to higher order services and facilities by regular bus services and as such, it is therefore well placed to encourage more sustainable patterns of travel and reduce reliance on the private car, consistent with the sustainable principles set out in the NPPF21.

2.25 In terms of technical constraints (including access, topography, landscape, trees, noise and flood risk), the technical reports supporting the planning application confirm that any harms can be suitably mitigated through layout, design and conditioned measure and as such there are no identifiable constraints that are considered a barrier to development. No technical objections were identified through the application process, and by virtue of the granting of planning permission for residential development of up to 75 dwellings, it is clear that the site is deliverable.

2.26 The site is therefore considered suitable for development to meet the housing needs of residents of the City and in line with the principle of development established through the application, the site should be reinstated as an allocation.

Availability

2.27 The PPG states that a site can be considered available for development, when, on the best information available, there is confidence that there are no legal or ownership impediments to development. Land controlled by a landowner who has expressed an intention to development may be considered available (Paragraph: 0.19 Reference ID: 3-019-20190722).

2.28 The site is controlled by Hallam Land Management It is Hallam Land's intention, as demonstrated through the recent planning application, is to bring the site forward for residential development in the immediate future.

Achievability

2.29 The PPG confirms a site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of the

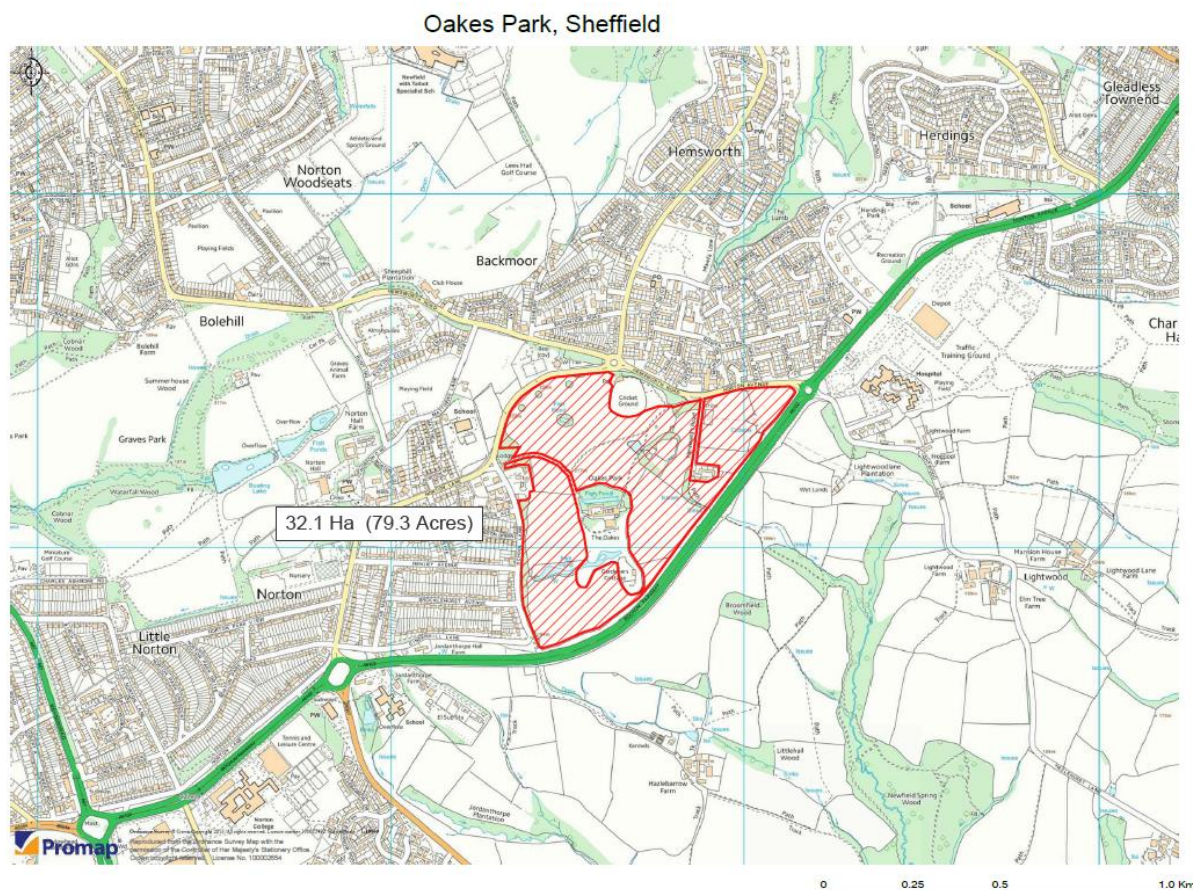
site, and the capacity of the developer to complete and let or sell the development over a certain period of time (Paragraph: 020 Reference ID: 3-020-20190722).

- 2.30 Through the preparation of the technical evidence supporting the application, all technical constraints have been considered and addressed through the application process. The proposed development of both 75 and 92 dwellings would deliver a policy compliant level of affordable housing and the landowner, given their extensive experience, is confident that this can be viably delivered on-site.
- 2.31 The site is therefore considered achievable for development as proposed within the live planning application.
- 2.32 On the basis of the above, the Council should seek to include reference to the site in the Local Plan, either as a listed consent or by allocating the site, as previously proposed, but should ensure that the capacity of the site is reflective of the quantum of development that all technical reports and consultee comments confirm it is capable of accommodating. As such, the Plan should be modified to reinstate site SD04.

3.0 LAND AT OAKES PARK, BOCHUM PARKWAY

- 3.1 The land at Oakes Park is located directly to the north of Bochum Parkway. The site is enclosed by residential development to the north, east and west, and as such is surrounded on all sides by built form.
- 3.2 The site comprises multiple fields totally 32.1ha. There are a number of trees located within the boundary of the site, but given the scale of the boundary, it is expected that levels of retention would be high, with appropriate mitigation employed in instances where loss was required.
- 3.3 The site currently lies in the Sheffield Green Belt, but given the surrounding uses, it is considered that the site performs poorly against each of the five purposes of the Green Belt.

Figure 5. Land at Oakes Park, Sheffield



a) Allocation and Assessment of the Subject Site

- 3.4 The subject site is not proposed for allocation as is confirmed on the interactive policy map. Instead it is proposed that the site remain part of the defined Green Belt.
- 3.5 As is confirmed in the Site Assessment document and the Integrated Impact Assessment, the subject site has not been assessed in detail by the Council.
- 3.6 Notwithstanding this, and as detailed in the supporting Strategic Representation, we consider it fundamentally necessary for the purpose of producing a sound and legally compliant Plan,

for the Council to identify additional sites to accommodate residential development, and as such have set out the key considerations in respect of the land at Oakes Park and its ability to deliver meaningful levels of economic growth.

- 3.7 The subject site was considered in the September 2021 Green Belt Review under site references S01219 and S01220. Within the assessment, as confirmed at Appendix 5, the parcel assessed scored as follows;

Table 2. Green Belt Assessment Stage 2 Scoring – Oakes Park

| Reference | GB Purpose 1 | GB Purpose 2 | GB Purpose 3 | GB Purpose 5 | Total GB Score | Robustness of GB Boundary |
|-----------|--------------|--------------|--------------|--------------|----------------|---------------------------|
| S01219 | 2 | 1 | 5 | 5 | 13 | 1 |
| S01220 | 2 | 1 | 5 | 5 | 13 | 1 |

- 3.8 It is noted that the single proposed Green Belt release in the Plan, Norton Aerodrome, scored (one of the two parcels) more favourably in respect of the Green Belt purposes as part of the same Stage 2 assessment. The scores for the two relevant parcels were as follows;

Table 3. Green Belt Assessment Stage 2 Scoring – Norton Aerodrome

| Reference | GB Purpose 1 | GB Purpose 2 | GB Purpose 3 | GB Purpose 5 | Total GB Score | Robustness of GB Boundary |
|-----------|--------------|--------------|--------------|--------------|----------------|---------------------------|
| DS-3-a | 5 | 1 | 1 | 4 | 11 | 3 |
| DS-3-b | 4 | 1 | 5 | 5 | 15 | 3 |

- 3.9 Accordingly, it is clear that the site at Oakes Park, save for heritage impact which can be mitigated, performs poorly in respect of the function of the Green Belt. With build form on all sides, and the Council boundary and Bochum Parkway acting as a nature defensible boundary to the south, we recommend that the Council pause submission of the Local Plan and assess the site in detail as part on an SA/Site Assessment addendum.

b) Site Assessment – Key Considerations

Access

- 3.10 There are multiple options for achieving suitable vehicular access to the subject site including via Norton Lane to the north, or indeed the roundabout serving Norton Lane and Hemsworth Lane. A detailed Transport Assessment including consideration of suitable access points would be produced to sit alongside an application or as required could be produced in advance of this to support the site through Examination in Public, were the Council to agree that it is necessary to consider all reasonable alternatives.

Topography

- 3.11 The site gently falls from south to north from a height of around 209m Above Ordinance Datum (AOD) to around 222m AOD. The topography of the subject site is not therefore considered a significant constraint to development.

Ground Conditions

- 3.12 Given the previous uses of the site, it is not anticipated that any sources of contamination will be present. Any application or promotion through Examination would be supported by a Phase I Site Investigation that considers any sources of contamination and any mitigation measures required.

Flood Risk and Drainage

- 3.13 The site is located entirely within Flood Zone 1 (low risk of flooding) as illustrated on the Environment Agency's Flood Map for Planning, such that the site's development would be consistent with the sequential approach to development prescribed in the NPPF. Further, there are no known surface water drainage issues on the site.

Legal/Operational

- 3.14 There are no known legal/operational issues associated with the development of the site for residential purposes.

Environmental

- 3.15 The site does not contain or is within close proximity of any statutory ecological sites. There are a number of non-statutory ecological sites within a 1km radius of the site, however no adverse effects are predicted.

- 3.16 Any development proposals at the site would be informed by a Phase 1 Habitat Survey and any necessary species survey. In accordance with the NPPF (paragraphs 179-180) any development proposals could be designed in order to increase biodiversity.

Landscape and Trees

- 3.17 The subject site carries no designations for landscape quality at national or local level. The subject site is fairly well contained by vegetation along the southern boundary and existing built form to the north and west. Views of the site are generally limited to short distance views from neighbouring properties to the north, east and west. The majority of the existing

- 3.18 Landscape features located on the site can be retained within an appropriate layout.

Cultural Heritage

- 3.19 The site wraps around a number of Listed Buildings and forms part of the Oaks Park Conservation Area, but given the scale of the site, appropriate mitigation can be achieved. Any proposals would reflect the character of the area and reflect any identified heritage significance.

Utilities and Infrastructure

- 3.20 There are no known constraints with regards to the availability of electricity, water, telecommunications and foul sewerage networks.

c) Deliverability

- 3.21 The glossary to the National Planning Policy Framework (NPPF21) confirms that in order for a site to be considered deliverable, it should be available now, offer a suitable location for development now and be achievable with a realistic prospect that housing will be delivered on the site within five-years.

- 3.22 The NPPF glossary also confirms that to be considered developable, sites should be in a location suitable for development with a reasonable prospect that they will be available and be viably development at the point envisages.

3.23 The below therefore assesses the site in terms of its suitability, availability and achievability.

Suitability

3.24 The Planning Practice Guidance (PPG) confirms that a site can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated (Paragraph: 012 Reference ID: 3-018-20190722).

3.25 The site is located on the edge of a sustainable settlement, as identified within the Council's draft Local Plan and supporting evidence. The site is within a reasonable distance of existing services and facilities. The site is connected to higher order services and facilities by regular bus services and as such, it is therefore well placed to encourage more sustainable patterns of travel and reduce reliance on the private car, consistent with the sustainable principles set out in the NPPF21.

3.26 In terms of technical constraints (including access, topography, landscape, trees, noise and flood risk), it is not expected that there are any technical constraints that would be of impediment to development.

3.27 The site is therefore considered suitable for development to meet the housing needs of residents of the City.

Availability

3.28 The PPG states that a site can be considered available for development, when, on the best information available, there is confidence that there are no legal or ownership impediments to development. Land controlled by a landowner who has expressed an intention to development may be considered available (Paragraph: 0.19 Reference ID: 3-019-20190722).

3.29 The site is controlled by Hallam Land Management It is Hallam Land's intention is to bring the site forward for residential development in the immediate future.

Achievability

3.30 The PPG confirms a site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of the site, and the capacity of the developer to complete and let or sell the development over a certain period of time (Paragraph: 020 Reference ID: 3-020-20190722).

3.31 There are no known technical or viability constraints, and HLM expect that the site could viably deliver a policy compliant level of affordable housing.

3.32 The site is therefore considered achievable for development as proposed within the live planning application.

3.33 On the basis of the above, the Council should seek to pause submission of the Local Plan and identify additional sites to meet the shortfall in supply outlined in the accompanying Strategic Representations. The site should be subject to robust testing and it is the position of HLM that the site's release from the Green Belt would have limited impact in respect of maintain the five Green Belt purposes.

4.0 CONCLUSION

- 4.1 The preparation of a new Local Plan for Sheffield is fully supported and given the datedness of the existing Development Plan is considered necessary.
- 4.2 The land at Broomfield Lane and Oakes Park, is all capable and suitable for allocation for residential purposes. The Council should consider reallocation of the land at Broomfield Lane and should pause submission of the Plan to undertake detailed assessment of the land at Oakes Park.
- 4.3 As is set out in the supporting Strategic Representations, without the allocation of greenfield land and release of further Green Belt land, the Council cannot meet their minimum housing requirement and furthermore, given the complexities, viability issues and lack of detailed assessment of a number of allocated sites, the Council cannot even meet the artificially reduced requirement set out in the Plan.
- 4.4 There is an urgent need to address the housing needs of people in the City and in particular provide housing suitable to meet the needs of families.
- 4.5 Given the identified shortfalls in respect of site assessments and reasoning for assessing certain sites, we consider it necessary that the Council revisit the methodology for assessment, the Sustainability Appraisal and the Integrated Impact Assessment and produce a detailed Green Belt Assessment which considers the sites in line with the application boundary.
- 4.1 **For clarity, HLM object to Policy SP1 and Policy SP2 on the basis that the land at Broomfield Lane, Stocksbridge and land at Oakes Park should be allocated to meet the housing needs of families in the Local Authority Area.**



BEDFORD

Planning / SDD / SPRU

bedford@dlpconsultants.co.uk

BRISTOL

Planning / SDD / SPRU

bristol@dlpconsultants.co.uk

EAST MIDLANDS

Planning/ SDD

nottingham@dlpconsultants.co.uk

LEEDS

Planning

leeds@dlpconsultants.co.uk

LIVERPOOL

Planning

liverpool@dlpconsultants.co.uk

LONDON

Planning

london@dlpconsultants.co.uk

MILTON KEYNES

Planning

miltonkeynes@dlpconsultants.co.uk

RUGBY

Planning

rugby.enquiries@dlpconsultants.co.uk

SHEFFIELD

Planning/ SDD / SPRU

sheffield@dlpconsultants.co.uk



RTPI

Chartered Town Planner

