

From: [REDACTED]
To: [REDACTED]
Subject: G5124 Local Plan Objection to Section 1
Date: 20 February 2023 18:14:14
Attachments: [image001.png](#)
[02.20.RGB.G5124PS.Regulation 19 Consultation Objection to Introduction.pdf](#)
[02.20.RGB.G5124PS.Regulation 19 Consultation Objection to Introduction.pdf](#)

Please find attached objections on behalf of our clients regarding Section 1 Introduction

Roland G Bolton BSc (Hons) MRTPI
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From: [REDACTED]
To: [REDACTED]
Subject: RE: G5124 Local Plan Objection to Policy H1
Date: 20 February 2023 18:54:06
Attachments: [image001.png](#)
[SCC_Reg_19_Consultation_Form_-_Parts_A_and_B_H1.pdf](#)
[02.20.RGB.G5124PS.Regulation_19_Objection_H1.pdf](#)

Please find attached objections on behalf of our clients regarding H1

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From: [REDACTED]
To: [REDACTED]
Subject: RE: G5124 Local Plan Objection to Section 2
Date: 20 February 2023 18:21:19
Attachments: [image001.png](#)
[02.20.RGB.G5124PS.Regulation.19.Consultation.Objection.to.Section.2.pdf](#)
[SCC.Reg.19.Consultation.Form.-.Parts.A.and.B.Visions,Aims.and.Objectives.pdf](#)

Please find attached objections on behalf of our clients regarding Section 2

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From: [REDACTED]
To: [REDACTED]
Subject: RE: G5124 Local Plan Objection to Section 3
Date: 20 February 2023 18:47:21
Attachments: [image001.png](#)
[02.20.RGB.G5124PS.Regulation.19.Consultation.Objection.to.Section.3.pdf](#)
[SCC.Reg.19.Consultation.Form.-.Parts.A.and.B.Growth.Plan.and.Spatial.Strategy.pdf](#)

Please find attached objections on behalf of our clients regarding Section 3

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From: [REDACTED]
To: [REDACTED]
Subject: RE: G5124 Local Plan Objection to SP1
Date: 20 February 2023 18:30:34
Attachments: [image001.png](#)
[SCC_Reg_19_Consultation_Form_-_Parts_A_and_B_SP1.pdf](#)
[02.20.RGB.G5124PS.Regulation_19_Objection_to_SP1.pdf](#)

Please find attached objections on behalf of our clients regarding Policy SP1

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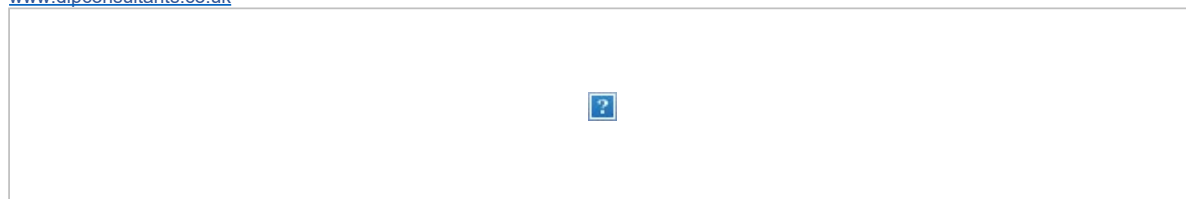
From: [REDACTED]
To: [REDACTED]
Subject: RE: G5124 Local Plan Objection to SP2
Date: 20 February 2023 18:37:28
Attachments: [image001.png](#)
[SCC_Reg_19_Consultation_Form_-_Parts_A_and_B_SP2.pdf](#)
[02.20.RGB.G5124PS.Regulation_19_Objection_SP2.pdf](#)

Please find attached objections on behalf of our clients regarding Policy SP2

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From: [REDACTED]
To: [REDACTED]
Subject: RE: G5124PS - Representations to Sheffield Local Plan - Allocations CA1
Date: 20 February 2023 17:46:39
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.jpg](#)
[image004.png](#)
[SCC_Reg_19_Consultation_Form_-_Parts_A_and_B_CA1.pdf](#)
[02.19.RGB.G5124PS.Regulation_19_Allocations_CA1.pdf](#)

To whom it may concern

Please find attached representations in respect of **Allocations CA1**.

I'd be grateful if you could confirm receipt of these representations.

Kind regards

Kirsten

Kirsten Ward BSc (Hons) MA PhD MRTPI

Associate Director

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From: [REDACTED]
To: [REDACTED]
Subject: RE: G5124PS - Representations to Sheffield Local Plan - Allocations CA2
Date: 20 February 2023 17:49:33
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.jpg](#)
[image004.png](#)
[SCC_Reg_19_Consultation_Form_-_Parts_A_and_B_CA2.pdf](#)
[02.19.RGB.G5124PS.Regulation_19_Allocations_CA2.pdf](#)

To whom it may concern

Please find attached representations in respect of **Allocations CA2**.

I'd be grateful if you could confirm receipt of these representations.

Kind regards

Kirsten

Kirsten Ward BSc (Hons) MA PhD MRTPI

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From: [REDACTED]
To: [REDACTED]
Subject: RE: G5124PS - Representations to Sheffield Local Plan - Allocations CA3
Date: 20 February 2023 18:09:09
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.jpg](#)
[image004.png](#)
[SCC_Reg_19_Consultation_Form_-_Parts_A_and_B_CA3.pdf](#)
[02.19.RGB.G5124PS.Regulation_19_Allocations_CA3.pdf](#)

To whom it may concern

Please find attached representations in respect of **Allocations CA3**.

I'd be grateful if you could confirm receipt of these representations.

Kind regards

Kirsten

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To: [REDACTED]
Subject: RE: G5124PS - Representations to Sheffield Local Plan - Allocations CA4
Date: 20 February 2023 18:10:20
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.jpg](#)
[image004.png](#)
[SCC_Reg_19_Consultation_Form_-_Parts_A_and_B_CA4.pdf](#)
[02.19.RGB.G5124PS.Regulation_19_Allocations_CA4.pdf](#)

To whom it may concern

Please find attached representations in respect of **Allocations CA4**.

I'd be grateful if you could confirm receipt of these representations.

Kind regards

Kirsten

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From: [REDACTED]
To: [REDACTED]
Subject: RE: G5124PS - Representations to Sheffield Local Plan - Allocations CA5
Date: 20 February 2023 18:11:42
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.jpg](#)
[image004.png](#)
[SCC_Reg_19_Consultation_Form_-_Parts_A_and_B_CA5.pdf](#)
[02.18.RGB.G5124PS.Regulation_19_Allocations_CA5.pdf](#)

To whom it may concern

Please find attached representations in respect of **Allocations CA5**.

I'd be grateful if you could confirm receipt of these representations.

Kind regards

Kirsten

Kirsten Ward BSc (Hons) MA PhD MRTPI

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From: [REDACTED]
To: [REDACTED]
Subject: RE: G5124PS - Representations to Sheffield Local Plan - Allocations CA6
Date: 20 February 2023 18:15:00
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.jpg](#)
[image004.png](#)
[SCC_Reg_19_Consultation_Form_-_Parts_A_and_B_CA6.pdf](#)
[02.17.MW.G5124PS.Regulation_19_Allocations_CA6.pdf](#)

To whom it may concern

Please find attached representations in respect of **Allocations CA6**.

I'd be grateful if you could confirm receipt of these representations.

Kind regards

Kirsten

Kirsten Ward BSc (Hons) MA PhD MRTPI

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From: [REDACTED]
To: [REDACTED]
Subject: RE: G5124PS - Representations to Sheffield Local Plan - Allocations SA2
Date: 20 February 2023 18:14:50
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.jpg](#)
[image004.png](#)
[SCC_Reg_19_Consultation_Form_-_Parts_A_and_B_SA2.pdf](#)
[02.19.MW.G5124PS.Regulation_19_Allocations_SA2.pdf](#)

To whom it may concern

Please find attached representations in respect of **Allocations SA2**.

I'd be grateful if you could confirm receipt of these representations.

Kind regards

Kirsten

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From: [REDACTED]
To: [REDACTED]
Subject: RE: G5124PS - Representations to Sheffield Local Plan - Allocations SA3
Date: 20 February 2023 18:16:02
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.jpg](#)
[image004.png](#)
[SCC_Reg_19_Consultation_Form_-_Parts_A_and_B_SA3.pdf](#)
[02.17.MW.G5124PS.Regulation_19_Allocations_SA3.pdf](#)

To whom it may concern

Please find attached representations in respect of **Allocations SA3**.

I'd be grateful if you could confirm receipt of these representations.

Kind regards

Kirsten

Kirsten Ward BSc (Hons) MA PhD MRTPI

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From: [REDACTED]
To: [REDACTED]
Subject: RE: G5124PS - Representations to Sheffield Local Plan - Allocations SA4
Date: 20 February 2023 18:17:06
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.jpg](#)
[image004.png](#)
[SCC_Reg_19_Consultation_Form_-_Parts_A_and_B_SA4.pdf](#)
[02.17.MW.G5124PS.Regulation_19_Allocations_SA4.pdf](#)

To whom it may concern

Please find attached representations in respect of **Allocations SA4**.

I'd be grateful if you could confirm receipt of these representations.

Kind regards

Kirsten

Kirsten Ward BSc (Hons) MA PhD MRTPI

Associate Director

Strategic Planning Research Unit

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To: [REDACTED]
Subject: RE: G5124PS - Representations to Sheffield Local Plan - Allocations SA5
Date: 20 February 2023 18:18:33
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.jpg](#)
[image004.png](#)
[SCC_Reg_19_Consultation_Form_-_Parts_A_and_B_SA5.pdf](#)
[02.17.MW.G5124PS.Regulation_19_Allocations_SA5.pdf](#)

To whom it may concern

Please find attached representations in respect of **Allocations SA5**.

I'd be grateful if you could confirm receipt of these representations.

Kind regards

Kirsten

Kirsten Ward BSc (Hons) MA PhD MRTPI

Associate Director

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From: [REDACTED]
To: [REDACTED]
Subject: RE: G5124PS - Representations to Sheffield Local Plan - Allocations SA6
Date: 20 February 2023 18:19:35
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.jpg](#)
[image004.png](#)
[SCC_Reg_19_Consultation_Form_-_Parts_A_and_B_SA6.pdf](#)
[02.17.MW.G5124PS.Regulation_19_Allocations_SA6.pdf](#)

To whom it may concern

Please find attached representations in respect of **Allocations SA6**.

I'd be grateful if you could confirm receipt of these representations.

Kind regards

Kirsten

Kirsten Ward BSc (Hons) MA PhD MRTPI

Associate Director

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t: [REDACTED]

m: [REDACTED]

email: [REDACTED]

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From: [REDACTED]
To: [REDACTED]
Subject: RE: G5124PS - Representations to Sheffield Local Plan - Allocations SA7
Date: 20 February 2023 18:21:10
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.jpg](#)
[image004.png](#)
[SCC_Reg_19_Consultation_Form_-_Parts_A_and_B_SA7.pdf](#)
[02.19.MW.G5124PS.Regulation_19_Allocations_SA7.pdf](#)

To whom it may concern

Please find attached representations in respect of **Allocations SA7**.

I'd be grateful if you could confirm receipt of these representations.

Kind regards

Kirsten

Kirsten Ward BSc (Hons) MA PhD MRTPI

Associate Director

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From: [REDACTED]
To: [REDACTED]
Subject: RE: G5124PS - Representations to Sheffield Local Plan - Allocations SA8
Date: 20 February 2023 18:21:48
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.jpg](#)
[image004.png](#)
[SCC_Reg_19_Consultation_Form_-_Parts_A_and_B_SA8.pdf](#)
[02.17.MW.G5124PS.Regulation_19_Allocations_SA8.pdf](#)

To whom it may concern

Please find attached representations in respect of **Allocations SA8**.

I'd be grateful if you could confirm receipt of these representations.

Kind regards

Kirsten

Kirsten Ward BSc (Hons) MA PhD MRTPI

Associate Director

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Try not to leave old messages attached unless they are relevant

From: [REDACTED]
To: [REDACTED]
Subject: RE: G5124PS - Representations to Sheffield Local Plan - Integrated Impact Assessment
Date: 20 February 2023 18:37:39
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.jpg](#)
[image004.png](#)
[SCC_Reg_19_Consultation_Form_-_Parts_A_and_B_The_Integrated_Impact_Assessment_Report.pdf](#)
[02.20.RGB.G5124PS.Regulation_19_Objection_to_IIA.pdf](#)

To whom it may concern

Please find attached representations in respect of the **Integrated Impact Assessment**.

I'd be grateful if you could confirm receipt of these representations.

Kind regards

Kirsten

Kirsten Ward BSc (Hons) MA PhD MRTPI

Associate Director

Strategic Planning Research Unit

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To: [REDACTED]
Subject: RE: G5124PS - Representations to Sheffield Local Plan - Policy NC3
Date: 20 February 2023 18:38:51
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.jpg](#)
[image004.png](#)
[SCC_Reg_19_Consultation_Form_-_Parts_A_and_B_NC3.pdf](#)
[02.20.RGB.G5124PS.Regulation_19_Objection_NC3.pdf](#)

To whom it may concern

Please find attached representations in respect of **Policy NC3**.

I'd be grateful if you could confirm receipt of these representations.

Kind regards

Kirsten

Kirsten Ward BSc (Hons) MA PhD MRTPI

Associate Director

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Subject: RE: G5124PS - Representations to Sheffield Local Plan - Policy NC4
Date: 20 February 2023 18:47:13
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.jpg](#)
[image004.png](#)
[NC4 SPRU Appendix 2 Viability of IRC - Local Plan Reps Nov 21 v3.pdf](#)
[SCC_Reg_19_Consultation_Form_-_Parts_A_and_B_NC4.pdf](#)
[02.20.RGB.G5124PS.Regulation_19_Objection_NC4_final.pdf](#)
[NC4 SPRU Appendix 1 IV - Local Plan Reps Nov 21 v3.pdf](#)

To whom it may concern

Please find attached representations in respect of **Policy NC4**.

I'd be grateful if you could confirm receipt of these representations and two appendices.

Kind regards

Kirsten

Kirsten Ward BSc (Hons) MA PhD MRTPI

Associate Director

Strategic Planning Research Unit

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Strategic Planning Research Unit
A specialist team within DLP Planning Ltd

For and on behalf of
**Hallam Land Management
Inspired Villages
Limes Developments Limited
Strata Homes (Yorkshire)**

**Sheffield Local Plan
Regulation 19 Consultation**

**Objections to the Local Plan
Introduction (paragraphs 1.1 and 1.35)**

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

February 2023



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

Strategic Planning Research Unit

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CONTENTS	PAGE
1.0 Objection to Introduction	4

1.0 OBJECTION TO INTRODUCTION

a) Paragraph 1.1

- 1.1 It is not considered that the Sheffield Plan sets out a strategy for future growth and change through to 2039 for reasons explained in our other objections (notably SP1 and the site specific objections) the plan simply does not set out the strategy for change as the strategy is reliant upon the delivery of sites that are unviable and sites that have not been allocated (i.e. unidentified sites in the Broad Areas of growth).
- 1.2 It is also challenged that the plan will help to deliver fairer city for everyone as there are clearly sectors for the population that are will be considerably disadvantaged by the strategy these are young people especially those wishing to enter into home ownership and/or start a family, those wanting affordable housing and those older persons wishing to enter into age appropriate housing (particularly market housing with care). This is because as will be demonstrated in our objection to policy SP1 the strategy fails to deliver the levels of family, affordable and Extra Care housing required to meet need.
- 1.3 The strategy also fails to deliver age appropriate housing, especially extra care market housing for which there is a demonstrable shortfall within the city and which would assist in release much needed family accommodation, affordable housing and older persons housing.
- 1.4 This makes the plan unsound as it fails to address these needs as required by NPPF paragraph 62.

1.5 **Action:**

1.6 **Plan fails test of soundness.**

b) Paragraph 1.35

- 1.7 The statement that the Plan is in accordance with the NPPF is seriously misleading to the public. The Council are building an expectation that they have fully conformed to the NPPF and the PPG, but this is not factually correct.
- 1.8 Paragraph 61 of the NPPF requires that strategic policies should be informed by a local housing need assessment, conducted using the Standard Method in national planning guidance – unless exceptional circumstances justify an alternative approach. Although not referred to in the Plan at all the strategy neither meets the level of housing required by the Standard Method or sets out any exceptional circumstances to justify an alternative approach. The Plan is completely silent on the issue.
- 1.9 Furthermore, the plan is contrary to NPPF Paragraph 26 because having failed to meet the housing requirement as set by the Standard Method the Council have then failed to undertake the next step which is engage with other local authorities to see if this need can be meet elsewhere. Instead the Local Plan states (incorrectly) that it does not require other Councils to assist in meeting its needs (LP Paragraph 3.7).

1.10 **Action:**

1.11 **The Duty to Cooperate is a legal requirement which the Plan fails.**



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RTPI

Chartered Town Planner



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, Grace Clarkson, Stuart Garnett and Marcus Jolly
Organisation (if applicable): Hallam Land Management, Strata Homes, Inspired Villages and Lime Developments Limited
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:

Paragraph Number: Section 2 Visions, Aims, and Objectives – 2.2, 2.12

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.



Strategic Planning Research Unit
A specialist team within DLP Planning Ltd

For and on behalf of
**Hallam Land Management
Inspired Villages
Limes Developments Limited
Strata Homes (Yorkshire)**

**Sheffield Local Plan
Regulation 19 Consultation**

**Objections to the Local Plan
Section 2 Vision, Aims, and Objectives (paragraphs 2.2 and 2.12)**

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

February 2023



Prepared by:	Roland G Bolton BSc (Hons) MRPTI Senior Director
Checked by:	Megan Wilson BSc (Hons) MSc MRTPI CIHCM Associate Director
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1.0 OBJECTION TO SECTION 2 VISION, AIMS , AND OBJECTIVES.

a) Paragraph 2.2

1.1 While the Council's vision maybe that by 2039, Sheffield should be economically stronger, fairer, more inclusive and sustainable this will unfortunately not be the case as older persons seeking age appropriate housing and younger people seeking home ownership and family housing will be significant disadvantaged. As will those in need of affordable housing of wishing to enter into older persons market housing with care. The reasons for this is not only the lack of choice of locations, type and tenure of development but also the fact that many allocated sites are unviable and undeliverable.

1.2 There are undoubtedly some very strong economic indicators for Sheffield which could if planned for correctly could result in the City playing a nationally significant economic role at the heart of its region, but the Councils approach to housing will certainly not result in thriving neighbourhoods and communities, as the proposed strategy only accommodates for those wishing to live in high density inner city locations and does not meet the need of future family households in terms of providing family housing or affordable housing or older persons housing or those wishing to live in locations other than the city centre.

1.3 Action:

1.4 **Plan fails test of soundness as there is an imbalance in the approach to housing and employment development (see objection to SP1).**

b) Paragraph 2.12

1.5 The implications of the strategy is to export those seeking to own their family home is unlikely to close the gap between the poorest and the wealthiest areas of the city. The lack of suitable level of family housing the exportation of those seeking such housing out of the city is likely to increase the gap as there will be a divergence of the wealthiest and poorest areas. This is statement is not supported by the evidence and is unsound.

1.6 The requirement for Sheffield to achieve zero carbon by 2030 is simply beyond the capability of this land use plan. It is also unevidenced as how this will be achieved or how it will be measured. In particular the reliance on the existing housing stock means that poor performing buildings will be in continuous occupation and the opportunities for this stock to be upgraded when it is sold on diminishes. This requirement is unevidenced and therefore unsound.

1.7 Despite this objective the strategy will not create a housing market that works for everyone and will not provide choice or affordability. The strategy is strongly focused on providing one type of accommodation (apartments and Student accommodation) in a single location (the city centre and its immediate environs) and as such is completely contrary to the evidence available on the need for housing in terms of the location of the need and type of accommodation required.

1.8 Recent experience in the city, is that the strategy will only deliver apartments for rent therefore not only will the need for family housing go unmet but the strategy will drive down homeownership and the benefits associated with that tenure will be unavailable to many future residents within the city.

1.9 While the objective is that there should be an adequate supply of housing to meet its requirement this is not what the plan actually seeks to deliver. The statement is clearly misleading. The requirement as set by the NPPF and the Standard Method is not being met and the Council do not claim that there are exceptional circumstances for not doing so.

1.10 One of the objectives for thriving neighbourhoods and communities is to “significantly increase the supply of ... specialist housing for older people”. However, there is simply no coherent plan set out in this Local Plan how that would be achieved. There is no attempt to

identify a housing requirement for specialist housing for older people or to set out the different types of specialist housing (age restricted, sheltered housing, extra care, care homes). Policy NC4 is so generic as to be meaningless (see representations on this policy later). There is not **one single site allocation** for older persons housing in the entirety of Appendix A; Site Allocations Schedule, which runs for 220 pages, or as set out at SP1(c) 372 Site Allocations.

- 1.11 The lack of a single allocation to meet the needs of the older population is a significant failing of the plan and as such the plan fails to address the ‘critical need’ for specialist housing for older people (see Para 001: [NPPG Housing for older and disabled people](#)).
- 1.12 The analysis set out in our objection to SP1 and NC3 demonstrate not only has the delivery of affordable housing in Sheffield been extremely poor but that, given the unviability of a significant number of the proposed allocations that even on the Councils own evidence will not deliver affordable housing this poor level of provision will endure throughout the whole plan period.
- 1.13 The objective to locate development in locations that minimize the need to travel is not going to be met by the present strategy. The lack of family housing means that many young people wishing to start families are moving beyond the city boundary and then commuting back in. Therefore while the strategy concentrate new housing around the city centre the know consequence of this strategy is actually to increase commuting distances for those who seek family housing.
- 1.14 **Action:**
- 1.15 **Plan fails test of soundness as it is not inclusive as claimed but significantly fails to meet the needs of certain groups it is not in compliance with national policy (paragraph 62).**



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RTPI

Chartered Town Planner



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, Grace Clarkson, Stuart Garnett and Marcus Jolly
Organisation (if applicable): Hallam Land Management, Strata Homes, Inspired Villages and Lime Developments Limited
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:

Paragraph Number: Section 3 Growth Plan and Spatial Strategy – 3.1, 3.3, 3.4, 3.6

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

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For and on behalf of
**Hallam Land Management
Inspired Villages
Limes Developments Limited
Strata Homes (Yorkshire)**

**Sheffield Local Plan
Regulation 19 Consultation**

**Objections to the Local Plan
Section 3 Growth Plan and Spatial Strategy (paragraphs 3.1, 3.3, 3.4, 3.6, 3.7, 3.8)**

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

February 2023



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

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1.0 Objection to Section 3 Growth Plan and Sptitial Strategy 4

1.0 OBJECTION TO SECTION 3 GROWTH PLAN AND SPATIAL STRATEGY

a) Paragraph 3.1

- 1.1 For the reasons set out in our objection to SP1 the plan does not deliver sufficient to meet the needs of the city because 1) the level being planned for is not the housing requirement and 2) the plan does not actually identify the sites to meet even its lower requirement the plan only allocates some 10,319 units in the Central Sub area and just 4,494 in the other sub-areas and is reliant upon 3,400 units to come forward on small sites and a further 4,675 units to be delivered on large windfall sites (SHELAA table 19). This means that 35% of the plan's housing delivery is on unidentified sites (8075/22,888).
- 1.2 This is despite the fact that there are sufficient sites to meet both the level of housing set in the plan and indeed the Standard Method.
- 1.3 **Action:**
- 1.4 **This is not planning positively as required by the NPPF and as such is unsound.**

Paragraph 3.3

- 1.5 The claim that the Central Sub-Area is the most accessible location in the city is somewhat misleading as the Central Sub-Area is subdivided by major roads and the River Don which limit movements especially pedestrian movements within the Sub Area. Just as importantly not all of the major employment locations are within the Sub Area so it does not represent the only focus for existing or future job creation.
- 1.6 **Action:**
- 1.7 **This is not supported by proportional evidence as required by the NPPF and as such is unsound.**

Paragraph 3.4

- 1.8 For the reasons set out in more detail in our objection to SP1 Sheffield's development needs to 2039 cannot be met within the existing urban areas and will require sites to be removed from the Green Belt. The housing requirement as set by the Five year housing land supply monitoring report (2022) is some 3,018 dpa requiring some 51,306 dwellings within the plan period. This requirement is the housing requirement for the city as it has not been challenged and no exceptional circumstances have been demonstrated.
- 1.9 This statement is unsound as the housing requirement is factually incorrect and presenting it in this way without any justification is misleading to the public.
- 1.10 Furthermore, as set out in our objections to SP1 and the site allocations it is our opinion that 1) the Local Plan simply doesn't allocate the land to meet even this lower stated level of housing (it is at least 4,675 units short of meeting this figure see objection to policy H1) and 2) of the allocations that have been made many are on the Councils own evidence unviable and in our view undeliverable.
- 1.11 The consequence of these findings are that even to meet the Councils own lower housing figure there will be a need to release land from the Green Belt and this need increases if the minimum level of housing need set by the Standard Method is to be achieved.
- 1.12 It should be noted that because the Council determined as part of the plan making process that Green Belt sites should not be identified a significant number of sites which would otherwise be suitable and deliverable have been omitted from their assessment.

- 1.13 The evidence to support this is in September 2020, the Sheffield Plan Issues and Options document which presented all three options as requiring the reuse of previously developed sites and in addition options 2 and 3 suggested Green Belt release. This was to accommodate only 2,200 dpa.
- 1.14 Green Belt Review 2020 did not conclude that the only site that could be removed from the Green Belt and brought forward for development was Norton Aerodrome (Policy SA6) but in fact concluded:
- “9.1 The Green Belt Review demonstrates that all land within Sheffield’s Green Belt performs Green Belt functions to some degree. Some areas perform more strongly against Green Belt purposes than others.”*
- 1.15 In addition, the Integrated Impact Assessment Report (December 2022) (table 6.1) considered three different options to meeting the 40,000 figure. This included option 3 which incorporated an assessment of a number of Green Belt sites for strategic housing allocations (1,000 dwelling plus). The summary in table 6.1 does not reach the conclusion that release of strategic Green Belt sites should be ruled out as a matter of course and table 7.1 includes number of strategic Green Belt sites.
- 1.16 In paragraph 7.5.13 the IIA concludes in that it has explored in detail a range of Green Belt locations that would reasonable for more detailed investigation for housing development should the need arise in Sheffield. Table 9.1 (page 51) demonstrates that sites could be identified to meet a total of 52,580 dwellings in the plan period which would require the release of some 11,990 dwellings from the green belt.
- 1.17 Action:**
- 1.18 This is not planning positively, nor is it supported by proportionate evidence and it is contrary to the NPPF (paragraphs 60 and 62) as such the plan is unsound.**

Paragraph 3.6

- 1.19 The statement that the release of Green Belt land would potentially jeopardise the regeneration of brownfield land is not supported by any evidence and if this is the justification for the approach adopted then the approach is unsound.
- 1.20 The available evidence in the Whole Plan Viability Tables 10.2a to 10.2f and appendix 18 clearly demonstrate that it is not competition from green field sites that is preventing these sites from coming forward (as there are so few green field sites that have been developed) but that there are systemic viability issues with these sites, a situation made worse by the existing CIL requirement and the proposed affordable housing requirements which render all brownfield sites in the following sub areas unviable:
- City Centre,
 - East and Northeast,
 - Manor / Arbourthorne / Gleadless,
 - Urban West. Stocksbridge / Deepcar,
 - Rural Upper Don Valley, Chapelton / Ecclesfield
- 1.21 The Whole plan viability report states:
- “10.12 Development in the Central Area, when assessed under the methodology set out in the PPG is shown as unviable”.*
- 1.22 It goes onto state that this also applies to greenfield development in certain locations as follows:

“10.43 In these areas (City Centre and East, Northeast, Manor/Abourthorne/Gleadless), both brownfield and greenfield development is unviable, including at minimum policy scenario. The viability evidence suggests a zero affordable housing requirement”.

- 1.23 For the sub Area Urban West, Stocksbridge / Deepcar, Upper Rural Don Valley, Chapeltown / Ecclesfield Area the Whole Plan Viability Report states:

“10.45 As in the City Centre, East and the North East, the viability evidence in Urban West, Stocksbridge / Deepcar, Upper Rural Don Valley and Chapeltown / Ecclesfield Area shows that brownfield development is unviable, including at minimum policy scenario”.

10.46 The viability evidence suggests a zero affordable housing requirement”.

- 1.24 The suggestion that the release of greenfield land will compromise the delivery of unviable sites (which on the councils own evidence cannot be considered to be deliverable in the context of the NPPF) is both contrary to the evidence base of the plan and unsubstantiated.

1.25 Action:

- 1.26 As a justification for not releasing Green Belt sites the suggestion that there needs to be a restriction on green field release is not based on evidence and is unsound.**

Paragraph 3.7

- 1.27 This states that Sheffield is not relying on other local authorities in the city region to meet any of its housing needs however if the city is not to be meet the housing requirement as defined by the Standard Method and have provided no exceptional circumstances to justify an alternative figure then the Council should have engaged the duty to cooperate as required by the NPPF paragraph 25 to 27. In particular paragraph 26 makes it explicit that:

“In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.”

- 1.28 In the circumstances of this Local Plan the Council have clearly failed to engage the Duty to Cooperate this is due to the incorrect approach that has been taken to the overall housing being planned for, as explained in paragraph 3.8 the level of housing provision has been determined by the capacity of the urban areas and the restrictions imposed by the green belt.

- 1.29 In these circumstances where the minimum level of housing as calculated by the Standard Method is not being met (NPPF paragraph 61) then the Council should have raised this issue as part of the Duty to Cooperate prior to the Regulation 19 stage. Failure to do so is a failure in the Councils legal duty under the Localism Act 2011, (as set out in section 33A of the Planning and Compulsory Purchase Act 2004) which places a legal duty on local planning authorities and County Councils in England, and prescribed public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan and marine plan preparation in the context of strategic cross boundary matters.

- 1.30 This is a legal failure and is of such a magnitude that it cannot be rectified by further engagement at this time after the regulation 19 stage the plan should be withdrawn or should be found unsound due to legal noncompliance.

1.31 Action

- 1.32 The Duty to Cooperate (DtC), unlike soundness problems this cannot be remedied once the Plan has been submitted for examination. This is clear from the case of Samuel Smith Old Brewery (Tadcaster) v Selby DC [2015] EWCA Civ 1107 and in particular, paragraphs 38 and 40.**

1.33 The plan is not legally compliant.

Paragraph 3.8

- 1.34 This paragraph explains the approach that the Council have taken to the preparation of the plan and clearly state that the level of housing has been set to reflect what may be accommodated within the existing confines of the city without reviewing the green belt.
- 1.35 In this paragraph nor anywhere else in the plan does the Council state that it is seeking challenge the overall level of housing need as calculated by the Standard Method on the grounds that there are exceptional circumstances.
- 1.36 If the Council are to take a capacity based approach, then there is a clear need to engage the Duty to Cooperate to accommodate unmet need and also demonstrate that they have investigated every possibility to accommodate the level of housing set by the Standard Method.
- 1.37 Further it is noted that the surrounding authorities have in their local plans taken the difficult decision to release Green Belt to meet their own housing and employment needs. It is clear that meeting any unmet need from Sheffield will require these authorities to release additional Green Belt land in their own areas as part of future reviews.
- 1.38 If the engagement of the DtC resulted in neighbouring authorities to releasing further green belt/ green field sites such sites would be in locations which would be further away from the City and less integrated in the City's public transport network. Such releases outside of the City would be contrary to Sheffield Local Plan aims as stated in paragraph 3.6 (also objected to) as they would lead to higher carbon emissions due to the increased need to travel.
- 1.39 Paragraph 3.8 suggests that the level of housing proposed will support the City's growth ambitions as evidenced by the Housing, Economic Growth and Demographic Modelling and the Council's latest Employment Land Review, Employment Land Review Update, Logistics Study and Retail and Leisure Study. This is important in that the Council are not seeking to suggest that the evidence represents exceptional circumstances that justify a lower housing requirement (as required by NPPF paragraph 61) but merely that this lower level of provision will not thwart the Council's economic ambitions.
- 1.40 We note the approach adopted by the Inspector in the Welwyn and Hatfield Local Plan Examination (still ongoing) which also took a capacity based approach to housing provision. The Inspector in that case advised the Green Belt authority (EXAM178 Stage 6 Hearing Roundup Note 6 January 2020) that:
- “Unless there are sound planning reasons for not doing so, in the first instance, the totality of all of the dwellings assumed to be built during the plan period, on sites put forward in the adopted plan, must be capable of meeting, as a minimum, the FOAHN for at least the plan period.”*
- 1.41 In that case the inspector stated that:
- “There is a clear justification for the removal of some sites from the GB on the basis of overall housing need. However, that does not of itself justify the removal of specific individual sites. That should be based on a comparative assessment of all of the suitable and deliverable sites, considered to be available in the GB, as to their contribution to the purposes and openness of the GB and their relative sustainability in the context of the development strategy being promoted through the plan.”*
- 1.42 In the examination the inspector explained that before determining not to meet the housing need it was important “not to leave any stone unturned” and the inspector requested that the Council undertake further work to identify sites to meet the full housing need. These sites

were identified and then examined by the inspector who found that a number would be sound allocations if included in the plan. The reluctance of the Council to allocate the additional sites identified by this process has resulted in the plan remaining at examination.

- 1.43 It is noticeable that Sheffield did not take this approach but determined without reference to their own evidence which includes a review of all Green Belt sites or a review of the proposals that have been submitted as part of the call for sites.
- 1.44 Sheffield's approach is set out in more detail in the Report to Council 14 December 2022 section 1.6.
- 1.45 This approach of using Green Belt as a blanket restriction without reference to a thorough review of the individual opportunities and for Green Belt release and balancing the harm caused by the release of the site (taking into account mitigation) and the benefits is contrary to the NPPF which does allow Green Belt release to meet housing need as this can represent exceptional circumstances (in terms of Local Plan review) as well as Very Special Circumstances (in terms of determining applications and appeals).
- 1.46 NPPF paragraph 32 states that plans should be informed by a sustainability appraisal that meets the relevant legal requirements. The SA should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). The NPPF advises that significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.
- 1.47 Because the Council's approach has been simply to decide not to release Green Belt land for housing (with one exception) there has been no assessment of the impact of selected Green Belt release balanced against the economic, social and environmental benefits of meeting housing need in full.
- 1.48 It is noted that the Green Belt Review did not conclude that the only site that could be removed from the Green Belt and brought forward for development was Norton Aerodrome (Policy SA6) but in fact concluded:
- “9.1 The Green Belt Review demonstrates that all land within Sheffield's Green Belt performs Green Belt functions to some degree. Some areas perform more strongly against Green Belt purposes than others.*
- 9.2 Following consultation on the Sheffield Plan Issues and Options (Reg. 18) in 2020, the next step will be to discern the appropriate spatial strategy to take forward into the Draft Sheffield Plan (Reg. 19). If there is a need to remove some land from the Green Belt for development, and exceptional circumstances can be demonstrated for doing this, then Green Belt land will be considered through the site selection methodology.”*
- 1.49 Notwithstanding the above stating that Green Belt sites will be assessed the 2022 HELAA does not assess the potential of Green Belt sites instead it states:
- “3.13 Sites submitted to the Council between 2009 to March 2022, included land in the Green Belt. These sites have been recorded as known land that is available within the Green Belt for development but have not been included as part of the current supply, because the Green Belt boundary can only be altered through a Local Plan review and exceptional circumstances must be demonstrated to justify any changes. The Sheffield Plan spatial strategy has been developed following a decision made by Members on a cross party basis in early 2022. With the exception of one large previously developed site in the Green Belt, the Local Plan does not propose to release land from the Green Belt for development. Therefore, land in the Green Belt remains in the HELAA database but not within the Local Plan land supply.”*



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For and on behalf of
**Hallam Land Management
Inspired Villages
Limes Developments Limited
Strata Homes (Yorkshire)**

**Sheffield Local Plan
Regulation 19 Consultation**

**Objections to the Local Plan
Policy SP1: Overall Growth Plan**

**Prepared by
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1.0 OBJECTION TO SP1: OVERALL GROWTH PLAN

a) Overall level of housing growth proposed in SP1 a)

i) *The level of housing required by the NPPF and NPPG (the Standard Method)*

1.1 Paragraph 61 of the NPPF requires that strategic policies should be informed by a local housing need assessment, conducted using the Standard Method in national planning guidance – unless exceptional circumstances justify an alternative approach.

1.2 The housing requirement as set by the Standard Method is according to the Five Year Housing Land Supply Monitor 2022 this is 51,306 dwellings (3,018 dpa). This requirement has not been challenged and no exceptional circumstance have been set out in any of the supporting evidence base.

ii) *Are the Council claiming exceptional circumstances?*

1.3 The Council are not seeking to argue that the Plan should not be based on the housing requirement as defined by the Standard Method.

1.4 The decision to the Council to pursue the “capacity based” approach to the housing figure was made by the Cooperative Executive on the 16 February 2022 “Sheffield Local Plan Spatial Options”.

1.5 This advised (paragraph 1.3.3) that Sheffield’s total housing need based on the Standard Method was 53,500 additional homes over the period 2021-2039. (Additional homes needed $(18 \times 2,923/\text{yr}) = 52,614$ Plus replacement allowance $(18 \times 50/\text{yr}) = 900$).

1.6 The report goes onto explain to members the following:

“1.3.4 The housing need figure provides the starting point for setting the housing requirement in the Sheffield Plan. The National Planning Policy Framework states that local plans should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. However, the scale of growth may be restricted where meeting the full need would harm assets identified in the Framework as being of particular importance (e.g., Green Belt and Sites of Special Scientific Interest) or where the adverse effects of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework as a whole. Relevant text from paragraph 11 of the NPPF is quoted in the legal implications section below (see paragraph 4.3.3).”

1.7 It is important to note that neither the report nor the subsequent reports to members regarding the Local Plan including the report to full Council on 14 December 2022 which approved the Local Plan for the regulation 19 consultation highlighted that the need for the Council to demonstrate “exceptional circumstances” where required to depart from the level of need set by the Standard Method. Instead, the officers informed members that the Standard Method was simply the starting point and could be simply be diverged from on the basis of existing Green Belt boundaries.

1.8 This advice was incorrect.

1.9 At no time have the Council considered that there is a need to demonstrate “exceptional circumstances” to depart from the level of housing required by the Standard Method and as a consequence none have been stated.

iii) *The purpose of the Housing, Economic Growth and Demographic Modelling July 2021*

1.10 It should be noted that the purpose of this document was not to argue against the provision of the minimum level of housing as required by the Standard Method but to ensure that the housing requirement in the Local Plan supports the city’s economic aspirations taking into

account the Regional Econometric Model and the latest demographic evidence (HEGD paragraph 1.2).

- 1.11 The report concludes (paragraph 9.14) that there is no reason to exceed the minimum housing requirement set by the Standard Method to meet the economic needs of the city.
- 1.12 It is important to recognise that the HEGD assumes that the level of in commuting as recorded by the 2011 census remains the same so for the whole of the plan period there will be some 63,778 workers will continue to travel into the city from the wider area. The report makes no allowance for Sheffield to become more sustainable by making provision to accommodate more of its workers and so reduce this significant level of in commuting.
- 1.13 In respect of the balance between the employment and housing policies of the city the Employment Land Review Update considered the level of land required to meet both the constrained figure in policy SP1 and the Minimum figure from the Standard Method. It calculated that +224.26ha of land would be required to support the workforce from capacity based housing figure and 242.05ha for the workforce projected from the Standard Method (Table 6.18).
- 1.14 The level of employment land being promoted in Policy SP1 of 282ha over the period of the employment land projections (2018 to 2038 at 12.9ha per year) is actually in excess of both projections.
- 1.15 In terms of consistency between the levels of employment and housing provision the level of employment promoted in SP1 is better aligned with the minimum level of housing as calculated by the Standard Method than the constrained housing figure in SP1.
- iv) *Is it possible to identify suitable and deliverable sites to meet the Standard Method figure?***
- 1.16 While the Integrated Impact Assessment Report (December 2022) started by considering how to accommodate some 40,000 (IIA table 6.1) considered three different options to meeting the 40,000 figure. This included option 3 which incorporated an assessment of a number of Green Belt sites for strategic (1,000 dwelling plus).
- 1.17 The summary in table 6.1 does not reach the conclusion that release of strategic Green Belt sites should be ruled out as a matter of course as table 7.1 includes number of strategic Green Belt sites.
- 1.18 The IIA concludes in paragraph 7.5.13 that it has explored in detail a range of Green Belt locations that could potentially be reasonable for more detailed investigation for housing development should the need arise in Sheffield.
- 1.19 Table 9.1 (page 51) demonstrates that sites could be identified to meet a total of 52,580 dwellings in the plan period which would require the release of some 11,990 dwellings from the green belt.
- 1.20 Paragraph 9.1.11 of the IIA states:
“When considering Green Belt release for the spatial options, consideration is given to the interim IIA work that focused upon the likely effects of development in strategic growth locations in the Green Belt. An assumption is made that the locations considered to be unreasonable options, would not come forward under the growth options that require Green Belt release. The sequence of Green Belt release would be firstly to consider sustainably located brownfield sites (only 270 dwellings have been identified at Norton as suitable in this regard), followed by greenfield sites that are sustainably located (or can be made so). At the highest scale of growth it is presumed that some ‘less sustainable locations’ may need to be involved.”

- 1.21 While this makes reference to “less sustainable” Green Belt locations might need to be allocated this is a matter that should be assessed on a site by site basis. What is central to the objection to the Council’s capacity based approach is that there is evidence which identified that Green Belt sites as a reasonable alternative available to meet the Minimum level of Housing set by the Standard Method.
- v) *Has the Duty to Cooperate been engaged to establish if other authorities could accommodate the unmet need?***
- 1.22 It is important prior to the inspector opening the examination that the question of whether the Council needed to engage in the DtC to assess if the neighbouring authorities could accommodate the unmet need is considered. The unmet need being the difference between the Council’s capacity based housing figure and the minimum level of housing required to meet the Standard Method calculation.
- 1.23 It is our view that because the Council failed to understand that if they underprovided housing compared to the Standard Method without proving exceptional circumstances as to why the figure was inappropriate then the DtC would have to be engaged. The Council have approached the DtC they on the basis that by planning for a capacity based level of housing they are meeting their housing need. This is not the case.
- 1.24 It is accepted that the need to provide exceptional circumstances in order to set a housing need figure lower than the Standard Method has never been highlighted to the members. Without doing this the Housing need remains at the level calculate by the Standard Method and to depart from this the Council should follow the guidance in Paragraph 61 of the NPPF
- 1.25 Having a capacity based housing figure (which is how the Council describe the SP1 figure in paragraph 3.8) requires the Council to have engaged in the Duty to Co-operate to establish if other Councils can accommodate this unmet need.
- 1.26 As highlighted in our object to paragraph 3.7 the Duty to Cooperate (DtC), unlike soundness problems this cannot be remedied once the Plan has been submitted for examination. This is clear from the case of Samuel Smith Old Brewery (Tadcaster) v Selby DC [2015] EWCA Civ 1107 and in particular, paragraphs 38 and 40.
- vi) *Is the Council’s justification for not meeting the minimum housing need for the city sound?***
- 1.27 The Councils reasoning for not meeting the minimum housing need is set out in paragraphs 1.6.21 to 1.6.23 of the Report to Council 14 December 2022. This lists the benefits of meeting the minimum housing requirement as being:
- It provides the opportunity to allocate sites in all market sub-areas of the city.
 - It would deliver a better mix of house types overall – with more family-sized homes.
 - Viability is less of a problem on greenfield sites.
 - It could provide an opportunity to support investment in new rail infrastructure (the Barrow Hill line between Sheffield and Chesterfield, and/or the Upper Don Valley between Sheffield and Stocksbridge);
 - It offers potential to better address employment land constraints, provide jobs/ mixed use development;
 - The amount of housing being provided would be meet the housing need figure calculated using the Government methodology
 - It would offer further potential to provide affordable homes (because greenfield sites are more viable and because more housing is being delivered overall)
- 1.28 The report identifies the main disbenefits of this option include:

- The scale of Green Belt release necessary could seriously harm Sheffield’s reputation as ‘the Outdoor City’
- It is highly likely that harm would be caused to sites of significant landscape value.
- Additional Green Belt land would also be required for employment uses – to ensure that the population and housing growth are aligned.
- There is a significant risk that it could undermine urban regeneration, especially if the demand for new homes fails to materialise (meaning developers are able to concentrate on developing greenfield sites)
- It would lead to more commuting from suburban areas – more pollution and adverse impacts on the net zero carbon target.
- If demand for housing does not materialise, the Housing Delivery Test might not be met – this triggers the ‘tilted balance’ in favour of granting planning applications on unallocated greenfield sites.
- Major infrastructure investment would be needed to make some greenfield sites sustainable (especially transport, health facilities, schools)

1.29 Taking these negative points in turn:

- Reputational damage – by actually planning for some Green Belt/ green field development the Council could actually enhance its reputation as the “Outdoor City” by creating modern highly sustainable new neighbourhoods which deliver high levels of open space and Biodiversity Net Gain. Conversely reputational damage is being caused by young families not being able to meet their need for affordable family market housing in the city and having to move out, the woeful provision of affordable housing and the inability for the elderly population to move into Extra Care accommodation. It should be noted that claimed reputational damage is far from demonstrating exceptional circumstances required by NPPF paragraph 61.
- The claim that meeting the minimum level of housing is likely to cause harm to sites of significant landscape value is unsubstantiated by the evidence base. The Preliminary Landscape Character Assessment (LCA) does not identify any “sites of significant landscape value”. The LCA identified the main character areas and types within the Sheffield Green Belt Area to provide a tool for Planning officers in assessing the proposals submitted by objectors to the draft SDF City Policies and Sites document to reallocate Green Belt Countryside Areas for housing or other developments (LDA page 7). The field studies for the Addendum were carried out in summer 2022 appendix 1 appraises just 32 sites and only finds one to have a low/no capacity for growth. While the addendum does not seek to review all potential Green Belt releases submitted thorough the call for sites the fact that, in landscape terms neither document suggest that there exist overriding landscape reasons not to release some of the Green Belt land assessed.
- The claim that additional Green Belt land would also be required for additional employment development to ensure that the employment and housing growth are aligned is not supported by evidence.
 - There is very strong evidence that the strategy will not actually deliver the level of housing suggested and as such Green Belt sites might be required just to support the lower level of growth projected.
 - This statement is not supported by the evidence base.
 - The Employment Land Review Update 2021 (ELR table 6.13 page 52) calculates that meeting SCR policy on (Capacity restrained housing) B Class floorspace would require some 114.89 hectares of employment land while providing jobs to meet the population generated by the Standard Method

- (minimum level housing) would require 132.69 hectares of employment land. Both these figures are below the level of employment land that is being promoted in Policy SP1 of 12.9ha per year (282ha over the plan period).
- Even making an allowance for a further 5 years of employment land after 2038 and the loss of employment land Table 6.18 still only suggests that some 242.05ha required to make provision for the Standard Method population assuming Census levels of in commuting (its lower at 231.28ha for 1:1 commuting). Again this is below the level being provided by SP1.
 - In terms of the increase in stock required the Policy On approach would require a 24% increase in stock while the Standard Method would require between 25 and 26% increase in stock.
 - The ELR (page 63 paragraph 7.7) recommended that Sheffield City's employment land OAN should be in the range between 176 ha (Labour Supply Scenario 6b, Issues/Options 1:1 commuting) and 242 ha (Labour Supply Scenario 5a, Standard Method Census commuting) up to 2038.
 - This point should be discounted as it is supported by the evidence.
- The objection to releasing Green Belt land that it represents a significant risk that it could undermine urban regeneration is again unsubstantiated.
 - As highlighted in our objection to paragraph 3.6 the available evidence in the Whole Plan Viability Tables 10.2a to 10.2f and appendix 18 demonstrate that it is not competition from green field sites that is preventing these sites from coming forward but that there are systemic viability issues with these sites, a situation made worse by the existing CIL requirement and the proposed affordable housing requirements which render all brownfield sites in the following sub areas unviable: City Centre, East and North East, Manor / Arbourthorne / Gleadless, Urban West. Stocksbridge / Deepcar, Rural Upper Don Valley, Chapeltown / Ecclesfield.
 - In addition it should be recognised that the type and tenure of accommodation that is to be provided in the City Centre Sub Area is significantly different to that which would be provided on Green Belt sites. Delivery in the City Centre Sub Area has been (and will be) very much focused on private rented apartments whereas Green Belt sites will deliver family homes. This means the alternative location for developers seeking to meet Sheffield unmet need for family housing are actually Green Belt sites in the surrounding local authorities.
 - The assertion that releasing Green Belt sites for family housing would lead to more commuting from suburban areas thereby increasing pollution and having adverse impacts on the net zero carbon target is also unsubstantiated by evidence.
 - There is no evidence that supports this assertion its based upon the inaccurate assumption that families that are excluded from family home ownership on Green Belt sites in Sheffield will instead choose to take up residence in rented apartments in the city centre. As employers in Sheffield City centre this is not our companies experience, our experience is that those staff members who wish to purchase family housing tend to seek this type and tenure of housing outside of the city if they cannot secure second hand stock within the city.
 - This experience is supported by evidence from the 2011 census which shows that there are some 63,776 people who already commute into the city to work. It should be noted that the Housing, Economic Growth and Demographic Modelling does not seek to influence this existing pattern of commuting by

providing additional accommodation which could allow some of those 63,776 persons who commute into the city to actually live in the city and commute a shorter distance.

- Providing for some of the 63,776 workers who commute across the city’s boundaries to work each day the opportunity to live in a modern sustainable family home closer to their work and on public transport routes who assist rather than detract from meeting objectives around zero carbon and pollution.

Chart 1: Commuting pattern into Sheffield 2011 census



- The suggestion that the minimum housing target should not be met on the basis that demand for housing may not materialise, and such the Housing Delivery Test might trigger the ‘tilted balance’ is not a reason to not to meet the minimum level of housing. It should be noted that in our analysis the City are likely to fail the HDT and/or the 5 year land supply test at some point in the near future even if the plan is adopted as drafted because it has not allocated deliverable site or sites that are capable of delivery in the next five years. If this was a real concern the Council would have made different allocations to allow for all of the market to be met rather than allocating sites that just meet a limited sector of the market in terms of tenure, type and location of dwellings.
- It is alleged that some greenfield sites might require infrastructure investment to make these locations sustainable in terms of transport, health facilities, and schools. Unlike the Sub Areas where the strategy concentrates the majority of development the majority of Green Belt sites are in areas which will not only be able to deliver CIL and affordable housing but is also likely to be able to fund other infrastructure. This is especially the case if the Plan allocates strategic sites. Furthermore smaller Green Belt sites can be very close to existing services as these are not all concentrated in the city centre.

vii) Will the sites allocated to meet the housing figure in SP1 deliver over the plan period and will there be a five year land supply on the date of adoption?

- 1.30 Contrary to the guidance the council have failed to provide a housing trajectory.
- 1.31 In accordance with national policy, a satisfactory housing delivery trajectory that clearly demonstrates that the sites proposed for development, when considered as a whole, will be capable of maintaining a five-year supply of housing land throughout the plan period, should be submitted. The requirement for the first five years should include the appropriate buffer. To demonstrate this the Council will need to provide evidence that all of the sites included in policies Ca1 to SA9 are developable and deliverable within the timescales suggested in the trajectory.
- 1.32 The trajectory should be based on robust evidence and clearly capable of accommodating slippage in site development or delivery failure. In accordance with national policy, the trajectory should also demonstrate that the under-delivery in the plan years prior to adoption can be confidently made up in the first five years post adoption.
- 1.33 The 5-Year Housing Land Supply Monitoring Report (December 2022) identifies (Table 4) a 5-year deliverable supply of 3.63 years.
- 1.34 This is based upon the Standard Method minimum housing requirement of 3,016 dwellings (page 5).
- 1.35 This report does not provide evidence on whether there will be a five year supply on the date of adoption (which at best would be 2024/5).
- 1.36 At present the plan is unsound as it does not demonstrate how the capacity based housing figure will result in 5 year land supply at the date of adoption.
- 1.37 NPPG (Paragraph: 004 Reference ID: 68-004-20190722) requires that:
“In plan-making, strategic policies should identify a 5 year housing land supply from the intended date of adoption of the plan.”

1.38 Action:

1.39 The plan has not been positively prepared, nor is it supported by proportionate evidence, and it is contrary to the NPPF (paragraphs 60 and 62) as such the plan is unsound.

1.40 SP1 Policy Change required:

- a) Delete 35,350 new homes and replace with “a minimum of 51,272 net dwellings (3,016 dwellings per annum from 2022 to 2039)”
- b) Delete allocations as objected to and replace with deliverable site as set out in our other objections (remove 4.750 large site Windfall, remove those sites from C1 to CA6 and S2 to S9 which are unsound)

b) Objection to SP1 b) 12.9ha of employment land

- 1.41 In respect of the balance between the employment and housing policies of the city the Employment Land Review Update considered the level of land required to meet both the constrained figure in policy SP1 and the minimum figure from the Standard Method and calculated that these would need between +224.26 for the constrained housing figure and 242.05ha and assuming Census levels of in commuting (its lower at 231.28ha for 1:1 commuting) (Table 6.18). The level of employment land being promoted in Policy SP1 of 282ha over the same period (12.9ha per year for 2018 to 2038) is actually in excess of both projections.
- 1.42 In terms of consistency between the levels of employment and housing provision the level of employment promoted in SP1 is better aligned with the minimum level of housing as

calculated by the Standard Method.

1.43 The plan provides no explanation as to why the level of provision is higher than that which would be required to meet the employment needs of the population resulting from the Standard Method.

1.44 It is noted that previously the Council have resisted planning for the level of housing required by the Standard Method on the basis that it would require further Green Belt release for employment land. The above evidence is that this is not the case.

1.45 Action:

1.46 The employment and housing policies of the plan are misaligned, and the evidence appears to contradict the justification given for the Strategic policies. As such at the employment requirement is unjustified.

c) Objection to SP1 c) number of allocations

1.47 As presently drafted the number of allocations is incorrect as many of the allocations are not deliverable on the Councils own evidence.

1.48 In addition, and in line with the objection to SP1 additional Green Belt sites are required to be allocated to meet the minimum housing requirement as set by the Standard Method.

1.49 The number of allocations should be amended to reflect our objection to sites in policies CA1 to SA9 requiring their deletion and also reflect the number of replacement sites that are required. It should also be increased to reflect the new site that are required to meet the minimum level of housing need.

1.50 Action:

1.51 Policy Change required:

a) Update number of allocations to reflect our objections to C1 to CA6 and S2 to S9

d) Objection to SP1 e) objection to the broad areas of growth

1.52 The strategic policies do not provide a clear strategy for bringing sufficient land forward, at a sufficient rate, to address objectively assessed needs over the plan period.

1.53 Board locations are not identified on the Proposals Map reliance on this non designated area and the assumed housing delivery associated with these locations are unsound and both should be deleted from the plan policies.

1.54 The broad locations for development are not indicated on a key diagram and reference to such locations is not in accordance with paragraph 22 of the NPPF.

1.55 NPPF paragraph 23 requires that strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or nonstrategic policies).

1.56 In addition, NPPF paragraph 23 requires councils to have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

a) specific, deliverable sites for years one to five of the plan period; and

b) specific, developable sites or broad locations for growth, for years 6-10 and, where

possible, for years 11-15 of the plan

- 1.57 The IIA demonstrates that it is possible to identify specific sites to meet the minimum housing requirement as set by the Standard Method. As highlighted by our objection to the IIA the approach taken does not allow for the contribution that could be made from smaller non-strategic sites released from the Green Belt which could increase further the selection of sustainable and deliverable sites.
- 1.58 These unidentified broad areas of growth have not been subject to the sustainability assessment (IIA does not refer to them) .
- 1.59 While the HELAA refers to broad areas of growth there is no indication as to their location or the level of likely completions.
- 1.60 Action**
- 1.61 Policy Change required:**
- a) Delete reference to broad areas of growth.
- e) Objection to SP1 h) the removal of former Norton Aerodrome from the Green Belt and the continued projection of existing Green Belt boundaries**
- 1.62 While Norton Aerodrome is identified as a site to be removed from the green belt the proposals map actually makes a total of 47 changes to the Green Belt boundary. This is a comprehensive review of the green belt and as should be undertaken in accordance with national policy including the need to ensure that the boundaries will endure beyond the end of the plan period.
- 1.63 The Sheffield Green Belt was established in 1938, to the south and west of the city. A formal Green Belt plan was not produced by the City Council until 1980 which following a public inquiry, the plan became operative in late 1983.
- 1.64 The 1998 UDP only made two small changes to the earlier Green Belt boundary.
- 1.65 At present the Green Belt of South and West Yorkshire comprises over 248,000 hectares
- 1.66 There has been no substantive changes to the Sheffield Green Belt for a considerable period of time, however it should be noted that in 1998 the development pressures were very different to those that exist today.
- 1.67 The Unitary Development Plan (UDP) was adopted in 1998. The plan period was from 1991 to 2001 and the plan allocated land for 10,700 dwellings to be completed in the period 1991-2001 (10 years) i.e., 1,070 dpa (Page 145 UDP policy H1). This was based upon the Regional Planning Guidance Note (RPG5) 1989 paragraph 12 and appendix (UDP page 145 side bar). The figure took account the 1991 Census results and the mid 1992 based household formation rates for Sheffield.
- 1.68 The context for the UDP policies was the expectation that the number of people living in Sheffield was expected to fall from 529,300 in 1991 to around 523,400 by 2001 a decrease in population of just over 1% (page 144). This is an increase in population of 10.5% from 529,300 in the UDP for 1991.
- 1.69 The UDP policies were based upon the need to continue to provide new housing because:
- a) on average each home will be occupied by fewer people than before
- b) some houses and flats are reaching the end of their useful life and need to be replaced.
- c) a lot of existing housing does not meet the needs of many groups of people.
- 1.70 The UDP states that the Secretary of State for the Environment regarded the retention of the extensive area of Green Belts overriding and limiting the scope for meeting housing demand

within the District at that time.

- 1.71 The evidence and the policy background to the UDP is far out of date. The amount of land it allocated for development is not capable of meeting current needs. This means that the detailed policy boundaries are out of date and in need of urgent revision.
- 1.72 The absence of allocations in a development plan since 1998 has meant that the Council's response to the housing crisis has been through the exercise of Development Management decisions, the outcome of which is set out in our objections including our objection to SP2. This highlights that delivery has been concentrated both within a very limited location around the City Centre and within two specific housing types these being 1 and 2 bed apartments and Student cluster flats. The present situation is summarised below:
- 1.73 The 2009 Core Strategy only proposed one adjustment to the Green Belt boundary at Sheffield Airport. Again, the background to this approach was a housing requirement based upon:
- a) Regional Spatial Strategy
 - b) Stepped requirement Policy CS 22 of 1,025 dpa 2004/05 to 2007/08 (4 years) then 1,425 dpa 2008/09 to 2025/26 (18 years) and an average of 1,353 dpa. This is under half (42%) of the requirement under the new Standard Method.
 - c) The adoption of a City Sites and Policy plan which was to contain allocations to meet the housing requirement and never materialised.
- 1.74 The Council have not produced a plan that designates new housing allocations since 1998, over 25 years ago.
- 1.75 It is over a decade since the Council adopted any development plan.
- 1.76 The inner boundaries of the Green Belt have not been subject to any meaningful change since they were adopted in 1983.
- 1.77 The present situation is significantly different both in policy terms and in terms of development needs from when the Green Belt boundaries were first set, the situation is also very different from when they were considered in 1998 in particular:
- a) The housing need is substantially increased, and Sheffield is no longer planning for a falling population.
 - b) The current Green Belt boundaries will prevent the minimum level of housing being provided (contrary to NPPF paragraph 61)
 - c) The current Green Belt will also prevent the delivery of a range of housing to meet the needs of the whole population as it concentrates development in locations where delivery is in the form of apartments and usually rented. In particular the resulting Strategy significantly under provides family housing, chronically underdelivers affordable housing and makes no provision for older persons specialist accommodation (see our objections to SP2, NC3, NC4 and H1).
 - d) The NPPF provides exceptionally for the review of Green Belt boundaries (paragraph 140), and the need to meet housing need is such an exception, as is the need to provide affordable housing and the provision of older persons accommodation is also capable of being an exceptional circumstance.
 - e) In reviewing Green Belts, the need to provide sustainable patterns of development is also a consideration (NPPF paragraph 141) and such a review could seek to accommodate some of the 63,774 commuters who travel into the city.
 - f) Various Council documents have not only accepted that meeting housing needs can be exceptional circumstances, but these documents have also assessed the potential

of Green Belt sites to be release to meet the minimum level of housing as required by the paragraph 61 of the NPPF.

- g) This evidence does not conclude that there is or should be a capacity based approach to the provision of housing.

1.78 The situation is also different in that the Council have in the process of developing the current plan there have been a number of reports that have considered the potential for Green Belt release these include:

- a) Citywide Growth Options November 2015 (CD3.11)
- i) The Council consulted on the ‘Citywide Options for Growth to 2034’ document in 2015. This sought view on how the Council could plan to meet between 40,000 and 46,000 homes between 2014 and 2034. This contained 5 options for development although as the table 4 on page 70 illustrates, even cumulatively none of these cascading options would deliver the 46,000 homes at the top of the range:
 - ii) Option A: Urban Capacity – this would only deliver 19,300 homes.
 - iii) Option B: Urban Intensification – this would deliver an additional 12,750 homes and a cumulative total of 32,050 homes.
 - iv) Option C: Urban Remodelling– this would deliver an additional 4,300 homes and a cumulative total of 36,350 homes.
 - v) Option D: Limited number of Larger Urban Extensions into Green Belt– this would deliver an additional 6,100 homes and 42,450 homes.
 - vi) Option E: Multiple Smaller Green Belt Releases– this would deliver an additional 550 homes and 43,000 homes.
- b) In September 2020, the Sheffield Plan Issues and Options document presented all three options as requiring the reuse of previously developed sites and in addition options 2 and 3 suggest Green Belt release. This was to accommodate 2,200 dpa.
- c) The Green Belt Review 2020 did not conclude that the only site that could be removed from the Green Belt and brought forward for development was Norton Aerodrome (Policy SA6) but in fact concluded:
- “9.1 The Green Belt Review demonstrates that all land within Sheffield’s Green Belt performs Green Belt functions to some degree. Some areas perform more strongly against Green Belt purposes than others.”*
- d) The Integrated Impact Assessment Report (December 2022) (table 6.1) considered three different options to meeting the 40.000 figure. This included option 3 which incorporated an assessment of a number of Green Belt sites for strategic (1,000 dwelling plus). The summary in table 6.1 does not reach the conclusion that release of strategic Green Belt sites should be ruled out as a matter of course as table 7.1 includes number of strategic Green Belt sites. In paragraph 7.5.13 the IIA concludes in that it has explored in detail a range of Green Belt locations that could potentially be reasonable for more detailed investigation for housing development should the need arise in Sheffield. Table 9.1 (page 51) demonstrates that sites could be identified to meet a total of 52,580 dwellings in the plan period which would require the release of some 11,990 dwellings from the green belt.

1.79 The purpose of reviewing albeit briefly these reports is that they clearly highlight that there are a range of Green Belt sites that have previously been considered reasonable alternatives (i.e. suitable and deliverable) which could be allocated to meet the minimum level of housing need.

- 1.80 In terms of the IIA it is appropriate to note that this only considered the release of strategic sites from the Green Belt but there is the potential to release smaller sites from the Green Belt which would be no less sustainable in terms of their relationship to services, facilities and public transport routes than some of the employment areas that the Council are encouraging to be redeveloped for housing. The inclusion of these smaller sites would increase the choice from which the Council could select suitable and deliverable sites to meet the housing need.
- 1.81 In passing it is worth noting that the approach of setting a minimum size level for Green Belt release in terms of only large sites being suitable was found unsound by the inspector at the St Albans Local Plan examination.
- 1.82 The removal of a single site from the Green Belt is considered unsound for the following reasons:
- a) There are clearly exceptional circumstances, recognised in the Councils earlier documents, which justify a wider review of the green belt, these include;
 - i) meeting the minimum level of housing need (NPPF paragraph 61)
 - ii) making provision for different groups in the community by provide the appropriate range of accommodation in terms of the size, type and tenure of housing including those who require affordable housing, families with children, and older people (paragraph 62)
 - iii) Securing sustainable patterns of development including providing the opportunity for some of the 63,774 commuters who are projected to travel into the city each year for the next 20 years to move into the city (NPPF Paragraph 142).
 - iv) To provide a level of housing commensurate with the proposed level of employment land provision.
 - b) The exceptional circumstances for the release of Norton Aerodrome site have not been demonstrated. The proposed allocation is considered unsound for the following reasons:
 - i) Paragraphs 4.68 to 4.70 of the Local Plan make no reference to the site or exceptional circumstances and so provide no justification for its release. As such the proposed allocation is unsound as it is not justified or in accordance with national policy.
 - ii) Although a previously developed site much of it is now open and its elevated position on the southern side of Sheffield means that it will have a visual impact on the openness of the green belt.
 - iii) In respect on the impact on the functions of the Green Belt there are other sites with similar impact on Green Belt functions that can also deliver much needed family market housing, affordable housing and specialist housing to meet the Councils unmet need and therefore represent reasonable alternatives that should also be considered in determining whether the minimum level of housing should be accommodated by the plan.
 - iv) The proposed allocation does not set out ways in which the impact of removing this land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land (NPPF paragraph 142). It is noted that other potential Green Belt releases can achieve this requirement.
 - v) It is contrary to NPPF paragraph 143 a) in that it does not result in consistency with the development plan's strategy for meeting identified and the



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RTPI

Chartered Town Planner



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, Grace Clarkson, Stuart Garnett and Marcus Jolly
Organisation (if applicable): Hallam Land Management, Strata Homes, Inspired Villages and Lime Developments Limited
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

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.



Strategic Planning Research Unit
A specialist team within DLP Planning Ltd

For and on behalf of
**Hallam Land Management
Inspired Villages
Limes Developments Limited
Strata Homes (Yorkshire)**

**Sheffield Local Plan
Regulation 19 Consultation**

**Objections to the Local Plan
Policy SP2: Spatial Strategy (parts a, b, c, e and h)**

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

February 2023



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1.0 OBJECTION TO POLICY SP2 SPATIAL STRATEGY

1.1 The proposed strategy of concentrating a below minimum level of housing into existing urban areas and primarily in former industrial areas in the city centre sub area is unsound for the following reasons:

a) The Whole Plan Viability Assessment identifies that most of the proposed allocations as being unviable.

1.2 As will be demonstrated below and by our objections to individual allocations the strategy concentrates development in allocations which are unviable, have considerable levels of constraints and on sites which have considerable other issues with delivery.

1.3 The table on the next pages applies the viability results from the Whole Plan Viability Assessment to the allocations and this highlights that most are unviable.

1.4 Just removing those proposed allocation which the Whole Plan viability Assessment defines as being unviable would reduce the deliverable site significantly and the likely contribution from the proposed allocations from a total of 27,229 to just 2,703 dwellings.

1.5 This is because the Council have allocated sites in locations and with a scale of development which the evidence in the Whole Plan Viability Assessment suggests will be unviable. The number of dwellings on sites identified that are unviable on the Council's evidence is some 24,526. While each site will of course have its own circumstances but for these allocation to be sound the Council will need to demonstrate that they are capable of being delivered, if they are to be included in the five year land supply from the date of adoption or at least deliverable within the plan period.

1.6 Action:

1.7 At present the evidence available for these sites is that they are unviable and not deliverable and as such would be unsound to include in the plan.

b) The viability issues identified in the Whole Plan Viability Assessment highlight that few sites will deliver affordable housing.

1.8 The City has a very poor record in terms of increasing its stock of social housing.

1.9 Evidence from 2009 onward suggest that there have been significant net losses of just almost 2,000 in the last 10 years.

1.10 Since 2018 the start date of the SHMA there has been an undersupply of affordable housing of 3,331 dwellings.

1.11 The need for affordable housing in the city is both immediate and critical as demonstrated by the table on the next page.

Table 1. Past rates of net stock change by tenure

	Local Authority (incl. owned by other LAs)	Housing associatio n	Other public sector	Private sector (R) ¹	Total (R) ¹
2009	42,153	16,927	155	175,211	234,446
2010	41,802	16,880	155	177,290	236,127
2011	41,652	16,978	155	178,026	236,811
2012	41,366	16,867	155	178,856	237,244
2013	41,059	17,188	98	179,660	238,005
2014	40,733	17,235	94	180,860	238,922
2015	40,383	17,568	78	182,658	240,687
2016	40,195	17,637	75	184,369	242,276
2017	39,930	17,763	75	186,756	244,524
2018	39,559	17,854	71	189,344	246,828
2019	39,260	17,897	63	191,584	248,804
2020	38,989	17,870	63	194,965	251,887
2021	38,877	17,911	71	196,878	253,737

	Local Authority (incl. owned by other LAs)	Housing associatio n	Other public sector	Private sector (R) ¹	Total (R) ¹
2009/10	-351	-47	0	2,079	1,681
2010/11	-150	98	0	737	685
2011/12	-286	-111	0	830	433
2012/13	-307	321	-57	804	761
2013/14	-326	47	-4	1,200	917
2014/15	-350	333	-16	1,798	1,765
2015/16	-188	69	-3	1,711	1,589
2016/17	-265	126	0	2,387	2,248
2017/18	-371	91	-4	2,588	2,304
2018/19	-299	43	-8	2,240	1,976
2019/20	-271	-27	0	3,381	3,083
2020/21	-112	41	8	1,913	1,850
10 yr Average 2011 to 2021	-278	93	-8	1,885	1,693
Total for 10 years	-2,775	933	-84	18,852	16,926
Net Affordable			-1,926		
2019 SHMA			902		
Shortfall average 10 years			1,095		
Shortfall from 2018 base date of SHMA			-3,331		

- 1.12 The table on the next pages also applies the viability results from the whole plan viability assessment to the allocations and this highlights that most are unviable and only a few will deliver affordable housing.
- 1.13 As a result of the above the strategy will only deliver some 808 affordable dwellings from the proposed allocations. This is an average of 48 dpa.
- 1.14 This falls significantly short of the need in the SMHA of 902 dpa. The likely level of affordable housing that will be delivered from the chosen strategy is according to the Councils own evidence less than a single year's requirement.
- 1.15 Action:**
- 1.16 The plan has not been positively prepared, nor is it supported by proportionate evidence, and it is contrary to the NPPF paragraph 60 and 62 as such the plan is unsound.**
- c) The strategy over concentrates development in a single location which results in an under delivery of family homes and specialist accommodation.**
- 1.17 This issue is set out in full after the table on the next pages.

Table 2. Viability assessment of proposed allocations from the Whole Plan Viability Assessment

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	Affordable delivery - Policy Compliant	Affordable delivery with developer contribution
CA1					
KN03	191	2743	Not Viable	19	0
KN04	200		Not Viable	20	0
KN05	132		Not Viable	13	0
KN06	114		Not Viable	11	0
KN07	98		Not Viable	10	0
KN08	96		Not Viable	10	0
KN09	96		Not Viable	10	0
KN10	90		Not Viable	9	0
KN11	87		Not Viable	9	0
KN12	86		Not Viable	9	0
KN13	93		Not Viable	9	0
KN14	75		Not Viable	8	0
KN15	50		Not Viable	5	0
KN16	62		Not Viable	6	0
KN17	61		Not Viable	6	0
KN18	60		Not Viable	6	0
KN19	60		Not Viable	6	0
KN20	54		Not Viable	5	0
KN21	33		Not Viable	3	0
KN22	50		Not Viable	5	0
KN23	50		Not Viable	5	0
KN24	60		Not Viable	6	0
KN25	45		Not Viable	5	0
KN26	44		Not Viable	4	0
KN27	28		Not Viable	3	0
KN28	35		Not Viable	4	0

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	Affordable delivery - Policy Compliant	Affordable delivery with developer contribution
KN29	23		Not Viable	2	0
KN30	30		Not Viable	3	0
KN31	18		Not Viable	2	0
KN32	15		Not Viable	2	0
KN33	13		Not Viable	1	0
KN34	12		Not Viable	1	0
KN35	10		Not Viable	1	0
KN36	572		Not Viable	57	0
CA2		1849			
CW03	368		Not Viable	37	0
CW04	75		Not Viable	8	0
CW05	56		Not Viable	6	0
CW06	19		Not Viable	2	0
CW07	5		Not Viable		0
CW08	3		Not Viable		0
CW09	336		Not Viable	34	0
CW10	268		Not Viable	27	0
CW11	206		Not Viable	21	0
CW12	94		Not Viable	9	0
CW13	83		Not Viable	8	0
CW14	65		Not Viable	7	0
CW15	46		Not Viable	5	0
CW16	43		Not Viable	4	0
CW17	77		Not Viable	8	0
CW18	28		Not Viable	3	0
CW19	16		Not Viable	2	0
CW20	16		Not Viable	2	0
CW21	16		Not Viable	2	0

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	Affordable delivery - Policy Compliant	Affordable delivery with developer contribution
CW22	15		Not Viable	2	0
CW23	14		Not Viable	1	0
CA3		3998			
SU02	32		Not Viable	3	0
SU03	500		Not Viable	50	0
SU04	355		Not Viable	36	0
SU05	116		Not Viable	12	0
SU06	100		Not Viable	10	0
SU07	284		Not Viable	28	0
SU08	225		Not Viable	23	0
SU09	229		Not Viable	23	0
SU10	34		Not Viable	3	0
SU11	118		Not Viable	12	0
SU12	216		Not Viable	22	0
SU13	120		Not Viable	12	0
SU14	118		Not Viable	12	0
SU15	27		Not Viable	3	0
SU16	93		Not Viable	9	0
SU17	88		Not Viable	9	0
SU18	85		Not Viable	9	0
SU19	84		Not Viable	8	0
SU20	61		Not Viable	6	0
SU21	58		Not Viable	6	0
SU22	58		Not Viable	6	0
SU23	56		Not Viable	6	0
SU24	48		Not Viable	5	0
SU25	48		Not Viable	5	0
SU26	45		Not Viable	5	0

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	Affordable delivery - Policy Compliant	Affordable delivery with developer contribution
SU27	23		Not Viable	2	0
SU28	43		Not Viable	4	0
SU29	47		Not Viable	5	0
SU30	22		Not Viable	2	0
SU31	39		Not Viable	4	0
SU32	39		Not Viable	4	0
SU33	38		Not Viable	4	0
SU34	77		Not Viable	8	0
SU35	20		Not Viable	2	0
SU36	20		Not Viable	2	0
SU37	61		Not Viable	6	0
SU38	29		Not Viable	3	0
SU39	46		Not Viable	5	0
SU40	26		Not Viable	3	0
SU41	25		Not Viable	3	0
SU42	57		Not Viable	6	0
SU43	17		Not Viable	2	0
SU44	22		Not Viable	2	0
SU45	21		Not Viable	2	0
SU46	21		Not Viable	2	0
SU47	10		Not Viable	1	0
SU48	20		Not Viable	2	0
SU49	18		Not Viable	2	0
SU50	18		Not Viable	2	0
SU51	17		Not Viable	2	0
SU52	13		Not Viable	1	0
SU53	11		Not Viable	1	0
CA4		2101			

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	Affordable delivery - Policy Compliant	Affordable delivery with developer contribution	
SV04	303	6095	Not Viable	30	0	
SV05	42		Not Viable	4	0	
SV06	335		Not Viable	34	0	
SV07	149		Not Viable	15	0	
SV08	121		Not Viable	12	0	
SV09	117		Not Viable	12	0	
SV10	108		Not Viable	11	0	
SV11	102		Not Viable	10	0	
SV12	100		Not Viable	10	0	
SV13	96		Not Viable	10	0	
SV14	95		Not Viable	10	0	
SV15	89		Not Viable	9	0	
SV16	85		Not Viable	9	0	
SV17	75		Not Viable	8	0	
SV18	66		Not Viable	7	0	
SV19	58		Not Viable	6	0	
SV20	42		Not Viable	4	0	
SV21	40		Not Viable	4	0	
SV22	30		Not Viable	3	0	
SV23	22		Not Viable	2	0	
SV24	16		Not Viable	2	0	
SV25	10		Not Viable	1	0	
CA5						
HC03	1006		6095	Not Viable	101	0
HC04	100			Not Viable	10	0
HC05	52	Not Viable		5	0	
HC06	9	Not Viable			0	
HC07	1230	Not Viable		123	0	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	Affordable delivery - Policy Compliant	Affordable delivery with developer contribution
HC08	714		Not Viable	71	0
HC09	410		Not Viable	41	0
HC10	364		Not Viable	36	0
HC11	364		Not Viable	36	0
HC12	298		Not Viable	30	0
HC13	213		Not Viable	21	0
HC14	162		Not Viable	16	0
HC15	136		Not Viable	14	0
HC16	135		Not Viable	14	0
HC17	135		Not Viable	14	0
HC18	101		Not Viable	10	0
HC19	97		Not Viable	10	0
HC20	95		Not Viable	10	0
HC21	93		Not Viable	9	0
HC22	92		Not Viable	9	0
HC23	77		Not Viable	8	0
HC24	46		Not Viable	5	0
HC25	45		Not Viable	5	0
HC26	45		Not Viable	5	0
HC27	30		Not Viable	3	0
HC28	22		Not Viable	2	0
HC29	12		Not Viable	1	0
HC30	12		Not Viable	1	0
CA6					
LR01	466		Not Viable	47	0
LR02	367	1495	Not Viable	37	0
LR03	336		Not Viable	34	0
LR04	111		Not Viable	11	0

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	Affordable delivery - Policy Compliant	Affordable delivery with developer contribution
LR05	84	1005	Not Viable	8	0
LR06	61		Not Viable	6	0
LR07	56		Not Viable	6	0
LR08	14		Not Viable	1	0
SA2					
NWS08	13	1005	Viable range £0 - £20,000	4	4
NWS09	311		Viable range £0 - £20,000	93	93
NWS10	169		Viable range £0 - £20,000	51	51
NWS11	77		Viable range £0 - £20,000	23	23
NWS12	76		Viable range £0 - £20,000	23	23
NWS13	63		Viable range £0 - £20,000	19	19
NWS14	48		Viable range £0 - £20,000	14	14
NWS15	41		Viable range £0 - £20,000	12	12
NWS16	32		Viable range £0 - £20,000	10	10
NWS17	23		Viable range £0 - £20,000	7	7
NWS18	22		Viable range £0 - £20,000	7	7
NWS19	19		Viable range £0 - £20,000	6	6
NWS20	14		Viable range £0 - £20,000	4	4
NWS21	14		Viable range £0 - £20,000	4	4
NWS22	14		Viable range £0 - £20,000	4	4
NWS23	13		Viable range £0 - £20,000	4	4
NWS24	13		Viable range £0 - £20,000	4	4
NWS25	12		Viable range £0 - £20,000	4	4
NWS26	11		Viable range £0 - £20,000	3	3
NWS27	10		Viable range £0 - £20,000	3	3
NWS28	10	Viable range £0 - £20,000	3	3	
SA3		801			
NES09	53		Not Viable	5	0

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	Affordable delivery - Policy Compliant	Affordable delivery with developer contribution
NES10	32		Not Viable	3	0
NES11	88		Not Viable	9	0
NES12	73		Not Viable	7	0
NES13	68		Not Viable	7	0
NES14	44		Not Viable	4	0
NES15	33		Not Viable	3	0
NES16	32		Not Viable	3	0
NES17	29		Not Viable	3	0
NES18	24		Not Viable	2	0
NES19	24		Not Viable	2	0
NES20	24		Not Viable	2	0
NES21	23		Not Viable	2	0
NES22	21		Not Viable	2	0
NES23	20		Not Viable	2	0
NES24	20		Not Viable	2	0
NES25	20		Not Viable	2	0
NES26	20		Not Viable	2	0
NES27	19		Not Viable	2	0
NES28	19		Not Viable	2	0
NES29	19		Not Viable	2	0
NES30	19		Not Viable	2	0
NES31	18		Not Viable	2	0
NES32	17		Not Viable	2	0
NES33	16		Not Viable	2	0
NES34	14		Not Viable	1	0
NES35	12		Not Viable	1	0
SA4		2899			
ES20	80		Not Viable	8	0

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	Affordable delivery - Policy Compliant	Affordable delivery with developer contribution
ES21	28		Not Viable	3	0
ES22	596		Not Viable	60	0
ES23	371		Not Viable	37	0
ES24	210		Not Viable	21	0
ES25	147		Not Viable	15	0
ES26	121		Not Viable	12	0
ES27	120		Not Viable	12	0
ES28	116		Not Viable	12	0
ES29	101		Not Viable	10	0
ES30	98		Not Viable	10	0
ES31	93		Not Viable	9	0
ES32	93		Not Viable	9	0
ES33	82		Not Viable	8	0
ES34	68		Not Viable	7	0
ES35	63		Not Viable	6	0
ES36	48		Not Viable	5	0
ES37	47		Not Viable	5	0
ES38	46		Not Viable	5	0
ES39	42		Not Viable	4	0
ES40	41		Not Viable	4	0
ES41	39		Not Viable	4	0
ES42	37		Not Viable	4	0
ES43	35		Not Viable	4	0
ES44	28		Not Viable	3	0
ES45	26		Not Viable	3	0
ES46	24		Not Viable	2	0
ES47	17		Not Viable	2	0
ES48	17		Not Viable	2	0

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	Affordable delivery - Policy Compliant	Affordable delivery with developer contribution
ES49	16	1607	Not Viable	2	0
ES50	16		Not Viable	2	0
ES51	12		Not Viable	1	0
ES52	11		Not Viable	1	0
ES53	10		Not Viable	1	0
SA5					
SES08	272	1607	Not Viable	27	0
SES09	218		Not Viable	22	0
SES10	151		Not Viable	15	0
SES11	151		Not Viable	15	0
SES12	90		Not Viable	9	0
SES13	75		Not Viable	8	0
SES14	74		Not Viable	7	0
SES15	50		Not Viable	5	0
SES16	34		Not Viable	3	0
SES17	31		Not Viable	3	0
SES18	28		Not Viable	3	0
SES19	27		Not Viable	3	0
SES20	27		Not Viable	3	0
SES21	26		Not Viable	3	0
SES22	21		Not Viable	2	0
SES23	20		Not Viable	2	0
SES24	19		Not Viable	2	0
SES25	14		Not Viable	1	0
SES26	11		Not Viable	1	0
SES27	10		Not Viable	1	0
SES28	258	Not Viable	26	0	
SA6		760			

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	Affordable delivery - Policy Compliant	Affordable delivery with developer contribution
SS01	52	938	Viable range £0 - £20,000	16	16
SS02	45		Viable range £0 - £20,000	14	14
SS03	44		Viable range £0 - £20,000	13	13
SS04	37		Viable range £0 - £20,000	11	11
SS05	33		Viable range £0 - £20,000	10	10
SS06	30		Viable range £0 - £20,000	9	9
SS07	28		Viable range £0 - £20,000	8	8
SS08	26		Viable range £0 - £20,000	8	8
SS09	22		Viable range £0 - £20,000	7	7
SS10	17		Viable range £0 - £20,000	5	5
SS11	14		Viable range £0 - £20,000	4	4
SS12	14		Viable range £0 - £20,000	4	4
SS13	14		Viable range £0 - £20,000	4	4
SS14	12		Viable range £0 - £20,000	4	4
SS15	11		Viable range £0 - £20,000	3	3
SS16	10		Viable range £0 - £20,000	3	3
SS17	270		Viable range £0 - £20,000	81	81
SS18	81		Viable range £0 - £20,000	24	24
SA7					
SWS01	15	938	Viable range £0 - £20,000	5	5
SWS02	369		Viable range £0 - £20,000	111	111
SWS03	184		Viable range £0 - £20,000	55	55
SWS04	60		Viable range £0 - £20,000	18	18
SWS05	59		Viable range £0 - £20,000	18	18
SWS06	43		Viable range £0 - £20,000	13	13
SWS07	39		Viable range £0 - £20,000	12	12
SWS08	38		Viable range £0 - £20,000	11	11
SWS09	27		Viable range £0 - £20,000	8	8

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	Affordable delivery - Policy Compliant	Affordable delivery with developer contribution
SWS10	14		Viable range £0 - £20,000	4	4
SWS11	14		Viable range £0 - £20,000	4	4
SWS12	14		Viable range £0 - £20,000	4	4
SWS13	14		Viable range £0 - £20,000	4	4
SWS14	13		Viable range £0 - £20,000	4	4
SWS15	13		Viable range £0 - £20,000	4	4
SWS16	12		Viable range £0 - £20,000	4	4
SWS17	10		Viable range £0 - £20,000	3	
SA8		914			
SD02	428		Not Viable	43	0
SD03	190		Not Viable	19	0
SD05	85		Not Viable	9	0
SD06	55		Not Viable	6	0
SD07	34		Not Viable	3	0
SD08	33		Not Viable	3	0
SD09	33		Not Viable	3	0
SD10	18		Not Viable	2	0
SD11	14		Not Viable	1	0
SD12	14		Not Viable	1	0
SD13	10		Not Viable	1	0
SA9			24		
CH01	14	Not Viable		1	0
CH02	10	Not Viable	1	0	
	27,229	27229		3262	808
Not viable	24,526				
Viable	2,703				

d) **The strategy over concentrates development in a single location which results in an under delivery of family homes, affordable homes and specialist accommodation and does not provide for the range of housing contrary to NPPF paragraph 62.**

1.18 The proposed strategy is in effect just a continuance of what has been occurring within the city in the last two decades despite the zoning in the 1998 UPD.

1.19 The results of this strategy are therefore known and easy to predict by considering the past pattern of provision.

1.20 The table below illustrates the levels of recorded gross dwelling completions in Sheffield as set out in SCC Housing Completions Report (August 2019) and Fact and Figures Documents.

1.21 Over the last 5 years 75% of all dwellings delivered in the city were apartments or student clusters only 25% of the supply were traditional houses.

Table 3. Gross Completions in Sheffield by Housing Type (2015-2020)

	Apartments, maisonettes, student cluster flats		Houses and bungalows		Total
	Gross completions	%	Gross completions	%	Gross completions
2015/16	1,253	77%	368	23%	1,621
2016/17	1,825	74%	633	26%	2,458
2017/18	1,727	72%	659	28%	2,386
2018/19	1,388	69%	612	31%	2,000
2019/20	2,430	78%	671	22%	3,101
Total	8,623	75%	2,943	25%	11,566

Source: HELAA and Site Schedule 2020

1.22 Over the last 5 years only 11% of all dwellings delivered were 3 bed houses (just 241 dpa) and just 8% of all completions were 4+ bed houses (177 dpa).

1.23 In respect of the nature of existing demand the Councils SHMA 2019 Table 8.1 suggest that the majority of households (80%) are wishing to access houses rather than apartments (20%) as shown in the table below.

Table 4. Demand for Dwellings by size, type and tenure

	Sheffield	Dwellings
Overall Housing requirement		2200
Dwelling Size		
One bed	12%	264
Two bed	27%	594
Three bed	45%	990
Four + bed	16%	352
Dwelling type		
Flats / apartments	20%	440
Terraced	18%	396
Semi- detached	35%	770
Detached	31%	682
Tenure		
Owner occupation	67%	1474
Social rented / affordable rent	18%	396
Private rented / other rent	15%	330

Source: SHMA 2019 Table 8.1

- 1.24 Comparing the past delivery of dwellings with the demand for dwelling by size and type in the SHMA 2019 suggests that there has been an oversupply of apartments and a under supply of dwellings.
- 1.25 The table below shows that not only are completions dominated by apartments and student cluster flats but that these completions are also concentrated in just two locations City Centre and City Centre West.

Table 5. Location of completions by SHMA Housing Market Areas 2015 - 2020

HMA	House	Apartment	Student Cluster	Total
	2015-2020			
Chapelton/Ecclesfield	0%	0%	0%	1%
City Centre	1%	20%	23%	44%
City Centre West	1%	13%	12%	26%
East	1%	0%	0%	1%
Manor/Arbourthorne/ Gleadless	7%	1%	0%	8%
North East	4%	1%	0%	5%
North West	1%	1%	0%	2%
Peak District National Park*	1%	0%	0%	1%
Rural upper Don Valley	0%	0%	0%	0%
South	2%	1%	0%	2%
South East	4%	1%	0%	5%
South West	2%	1%	0%	3%
Stocksbridge and Deepcar	1%	0%	0%	1%
Total	25.45%	39.97%	34.58%	100%

Source: SHMA 2019

- 1.26 The future supply over the next five years also demonstrates similar characteristics to the recent past supply with only 18% of the projected supply are known to be houses a further 10% being delivered on the Council's brownfield land are presently without plans or planning

permission but are assumed to be delivering houses. This leaves the majority of the future supply (72%) over the next five years comprising of apartments (43%) and student cluster flats (24%) as shown on in the table below.

Table 6. Breakdown of 5 year supply by type of dwelling

	SCC 2020/21 to 2025/26	%
Apartments / maisonettes	4,897	43%
Student cluster flats	2,763	24%
Houses and bungalows	2,033	18%
Student cluster flats and Apartments	132	1%
Houses and bungalows and Apartments	421	4%
Brownfield Sites Assumed to be houses	1,135	10%
Total	11,381	100%

Source: HELAA 2020 (where no dwelling type identified assumption is that it will deliver housing not apartments or Student accommodation)

- 1.27 In conclusion in the last 5 years, new supply has a predominance (74%) of apartments and purpose-built student accommodation, with 'traditional' houses making up just 26% of gross completions. Over the last five years, three quarters of all dwellings completed were apartments, maisonettes (43%) or student cluster flats (32%).
- 1.28 This is against a demand for 80% housing and 20% apartments.
- 1.29 There is also a locational concentration of completions with 70% of completions occurring within just two of the SHMA Market Areas of City and City Urban West.
- 1.30 Both the Council's report and our analysis highlight the mismatch between locational and typological needs and supply. Put simply the supply that exists for the next 5 years, as well as the delivery that has taken place, is very largely of the wrong type and in the wrong place.
- 1.31 The distribution of allocation in the Plan continues this concentration and as such very similar types and tenure of property are likely to be delivered as have in the past in these locations. The table below highlight the distribution of allocations in the plan as per SP2.

Table 7. Distribution of allocations.

	Total	Percentage
CA1	2743	11%
CA2	1849	7%
CA3	3998	16%
CA4	2101	8%
CA5	6095	24%
CA6	1495	6%
SA2	1005	4%
SA3	801	3%
SA4	2899	11%
SA5	1607	6%
SA6	760	3%
Total	25353	100%

- 1.32 The table above demonstrates that the Council have not identified allocations to meet the need for family housing, affordable housing or older persons housing but are continuing their previous approach which has resulted in recent past provision and future supply being largely restricted to locations in the City Centre and City Centre West, predominantly for student accommodation and one and two bed apartments.
- 1.33 The proposed distribution of future allocations as described in SP2 and illustrated in the table above will continue to promote development in locations City Centre and City Centre West which will predominantly deliver apartments and student clusters leaving a considerable level of unmet need for family, affordable and specialist housing for older persons.
- 1.34 The table below compares the likely output of the allocations based on the nature of past delivery which reflect the approach proposed SP2 and compares these to the expressed housing needs for different dwelling types as set out in the SHMA 2019. This highlights that the approach in SP2 is likely to lead a significant over supply of apartments, maisonettes, student cluster flats and a significant undersupply of houses and bungalows.

Table 8. Implications of policy SP2

	Total	Apartments, maisonettes, student cluster flats	Houses and bungalows
Percentage of past provision	100%	75%	25%
Future Allocations	27,229	20,422	6,807
Percentage of demand	100%	20%	80%
Capacity based housing figure	35,530	7,106	28,424
Minimum Housing Need	51,272	10,254	41,018
Shortfall			
Capacity based housing figure	-	13,316	-21,617
Minimum Housing Need	-	10,167	-34,210

Source: SHMA 2019

- 1.35 The resulting pattern of development from policy SP2 it will not reflect the needs of different groups in particular those seeking family accommodation.
- e) The need for and supply of specialist older persons housing**
- 1.36 While the SHMA 2019 attempted to quantify the type and tenure of dwelling as illustrated above it did not quantify the need for older persons housing. This calculation has been undertaken using the “Older Persons Housing Need Model”¹ and is reported in full in our objection to NC4 but this highlights a net need for almost 2,000 market dwellings for older persons housing with care and an additional 6,000 purpose built older persons dwellings.
- 1.37 Our objection to NC4 also highlights the very low level of provision of market housing with care that presently exists in the City.
- 1.38 In these circumstances the release of family housing that will be achieved by the residents of the application “rightsizing” is a legitimate material consideration for the decision maker capable of attracting significant weight.
- 1.39 Action:**
- 1.40 Change first sentence of SP2 as follows:**
- 1.41 ~~The majority of~~ Future growth will be focused on previously developed sites within or**

¹ https://www.dlpconsultants.co.uk/wp-content/uploads/2022/04/DLP-SPRU_Older_Person_Housing_Need_Research.pdf



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RTPI

Chartered Town Planner



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, Grace Clarkson, Stuart Garnett and Marcus Jolly
Organisation (if applicable): Hallam Land Management, Strata Homes, Inspired Villages and Lime Developments Limited
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: 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
Inspired Villages
Limes Developments Limited
Strata Homes (Yorkshire)**

**Sheffield Local Plan
Regulation 19 Consultation**

Objection to Policy CA1

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

February 2023



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

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1.0 OBJECTIONS TO ALLOCATIONS IN POLICY CA1 ON GROUNDS OF VIABILITY

- 1.1 The Whole Plan Viability Assessment identifies the proposed allocations in policies CA1 to CA6 and SA 3,4, 5, 8 AND 9 as being unviable.
- 1.2 The table on the next pages applies the viability results from the Whole Plan Viability Assessment to the allocations and this highlights that allocations within these policies are unviable.
- 1.3 While each site will of course have its own circumstances and for these allocations to be sound the council will need to demonstrate that they are capable of being delivered, if they are to be included in the five year land supply from the date of adoption or at least deliverable within the plan period.
- 1.4 At present the evidence available for these sites is that they are unviable and not deliverable and as such it would be unsound to include these sites within the plan.

Table 1. Viability assessment of proposed allocations from the Whole Plan Viability Assessment

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
CA1			
KN03	191	2743	Not Viable
KN04	200		Not Viable
KN05	132		Not Viable
KN06	114		Not Viable
KN07	98		Not Viable
KN08	96		Not Viable
KN09	96		Not Viable
KN10	90		Not Viable
KN11	87		Not Viable
KN12	86		Not Viable
KN13	93		Not Viable
KN14	75		Not Viable
KN15	50		Not Viable
KN16	62		Not Viable
KN17	61		Not Viable
KN18	60		Not Viable
KN19	60		Not Viable
KN20	54		Not Viable
KN21	33		Not Viable
KN22	50		Not Viable
KN23	50		Not Viable
KN24	60		Not Viable
KN25	45		Not Viable
KN26	44		Not Viable
KN27	28		Not Viable
KN28	35		Not Viable
KN29	23		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
KN30	30		Not Viable
KN31	18		Not Viable
KN32	15		Not Viable
KN33	13		Not Viable
KN34	12		Not Viable
KN35	10		Not Viable
KN36	572		Not Viable
CA2			
CW03	368	1849	Not Viable
CW04	75		Not Viable
CW05	56		Not Viable
CW06	19		Not Viable
CW07	5		Not Viable
CW08	3		Not Viable
CW09	336		Not Viable
CW10	268		Not Viable
CW11	206		Not Viable
CW12	94		Not Viable
CW13	83		Not Viable
CW14	65		Not Viable
CW15	46		Not Viable
CW16	43		Not Viable
CW17	77		Not Viable
CW18	28		Not Viable
CW19	16		Not Viable
CW20	16		Not Viable
CW21	16		Not Viable
CW22	15		Not Viable
CW23	14		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
CA3			
SU02	32	3998	Not Viable
SU03	500		Not Viable
SU04	355		Not Viable
SU05	116		Not Viable
SU06	100		Not Viable
SU07	284		Not Viable
SU08	225		Not Viable
SU09	229		Not Viable
SU10	34		Not Viable
SU11	118		Not Viable
SU12	216		Not Viable
SU13	120		Not Viable
SU14	118		Not Viable
SU15	27		Not Viable
SU16	93		Not Viable
SU17	88		Not Viable
SU18	85		Not Viable
SU19	84		Not Viable
SU20	61		Not Viable
SU21	58		Not Viable
SU22	58		Not Viable
SU23	56		Not Viable
SU24	48		Not Viable
SU25	48		Not Viable
SU26	45		Not Viable
SU27	23		Not Viable
SU28	43		Not Viable
SU29	47		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SU30	22	2101	Not Viable	
SU31	39		Not Viable	
SU32	39		Not Viable	
SU33	38		Not Viable	
SU34	77		Not Viable	
SU35	20		Not Viable	
SU36	20		Not Viable	
SU37	61		Not Viable	
SU38	29		Not Viable	
SU39	46		Not Viable	
SU40	26		Not Viable	
SU41	25		Not Viable	
SU42	57		Not Viable	
SU43	17		Not Viable	
SU44	22		Not Viable	
SU45	21		Not Viable	
SU46	21		Not Viable	
SU47	10		Not Viable	
SU48	20		Not Viable	
SU49	18		Not Viable	
SU50	18		Not Viable	
SU51	17		Not Viable	
SU52	13		Not Viable	
SU53	11		Not Viable	
CA4				
SV04	303		2101	Not Viable
SV05	42		2101	Not Viable
SV06	335		2101	Not Viable
SV07	149		2101	Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SV08	121	6095	Not Viable	
SV09	117		Not Viable	
SV10	108		Not Viable	
SV11	102		Not Viable	
SV12	100		Not Viable	
SV13	96		Not Viable	
SV14	95		Not Viable	
SV15	89		Not Viable	
SV16	85		Not Viable	
SV17	75		Not Viable	
SV18	66		Not Viable	
SV19	58		Not Viable	
SV20	42		Not Viable	
SV21	40		Not Viable	
SV22	30		Not Viable	
SV23	22		Not Viable	
SV24	16		Not Viable	
SV25	10		Not Viable	
CA5				
HC03	1006		6095	Not Viable
HC04	100		6095	Not Viable
HC05	52		6095	Not Viable
HC06	9		6095	Not Viable
HC07	1230		6095	Not Viable
HC08	714		6095	Not Viable
HC09	410	6095	Not Viable	
HC10	364	6095	Not Viable	
HC11	364	6095	Not Viable	
HC12	298	6095	Not Viable	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
HC13	213		Not Viable	
HC14	162		Not Viable	
HC15	136		Not Viable	
HC16	135		Not Viable	
HC17	135		Not Viable	
HC18	101		Not Viable	
HC19	97		Not Viable	
HC20	95		Not Viable	
HC21	93		Not Viable	
HC22	92		Not Viable	
HC23	77		Not Viable	
HC24	46		Not Viable	
HC25	45		Not Viable	
HC26	45		Not Viable	
HC27	30		Not Viable	
HC28	22		Not Viable	
HC29	12		Not Viable	
HC30	12		Not Viable	
CA6				
LR01	466		1495	Not Viable
LR02	367	Not Viable		
LR03	336	Not Viable		
LR04	111	Not Viable		
LR05	84	Not Viable		
LR06	61	Not Viable		
LR07	56	Not Viable		
LR08	14	Not Viable		
SA2		1005		
NWS08	13		Viable range £0 - £20,000	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
NWS09	311	801	Viable range £0 - £20,000	
NWS10	169		Viable range £0 - £20,000	
NWS11	77		Viable range £0 - £20,000	
NWS12	76		Viable range £0 - £20,000	
NWS13	63		Viable range £0 - £20,000	
NWS14	48		Viable range £0 - £20,000	
NWS15	41		Viable range £0 - £20,000	
NWS16	32		Viable range £0 - £20,000	
NWS17	23		Viable range £0 - £20,000	
NWS18	22		Viable range £0 - £20,000	
NWS19	19		Viable range £0 - £20,000	
NWS20	14		Viable range £0 - £20,000	
NWS21	14		Viable range £0 - £20,000	
NWS22	14		Viable range £0 - £20,000	
NWS23	13		Viable range £0 - £20,000	
NWS24	13		Viable range £0 - £20,000	
NWS25	12		Viable range £0 - £20,000	
NWS26	11		Viable range £0 - £20,000	
NWS27	10		Viable range £0 - £20,000	
NWS28	10		Viable range £0 - £20,000	
SA3				
NES09	53			Not Viable
NES10	32			Not Viable
NES11	88			Not Viable
NES12	73			Not Viable
NES13	68			Not Viable
NES14	44			Not Viable
NES15	33			Not Viable
NES16	32		Not Viable	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
NES17	29		Not Viable
NES18	24		Not Viable
NES19	24		Not Viable
NES20	24		Not Viable
NES21	23		Not Viable
NES22	21		Not Viable
NES23	20		Not Viable
NES24	20		Not Viable
NES25	20		Not Viable
NES26	20		Not Viable
NES27	19		Not Viable
NES28	19		Not Viable
NES29	19		Not Viable
NES30	19		Not Viable
NES31	18		Not Viable
NES32	17		Not Viable
NES33	16		Not Viable
NES34	14		Not Viable
NES35	12		Not Viable
SA4			2899
ES20	80	Not Viable	
ES21	28	Not Viable	
ES22	596	Not Viable	
ES23	371	Not Viable	
ES24	210	Not Viable	
ES25	147	Not Viable	
ES26	121	Not Viable	
ES27	120	Not Viable	
ES28	116	Not Viable	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
ES29	101		Not Viable	
ES30	98		Not Viable	
ES31	93		Not Viable	
ES32	93		Not Viable	
ES33	82		Not Viable	
ES34	68		Not Viable	
ES35	63		Not Viable	
ES36	48		Not Viable	
ES37	47		Not Viable	
ES38	46		Not Viable	
ES39	42		Not Viable	
ES40	41		Not Viable	
ES41	39		Not Viable	
ES42	37		Not Viable	
ES43	35		Not Viable	
ES44	28		Not Viable	
ES45	26		Not Viable	
ES46	24		Not Viable	
ES47	17		Not Viable	
ES48	17		Not Viable	
ES49	16		Not Viable	
ES50	16		Not Viable	
ES51	12		Not Viable	
ES52	11		Not Viable	
ES53	10		Not Viable	
SA5			1607	
SES08	272			Not Viable
SES09	218			Not Viable
SES10	151	Not Viable		

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SES11	151	760	Not Viable	
SES12	90		Not Viable	
SES13	75		Not Viable	
SES14	74		Not Viable	
SES15	50		Not Viable	
SES16	34		Not Viable	
SES17	31		Not Viable	
SES18	28		Not Viable	
SES19	27		Not Viable	
SES20	27		Not Viable	
SES21	26		Not Viable	
SES22	21		Not Viable	
SES23	20		Not Viable	
SES24	19		Not Viable	
SES25	14		Not Viable	
SES26	11		Not Viable	
SES27	10		Not Viable	
SES28	258		Not Viable	
SA6				
SS01	52			Viable range £0 - £20,000
SS02	45			Viable range £0 - £20,000
SS03	44			Viable range £0 - £20,000
SS04	37			Viable range £0 - £20,000
SS05	33			Viable range £0 - £20,000
SS06	30			Viable range £0 - £20,000
SS07	28			Viable range £0 - £20,000
SS08	26			Viable range £0 - £20,000
SS09	22			Viable range £0 - £20,000
SS10	17		Viable range £0 - £20,000	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
SS11	14		Viable range £0 - £20,000
SS12	14		Viable range £0 - £20,000
SS13	14		Viable range £0 - £20,000
SS14	12		Viable range £0 - £20,000
SS15	11		Viable range £0 - £20,000
SS16	10		Viable range £0 - £20,000
SS17	270		Viable range £0 - £20,000
SS18	81		Viable range £0 - £20,000
SA7		938	
SWS01	15		Viable range £0 - £20,000
SWS02	369		Viable range £0 - £20,000
SWS03	184		Viable range £0 - £20,000
SWS04	60		Viable range £0 - £20,000
SWS05	59		Viable range £0 - £20,000
SWS06	43		Viable range £0 - £20,000
SWS07	39		Viable range £0 - £20,000
SWS08	38		Viable range £0 - £20,000
SWS09	27		Viable range £0 - £20,000
SWS10	14		Viable range £0 - £20,000
SWS11	14		Viable range £0 - £20,000
SWS12	14		Viable range £0 - £20,000
SWS13	14		Viable range £0 - £20,000
SWS14	13		Viable range £0 - £20,000
SWS15	13		Viable range £0 - £20,000
SWS16	12		Viable range £0 - £20,000
SWS17	10	Viable range £0 - £20,000	
SA8		914	
SD02	428		Not Viable
SD03	190		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SD05	85		Not Viable	
SD06	55		Not Viable	
SD07	34		Not Viable	
SD08	33		Not Viable	
SD09	33		Not Viable	
SD10	18		Not Viable	
SD11	14		Not Viable	
SD12	14		Not Viable	
SD13	10		Not Viable	
SA9			24	
CH01	14			Not Viable
CH02	10			Not Viable
	27,229		27229	
Not viable	24,526			
Viable	2,703			

2.0 OBJECTION TO POLICY CA1

a) **Site Reference: KN04 Address: Land at Russell Street and Bowling Green Street, S3 8RW**

- 2.1 Total housing capacity: 200 Homes
- 2.2 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.3 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.4 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.5 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.6 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.7 Part of the site is within 1 in 100 probability (including climate change allowance) of flooding should not be developed, which reduces the developable area.
- 2.8 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.9 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.10 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.11 Action: Delete Allocation.

b) Site Reference: KN05 Address: Former Canon Brewery, Rutland Road, S3 8DP 132 Homes

- 2.13 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.14 The site is a Level 2 Strategic Flood Risk Assessment (SFRA) and is not deliverable until it passes an exception test.
- 2.15 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.16 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.17 The requirement for open space increases costs and reduces the development area.
- 2.18 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.19 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.20 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.21 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.22 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.23 Action: Delete Allocation.

c) Site Reference: Buildings at Penistone Road, Dixon Street and Cornish Street, S3 8DQ: 98 Homes

- 2.25 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.26 The site is a Level 2 Strategic Flood Risk Assessment (SFRA) and is not deliverable until it passes an exception test.
- 2.27 The area of 1:25 probability (including climate change allowance) of flooding should not be developed and reduces the site size.
- 2.28 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.29 The requirement for a buffer increases costs and reduces the development area.
- 2.30 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.31 The council consider it necessary to have detailed Heritage Statement that explains how potential impacts have been addressed is required. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.32 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.33 The retention of non-heritage assets adds costs and increased uncertainty to the development of the site.
- 2.34 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.35 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.36 Action: Delete Allocation.

d) Sheffield Community Transport, Montgomery Terrace Road, S6 3BU: 96Homes

- 2.37 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.38 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.39 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.40 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.41 Action: Delete Allocation.

e) Site Reference: KN10 Address: 300-310 Shalesmoor, S3 8UL: 32 Homes

- 2.42 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.43 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.44 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.45 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.46 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.47 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.48 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.49 Action: Delete Allocation.

f) Site Reference: KN11 Address: Safestore Self Storage, S3 8RW: 87 Homes

- 2.50 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.51 The site is a Level 2 Strategic Flood Risk Assessment (SFRA) and is not deliverable until it passes an exception test.
- 2.52 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.53 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.54 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.55 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.56 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.57 Action: Delete Allocation.

g) Site Reference: KN13 Address: Warehouse, Boyland Street, S3 8AS: 93 Homes

- 2.58 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.59 The site is a Level 2 Strategic Flood Risk Assessment (SFRA) and is not deliverable until it passes an exception test.
- 2.60 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.61 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.62 This site is identified as impacting on a Heritage Asset and the conversation area which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.63 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.64 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.65 Action: Delete Allocation.

- h) Site Reference: KN18 Address: Buildings at Rutland Road and Rugby Street, S3 9PP
60 Homes**
- 2.66 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.67 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.68 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.69 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.70 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.71 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.72 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.73 Action: Delete Allocation.

i) Site Reference: KN19 Address: 100 Harvest Lane, S3 8EQ 60 Homes

- 2.74 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.75 The site is a Level 2 Strategic Flood Risk Assessment (SFRA) and is not deliverable until it passes an exception test.
- 2.76 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.77 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.78 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.79 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.80 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.81 Action: Delete Allocation.

j) Site Reference: KN20 Address: Buildings at Gilpin Street, S6 3BL: 54 Homes

- 2.82 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.83 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.84 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.85 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.86 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.87 Action: Delete Allocation.

k) Site Reference: KN21 Address: Globe Works, Penistone Road, S6 3AE 33 Homes

- 2.88 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.89 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.90 The requirement for open space increases costs and reduces the development area.
- 2.91 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.92 The council consider it necessary to have a Heritage Statement. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.93 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.94 The requirement to retain the listed building on site is a substantial unknown cost.
- 2.95 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.96 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.97 Action: Delete Allocation.

**I) Site Reference: KN22 Address: Moorfields Flats, Shalesmoor and Ward Street, S3 8UH
50 Homes**

- 2.98 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.99 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.100 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.101 Action: Delete Allocation.

**m) Site Reference: KN25 Address: Land at Mowbray Street and Pitsmoor Road, S3 8EQ
45 Homes**

- 2.102 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.103 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.104 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.105 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.106 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.107 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.108 Action: Delete Allocation.

n) Site Reference: KN29 Address: Land at Montgomery Terrace Road and Penistone Road, S6 3BW 23 Homes

- 2.109 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.110 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.111 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.112 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.113 Action: Delete Allocation.

o) Site Reference: KN30 Address: Land at Hicks Street and Rutland Road, S3 8BD 30 Homes

- 2.114 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.115 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.116 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.117 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.118 Action: Delete Allocation.

p) Site Reference: KN32 Address: Land at Acorn Street, S3 8UR 15 Homes

- 2.119 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.120 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.121 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.122 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.123 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.124 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.125 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.126 Action: Delete Allocation.

q) Site Reference: KN33 Address: 284 Shalesmoor, S3 8UL 13 Homes

- 2.127 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.128 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.129 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.130 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.131 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.132 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.133 Action: Delete Allocation.

r) Site Reference: KN34 Address: 132 Rugby Street, S3 9PP 12 Homes

- 2.134 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.135 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.136 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.137 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.138 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.139 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.140 Action: Delete Allocation.

s) Site Reference: KN35 Address: 132 Rugby Street, S3 9PP 10 Homes

- 2.141 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.142 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.143 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.144 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.145 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.146 Action: Delete Allocation.



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RTPI

Chartered Town Planner



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, Grace Clarkson, Stuart Garnett and Marcus Jolly
Organisation (if applicable): Hallam Land Management, Strata Homes, Inspired Villages and Lime Developments Limited
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: CA1

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.



Strategic Planning Research Unit
A specialist team within DLP Planning Ltd

For and on behalf of
**Hallam Land Management
Inspired Villages
Limes Developments Limited
Strata Homes (Yorkshire)**

**Sheffield Local Plan
Regulation 19 Consultation**

Objection to Policy CA2

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

February 2023



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

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1.0 OBJECTIONS TO ALLOCATIONS IN POLICY CA2 ON GROUNDS OF VIABILITY

- 1.1 The Whole Plan Viability Assessment identifies the proposed allocations in policies CA1 to CA6 and SA 3,4, 5, 8 AND 9 as being unviable.
- 1.2 The table on the next pages applies the viability results from the Whole Plan Viability Assessment to the allocations and this highlights that allocations within these policies are unviable.
- 1.3 While each site will of course have its own circumstances and for these allocations to be sound the council will need to demonstrate that they are capable of being delivered, if they are to be included in the five year land supply from the date of adoption or at least deliverable within the plan period.
- 1.4 At present the evidence available for all the sites allocated in Policy CA2 is that they are unviable and not deliverable and as such it would be unsound to include these sites within the plan.

Table 1. Viability assessment of proposed allocations from the Whole Plan Viability Assessment

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
CA1			
KN03	191	2743	Not Viable
KN04	200		Not Viable
KN05	132		Not Viable
KN06	114		Not Viable
KN07	98		Not Viable
KN08	96		Not Viable
KN09	96		Not Viable
KN10	90		Not Viable
KN11	87		Not Viable
KN12	86		Not Viable
KN13	93		Not Viable
KN14	75		Not Viable
KN15	50		Not Viable
KN16	62		Not Viable
KN17	61		Not Viable
KN18	60		Not Viable
KN19	60		Not Viable
KN20	54		Not Viable
KN21	33		Not Viable
KN22	50		Not Viable
KN23	50		Not Viable
KN24	60		Not Viable
KN25	45		Not Viable
KN26	44		Not Viable
KN27	28		Not Viable
KN28	35		Not Viable
KN29	23		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
KN30	30		Not Viable
KN31	18		Not Viable
KN32	15		Not Viable
KN33	13		Not Viable
KN34	12		Not Viable
KN35	10		Not Viable
KN36	572		Not Viable
CA2			
CW03	368	1849	Not Viable
CW04	75		Not Viable
CW05	56		Not Viable
CW06	19		Not Viable
CW07	5		Not Viable
CW08	3		Not Viable
CW09	336		Not Viable
CW10	268		Not Viable
CW11	206		Not Viable
CW12	94		Not Viable
CW13	83		Not Viable
CW14	65		Not Viable
CW15	46		Not Viable
CW16	43		Not Viable
CW17	77		Not Viable
CW18	28		Not Viable
CW19	16		Not Viable
CW20	16		Not Viable
CW21	16		Not Viable
CW22	15		Not Viable
CW23	14		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
CA3			
SU02	32	3998	Not Viable
SU03	500		Not Viable
SU04	355		Not Viable
SU05	116		Not Viable
SU06	100		Not Viable
SU07	284		Not Viable
SU08	225		Not Viable
SU09	229		Not Viable
SU10	34		Not Viable
SU11	118		Not Viable
SU12	216		Not Viable
SU13	120		Not Viable
SU14	118		Not Viable
SU15	27		Not Viable
SU16	93		Not Viable
SU17	88		Not Viable
SU18	85		Not Viable
SU19	84		Not Viable
SU20	61		Not Viable
SU21	58		Not Viable
SU22	58		Not Viable
SU23	56		Not Viable
SU24	48		Not Viable
SU25	48		Not Viable
SU26	45		Not Viable
SU27	23		Not Viable
SU28	43		Not Viable
SU29	47		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SU30	22	2101	Not Viable	
SU31	39		Not Viable	
SU32	39		Not Viable	
SU33	38		Not Viable	
SU34	77		Not Viable	
SU35	20		Not Viable	
SU36	20		Not Viable	
SU37	61		Not Viable	
SU38	29		Not Viable	
SU39	46		Not Viable	
SU40	26		Not Viable	
SU41	25		Not Viable	
SU42	57		Not Viable	
SU43	17		Not Viable	
SU44	22		Not Viable	
SU45	21		Not Viable	
SU46	21		Not Viable	
SU47	10		Not Viable	
SU48	20		Not Viable	
SU49	18		Not Viable	
SU50	18		Not Viable	
SU51	17		Not Viable	
SU52	13		Not Viable	
SU53	11		Not Viable	
CA4				
SV04	303		2101	Not Viable
SV05	42		2101	Not Viable
SV06	335		2101	Not Viable
SV07	149		2101	Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SV08	121	6095	Not Viable	
SV09	117		Not Viable	
SV10	108		Not Viable	
SV11	102		Not Viable	
SV12	100		Not Viable	
SV13	96		Not Viable	
SV14	95		Not Viable	
SV15	89		Not Viable	
SV16	85		Not Viable	
SV17	75		Not Viable	
SV18	66		Not Viable	
SV19	58		Not Viable	
SV20	42		Not Viable	
SV21	40		Not Viable	
SV22	30		Not Viable	
SV23	22		Not Viable	
SV24	16		Not Viable	
SV25	10		Not Viable	
CA5				
HC03	1006		6095	Not Viable
HC04	100		6095	Not Viable
HC05	52		6095	Not Viable
HC06	9		6095	Not Viable
HC07	1230		6095	Not Viable
HC08	714		6095	Not Viable
HC09	410	6095	Not Viable	
HC10	364	6095	Not Viable	
HC11	364	6095	Not Viable	
HC12	298	6095	Not Viable	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
HC13	213		Not Viable	
HC14	162		Not Viable	
HC15	136		Not Viable	
HC16	135		Not Viable	
HC17	135		Not Viable	
HC18	101		Not Viable	
HC19	97		Not Viable	
HC20	95		Not Viable	
HC21	93		Not Viable	
HC22	92		Not Viable	
HC23	77		Not Viable	
HC24	46		Not Viable	
HC25	45		Not Viable	
HC26	45		Not Viable	
HC27	30		Not Viable	
HC28	22		Not Viable	
HC29	12		Not Viable	
HC30	12		Not Viable	
CA6				
LR01	466		1495	Not Viable
LR02	367			Not Viable
LR03	336			Not Viable
LR04	111			Not Viable
LR05	84			Not Viable
LR06	61			Not Viable
LR07	56			Not Viable
LR08	14			Not Viable
SA2				1005
NWS08	13			Viable range £0 - £20,000

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
NWS09	311	801	Viable range £0 - £20,000	
NWS10	169		Viable range £0 - £20,000	
NWS11	77		Viable range £0 - £20,000	
NWS12	76		Viable range £0 - £20,000	
NWS13	63		Viable range £0 - £20,000	
NWS14	48		Viable range £0 - £20,000	
NWS15	41		Viable range £0 - £20,000	
NWS16	32		Viable range £0 - £20,000	
NWS17	23		Viable range £0 - £20,000	
NWS18	22		Viable range £0 - £20,000	
NWS19	19		Viable range £0 - £20,000	
NWS20	14		Viable range £0 - £20,000	
NWS21	14		Viable range £0 - £20,000	
NWS22	14		Viable range £0 - £20,000	
NWS23	13		Viable range £0 - £20,000	
NWS24	13		Viable range £0 - £20,000	
NWS25	12		Viable range £0 - £20,000	
NWS26	11		Viable range £0 - £20,000	
NWS27	10		Viable range £0 - £20,000	
NWS28	10		Viable range £0 - £20,000	
SA3				
NES09	53			Not Viable
NES10	32			Not Viable
NES11	88			Not Viable
NES12	73			Not Viable
NES13	68			Not Viable
NES14	44			Not Viable
NES15	33			Not Viable
NES16	32		Not Viable	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
NES17	29		Not Viable
NES18	24		Not Viable
NES19	24		Not Viable
NES20	24		Not Viable
NES21	23		Not Viable
NES22	21		Not Viable
NES23	20		Not Viable
NES24	20		Not Viable
NES25	20		Not Viable
NES26	20		Not Viable
NES27	19		Not Viable
NES28	19		Not Viable
NES29	19		Not Viable
NES30	19		Not Viable
NES31	18		Not Viable
NES32	17		Not Viable
NES33	16		Not Viable
NES34	14		Not Viable
NES35	12		Not Viable
SA4			2899
ES20	80	Not Viable	
ES21	28	Not Viable	
ES22	596	Not Viable	
ES23	371	Not Viable	
ES24	210	Not Viable	
ES25	147	Not Viable	
ES26	121	Not Viable	
ES27	120	Not Viable	
ES28	116	Not Viable	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
ES29	101		Not Viable	
ES30	98		Not Viable	
ES31	93		Not Viable	
ES32	93		Not Viable	
ES33	82		Not Viable	
ES34	68		Not Viable	
ES35	63		Not Viable	
ES36	48		Not Viable	
ES37	47		Not Viable	
ES38	46		Not Viable	
ES39	42		Not Viable	
ES40	41		Not Viable	
ES41	39		Not Viable	
ES42	37		Not Viable	
ES43	35		Not Viable	
ES44	28		Not Viable	
ES45	26		Not Viable	
ES46	24		Not Viable	
ES47	17		Not Viable	
ES48	17		Not Viable	
ES49	16		Not Viable	
ES50	16		Not Viable	
ES51	12		Not Viable	
ES52	11		Not Viable	
ES53	10		Not Viable	
SA5				
SES08	272		1607	Not Viable
SES09	218			Not Viable
SES10	151			Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SES11	151	760	Not Viable	
SES12	90		Not Viable	
SES13	75		Not Viable	
SES14	74		Not Viable	
SES15	50		Not Viable	
SES16	34		Not Viable	
SES17	31		Not Viable	
SES18	28		Not Viable	
SES19	27		Not Viable	
SES20	27		Not Viable	
SES21	26		Not Viable	
SES22	21		Not Viable	
SES23	20		Not Viable	
SES24	19		Not Viable	
SES25	14		Not Viable	
SES26	11		Not Viable	
SES27	10		Not Viable	
SES28	258		Not Viable	
SA6				
SS01	52			Viable range £0 - £20,000
SS02	45			Viable range £0 - £20,000
SS03	44			Viable range £0 - £20,000
SS04	37			Viable range £0 - £20,000
SS05	33			Viable range £0 - £20,000
SS06	30			Viable range £0 - £20,000
SS07	28			Viable range £0 - £20,000
SS08	26			Viable range £0 - £20,000
SS09	22			Viable range £0 - £20,000
SS10	17		Viable range £0 - £20,000	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
SS11	14		Viable range £0 - £20,000
SS12	14		Viable range £0 - £20,000
SS13	14		Viable range £0 - £20,000
SS14	12		Viable range £0 - £20,000
SS15	11		Viable range £0 - £20,000
SS16	10		Viable range £0 - £20,000
SS17	270		Viable range £0 - £20,000
SS18	81		Viable range £0 - £20,000
SA7		938	
SWS01	15		Viable range £0 - £20,000
SWS02	369		Viable range £0 - £20,000
SWS03	184		Viable range £0 - £20,000
SWS04	60		Viable range £0 - £20,000
SWS05	59		Viable range £0 - £20,000
SWS06	43		Viable range £0 - £20,000
SWS07	39		Viable range £0 - £20,000
SWS08	38		Viable range £0 - £20,000
SWS09	27		Viable range £0 - £20,000
SWS10	14		Viable range £0 - £20,000
SWS11	14		Viable range £0 - £20,000
SWS12	14		Viable range £0 - £20,000
SWS13	14		Viable range £0 - £20,000
SWS14	13		Viable range £0 - £20,000
SWS15	13		Viable range £0 - £20,000
SWS16	12		Viable range £0 - £20,000
SWS17	10	Viable range £0 - £20,000	
SA8		914	
SD02	428		Not Viable
SD03	190		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SD05	85		Not Viable	
SD06	55		Not Viable	
SD07	34		Not Viable	
SD08	33		Not Viable	
SD09	33		Not Viable	
SD10	18		Not Viable	
SD11	14		Not Viable	
SD12	14		Not Viable	
SD13	10		Not Viable	
SA9			24	
CH01	14			Not Viable
CH02	10			Not Viable
	27,229		27229	
Not viable	24,526			
Viable	2,703			

2.0 OBJECTION TO POLICY CA2: SITE ALLOCATIONS IN CASTLEGATE, WEST BAR, THE WICKER, AND VICTORIA

a) Site Reference: Buildings at Dixon Lane and Haymarket, S2 5TS Total housing capacity: 75 Homes

- 2.1 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.2 This is a mixed use scheme in an area of challenging viability. This raises additional complexities with the development of the site and many operators prefer a single use development which simplifies funding design and delivery.
- 2.3 The de-culverting and enhancement of watercourses will reduce site area and add complexity and costs to design solutions.
- 2.4 The site is a Level 2 Strategic Flood Risk Assessment (SFRA) and is not deliverable until it passes an exception test.
- 2.5 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.6 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.7 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.8 Part of the site is within 1 in 25 probability (including climate change allowance) of flooding should not be developed which reduces the developable area.
- 2.9 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.10 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.11 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.12 Action: Delete Allocation.

b) Site Reference: CW06 Address: 29-57 King Street, S3 8LF 19 Homes

- 2.14 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.15 This is a very small site to deliver a mixed use scheme in an area of challenging viability. The requirement for 60% offices on such a small site will cause considerable issues with delivery as the market for such small scale units is unlikely to fund the development. This raises additional complexities with the development of the site and many operators prefer a single use development which simplifies funding design and delivery.
- 2.16 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.17 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.18 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.19 Action: Delete Allocation.

**c) Site Reference CW07: 2 Haymarket And 5-7 Commercial Street, S11PF
Total housing capacity: 5 Homes**

- 2.20 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.21 This is a very small site to deliver a mixed use scheme in an area of challenging viability. The requirement for 60% offices on such a small site will cause considerable issues with delivery as the market for such small scale units is unlikely to fund the development. This raises additional complexities with the development of the site and many operators prefer a single use development which simplifies funding design and delivery.
- 2.22 The de-culverting and enhancement of watercourse will reduce site area and add complexity and costs to design solutions.
- 2.23 The council consider it necessary to have Heritage Statement. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.24 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.25 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.26 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.27 Action: Delete Allocation.

d) Site Reference CW08: First Floor To Third Floors, 19 – 21 Haymarket, S1 2AW: 5 Homes

- 2.28 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.29 This is a very small site to deliver a mixed use scheme of 3 units over 3 floors alongside 60% offices in an area of challenging viability is simply undeliverable. The requirement for 60% offices on such a small site will cause considerable issues with delivery as the market for such small scale units is unlikely to fund the development. This raises additional complexities with the development of the site and many operators prefer a single use development which simplifies funding design and delivery.
- 2.30 It is difficult to see how the reuse of these upper floors can deliver the de-culverting and enhancement of watercourses, but if possible it will add complexity and costs to design solutions.
- 2.31 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will clearly be difficult on these upper floors and may adversely impact on the viability of the scheme.
- 2.32 The council consider it necessary to have detailed archaeological evaluation that explains how potential archaeological impacts have been addressed is required. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.33 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.34 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.35 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.36 Action: Delete Allocation.

e) Site Reference CW09: Land to the north of Derek Dooley Way, S3 8EN: 336 Homes

- 2.37 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.38 The provision of open space on will increase costs and if provided on site will reduce size of the development.
- 2.39 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.40 The need to provide habitat connectivity across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.41 The council consider it necessary to have staged archaeological evaluation and/or building appraisal is required prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.42 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.43 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.44 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.45 Action: Delete Allocation.

- f) Site Reference: CW12 Address: 28 Johnson Street, 14-20 Stanley Street and 37-39 Wicker Lane, S3 8HJ: 94 Homes**
- 2.46 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.47 The site is a Level 2 Strategic Flood Risk Assessment (SFRA) and is not deliverable until it passes an exception test.
- 2.48 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.49 The need to provide habitat connectivity across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.50 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.51 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.52 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.53 Action: Delete Allocation.

g) Site Reference: CW13 Address: Aizlewood Mill Car Park, Land at Spitalfields, S3 8HQ: 83 Homes

- 2.54 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.55 The site is a Level 2 Strategic Flood Risk Assessment (SFRA) and is not deliverable until it passes an exception test.
- 2.56 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.57 The need to provide habitat connectivity across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.58 The council consider it necessary to have a detailed Heritage Statement. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.59 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.60 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.61 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.62 Action: Delete Allocation.

- h) Site Reference: CW14 Address: Land at Spitalfields and Nursery Street, S3 8HQ: 65 Homes**
- 2.63 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.64 Areas within 1 in 100 probability (including climate change allowance) of flooding reduce area to be developed.
- 2.65 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.66 The need to provide naturalised/enhanced and bankside connectivity maintained and/or enhanced habitat and connectivity (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.67 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.68 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.69 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.70 Action: Delete Allocation.

i) Site Reference: CW15 Address: Land at Windrush Way, S3 8JD: 46 Homes

- 2.71 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.72 The site is a Level 2 Strategic Flood Risk Assessment (SFRA) and is not deliverable until it passes an exception test.
- 2.73 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.74 The need to provide a buffer to the wildlife site and connectivity (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.75 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.76 This site is identified as impacting on a Heritage Asset and the conversation area which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.77 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.78 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.79 Action: Delete Allocation.

- j) Site Reference: CW16 Address: Buildings at Nursery Street and Stanley Street, S3 8HH 46 Homes**
- 2.80 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.81 The site is a Level 2 Strategic Flood Risk Assessment (SFRA) and is not deliverable until it passes an exception test.
- 2.82 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.83 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.84 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.85 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.86 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.87 Action: Delete Allocation.

- k) Site Reference: CW20 Address: 23-41 Wicker and 1-5 Stanley Street, S3 8HS 16 Homes**
- 2.88 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.89 The site is a Level 2 Strategic Flood Risk Assessment (SFRA) and is not deliverable until it passes an exception test.
- 2.90 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.91 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.92 The retention of any early 19th Century properties facing the Wicker would add further complexity and cost to bringing this site forward which would have not been taken into account in the general viability appraisal.
- 2.93 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.94 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.95 Action: Delete Allocation.

I) Site Reference: CW21 Address: 29-33 Nursery Street, S3 8GF 16 Homes

- 2.96 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.97 Areas within 1 in 25 probability (including climate change allowance) of flooding reduce area to be developed.
- 2.98 The site is a Level 2 Strategic Flood Risk Assessment (SFRA) and is not deliverable until it passes an exception test.
- 2.99 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.100 The need to provide a buffer to the wildlife site and connectivity (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.101 The council consider it necessary to have Heritage Statement. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.102 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.103 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.104 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.105 Action: Delete Allocation.

**m) Site Reference: CW22 Address Buildings at Joiner Street and Wicker Lane, S3 8GW
15 Homes**

- 2.106 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.107 Areas within 1 in 25 probability (including climate change allowance) of flooding reduce the area to be developed.
- 2.108 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.109 The council consider it necessary to have staged archaeological evaluation and/or building appraisal is required prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.110 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.111 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.112 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.113 Action: Delete Allocation.



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RTPI

Chartered Town Planner



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, Grace Clarkson, Stuart Garnett and Marcus Jolly
Organisation (if applicable): Hallam Land Management, Strata Homes, Inspired Villages and Lime Developments Limited
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: CA2

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.



Strategic Planning Research Unit
A specialist team within DLP Planning Ltd

For and on behalf of
**Hallam Land Management
Inspired Villages
Limes Developments Limited
Strata Homes (Yorkshire)**

**Sheffield Local Plan
Regulation 19 Consultation**

Objection to Policy CA3

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

February 2023



Prepared by:	Roland G Bolton BSc (Hons) MRPTI Senior Director
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Approved by:	Roland G Bolton BSc (Hons) MRTPI Senior Director
Date: February 2023	Office: Sheffield

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1.0 OBJECTIONS TO ALLOCATIONS IN POLICY CA3 ON GROUNDS OF VIABILITY

- 1.1 The Whole Plan Viability Assessment identifies the proposed allocations in policies CA1 to CA6 and SA 3,4, 5, 8 AND 9 as being unviable.
- 1.2 The table on the next pages applies the viability results from the Whole Plan Viability Assessment to the allocations and this highlights that allocations within these policies are unviable.
- 1.3 While each site will of course have its own circumstances and for these allocations to be sound the council will need to demonstrate that they are capable of being delivered, if they are to be included in the five year land supply from the date of adoption or at least deliverable within the plan period.
- 1.4 At present the evidence available for all the sites allocated in Policy CA3 is that they are unviable and not deliverable and as such it would be unsound to include these sites within the plan.

Table 1. Viability assessment of proposed allocations from the Whole Plan Viability Assessment

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
CA1			
KN03	191	2743	Not Viable
KN04	200		Not Viable
KN05	132		Not Viable
KN06	114		Not Viable
KN07	98		Not Viable
KN08	96		Not Viable
KN09	96		Not Viable
KN10	90		Not Viable
KN11	87		Not Viable
KN12	86		Not Viable
KN13	93		Not Viable
KN14	75		Not Viable
KN15	50		Not Viable
KN16	62		Not Viable
KN17	61		Not Viable
KN18	60		Not Viable
KN19	60		Not Viable
KN20	54		Not Viable
KN21	33		Not Viable
KN22	50		Not Viable
KN23	50		Not Viable
KN24	60		Not Viable
KN25	45		Not Viable
KN26	44		Not Viable
KN27	28		Not Viable
KN28	35		Not Viable
KN29	23		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
KN30	30		Not Viable
KN31	18		Not Viable
KN32	15		Not Viable
KN33	13		Not Viable
KN34	12		Not Viable
KN35	10		Not Viable
KN36	572		Not Viable
CA2		1849	
CW03	368		Not Viable
CW04	75		Not Viable
CW05	56		Not Viable
CW06	19		Not Viable
CW07	5		Not Viable
CW08	3		Not Viable
CW09	336		Not Viable
CW10	268		Not Viable
CW11	206		Not Viable
CW12	94		Not Viable
CW13	83		Not Viable
CW14	65		Not Viable
CW15	46		Not Viable
CW16	43		Not Viable
CW17	77		Not Viable
CW18	28		Not Viable
CW19	16		Not Viable
CW20	16		Not Viable
CW21	16		Not Viable
CW22	15		Not Viable
CW23	14		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
CA3			
SU02	32	3998	Not Viable
SU03	500		Not Viable
SU04	355		Not Viable
SU05	116		Not Viable
SU06	100		Not Viable
SU07	284		Not Viable
SU08	225		Not Viable
SU09	229		Not Viable
SU10	34		Not Viable
SU11	118		Not Viable
SU12	216		Not Viable
SU13	120		Not Viable
SU14	118		Not Viable
SU15	27		Not Viable
SU16	93		Not Viable
SU17	88		Not Viable
SU18	85		Not Viable
SU19	84		Not Viable
SU20	61		Not Viable
SU21	58		Not Viable
SU22	58		Not Viable
SU23	56		Not Viable
SU24	48		Not Viable
SU25	48		Not Viable
SU26	45		Not Viable
SU27	23		Not Viable
SU28	43		Not Viable
SU29	47		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SU30	22	2101	Not Viable	
SU31	39		Not Viable	
SU32	39		Not Viable	
SU33	38		Not Viable	
SU34	77		Not Viable	
SU35	20		Not Viable	
SU36	20		Not Viable	
SU37	61		Not Viable	
SU38	29		Not Viable	
SU39	46		Not Viable	
SU40	26		Not Viable	
SU41	25		Not Viable	
SU42	57		Not Viable	
SU43	17		Not Viable	
SU44	22		Not Viable	
SU45	21		Not Viable	
SU46	21		Not Viable	
SU47	10		Not Viable	
SU48	20		Not Viable	
SU49	18		Not Viable	
SU50	18		Not Viable	
SU51	17		Not Viable	
SU52	13		Not Viable	
SU53	11		Not Viable	
CA4				
SV04	303		2101	Not Viable
SV05	42		2101	Not Viable
SV06	335		2101	Not Viable
SV07	149		2101	Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SV08	121		Not Viable	
SV09	117		Not Viable	
SV10	108		Not Viable	
SV11	102		Not Viable	
SV12	100		Not Viable	
SV13	96		Not Viable	
SV14	95		Not Viable	
SV15	89		Not Viable	
SV16	85		Not Viable	
SV17	75		Not Viable	
SV18	66		Not Viable	
SV19	58		Not Viable	
SV20	42		Not Viable	
SV21	40		Not Viable	
SV22	30		Not Viable	
SV23	22		Not Viable	
SV24	16		Not Viable	
SV25	10		Not Viable	
CA5				
HC03	1006		6095	Not Viable
HC04	100			Not Viable
HC05	52			Not Viable
HC06	9			Not Viable
HC07	1230			Not Viable
HC08	714			Not Viable
HC09	410	Not Viable		
HC10	364	Not Viable		
HC11	364	Not Viable		
HC12	298	Not Viable		

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
HC13	213		Not Viable	
HC14	162		Not Viable	
HC15	136		Not Viable	
HC16	135		Not Viable	
HC17	135		Not Viable	
HC18	101		Not Viable	
HC19	97		Not Viable	
HC20	95		Not Viable	
HC21	93		Not Viable	
HC22	92		Not Viable	
HC23	77		Not Viable	
HC24	46		Not Viable	
HC25	45		Not Viable	
HC26	45		Not Viable	
HC27	30		Not Viable	
HC28	22		Not Viable	
HC29	12		Not Viable	
HC30	12		Not Viable	
CA6				
LR01	466		1495	Not Viable
LR02	367			Not Viable
LR03	336			Not Viable
LR04	111			Not Viable
LR05	84			Not Viable
LR06	61			Not Viable
LR07	56			Not Viable
LR08	14			Not Viable
SA2				1005
NWS08	13			Viable range £0 - £20,000

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
NWS09	311	801	Viable range £0 - £20,000	
NWS10	169		Viable range £0 - £20,000	
NWS11	77		Viable range £0 - £20,000	
NWS12	76		Viable range £0 - £20,000	
NWS13	63		Viable range £0 - £20,000	
NWS14	48		Viable range £0 - £20,000	
NWS15	41		Viable range £0 - £20,000	
NWS16	32		Viable range £0 - £20,000	
NWS17	23		Viable range £0 - £20,000	
NWS18	22		Viable range £0 - £20,000	
NWS19	19		Viable range £0 - £20,000	
NWS20	14		Viable range £0 - £20,000	
NWS21	14		Viable range £0 - £20,000	
NWS22	14		Viable range £0 - £20,000	
NWS23	13		Viable range £0 - £20,000	
NWS24	13		Viable range £0 - £20,000	
NWS25	12		Viable range £0 - £20,000	
NWS26	11		Viable range £0 - £20,000	
NWS27	10		Viable range £0 - £20,000	
NWS28	10		Viable range £0 - £20,000	
SA3				
NES09	53			Not Viable
NES10	32			Not Viable
NES11	88			Not Viable
NES12	73			Not Viable
NES13	68			Not Viable
NES14	44			Not Viable
NES15	33			Not Viable
NES16	32		Not Viable	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
NES17	29		Not Viable
NES18	24		Not Viable
NES19	24		Not Viable
NES20	24		Not Viable
NES21	23		Not Viable
NES22	21		Not Viable
NES23	20		Not Viable
NES24	20		Not Viable
NES25	20		Not Viable
NES26	20		Not Viable
NES27	19		Not Viable
NES28	19		Not Viable
NES29	19		Not Viable
NES30	19		Not Viable
NES31	18		Not Viable
NES32	17		Not Viable
NES33	16		Not Viable
NES34	14		Not Viable
NES35	12		Not Viable
SA4			2899
ES20	80	Not Viable	
ES21	28	Not Viable	
ES22	596	Not Viable	
ES23	371	Not Viable	
ES24	210	Not Viable	
ES25	147	Not Viable	
ES26	121	Not Viable	
ES27	120	Not Viable	
ES28	116	Not Viable	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
ES29	101		Not Viable	
ES30	98		Not Viable	
ES31	93		Not Viable	
ES32	93		Not Viable	
ES33	82		Not Viable	
ES34	68		Not Viable	
ES35	63		Not Viable	
ES36	48		Not Viable	
ES37	47		Not Viable	
ES38	46		Not Viable	
ES39	42		Not Viable	
ES40	41		Not Viable	
ES41	39		Not Viable	
ES42	37		Not Viable	
ES43	35		Not Viable	
ES44	28		Not Viable	
ES45	26		Not Viable	
ES46	24		Not Viable	
ES47	17		Not Viable	
ES48	17		Not Viable	
ES49	16		Not Viable	
ES50	16		Not Viable	
ES51	12		Not Viable	
ES52	11		Not Viable	
ES53	10		Not Viable	
SA5				
SES08	272		1607	Not Viable
SES09	218			Not Viable
SES10	151	Not Viable		

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SES11	151	760	Not Viable	
SES12	90		Not Viable	
SES13	75		Not Viable	
SES14	74		Not Viable	
SES15	50		Not Viable	
SES16	34		Not Viable	
SES17	31		Not Viable	
SES18	28		Not Viable	
SES19	27		Not Viable	
SES20	27		Not Viable	
SES21	26		Not Viable	
SES22	21		Not Viable	
SES23	20		Not Viable	
SES24	19		Not Viable	
SES25	14		Not Viable	
SES26	11		Not Viable	
SES27	10		Not Viable	
SES28	258		Not Viable	
SA6				
SS01	52			Viable range £0 - £20,000
SS02	45			Viable range £0 - £20,000
SS03	44			Viable range £0 - £20,000
SS04	37			Viable range £0 - £20,000
SS05	33			Viable range £0 - £20,000
SS06	30			Viable range £0 - £20,000
SS07	28			Viable range £0 - £20,000
SS08	26			Viable range £0 - £20,000
SS09	22			Viable range £0 - £20,000
SS10	17		Viable range £0 - £20,000	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
SS11	14		Viable range £0 - £20,000
SS12	14		Viable range £0 - £20,000
SS13	14		Viable range £0 - £20,000
SS14	12		Viable range £0 - £20,000
SS15	11		Viable range £0 - £20,000
SS16	10		Viable range £0 - £20,000
SS17	270		Viable range £0 - £20,000
SS18	81		Viable range £0 - £20,000
SA7		938	
SWS01	15		Viable range £0 - £20,000
SWS02	369		Viable range £0 - £20,000
SWS03	184		Viable range £0 - £20,000
SWS04	60		Viable range £0 - £20,000
SWS05	59		Viable range £0 - £20,000
SWS06	43		Viable range £0 - £20,000
SWS07	39		Viable range £0 - £20,000
SWS08	38		Viable range £0 - £20,000
SWS09	27		Viable range £0 - £20,000
SWS10	14		Viable range £0 - £20,000
SWS11	14		Viable range £0 - £20,000
SWS12	14		Viable range £0 - £20,000
SWS13	14		Viable range £0 - £20,000
SWS14	13		Viable range £0 - £20,000
SWS15	13		Viable range £0 - £20,000
SWS16	12		Viable range £0 - £20,000
SWS17	10	Viable range £0 - £20,000	
SA8		914	
SD02	428		Not Viable
SD03	190		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SD05	85		Not Viable	
SD06	55		Not Viable	
SD07	34		Not Viable	
SD08	33		Not Viable	
SD09	33		Not Viable	
SD10	18		Not Viable	
SD11	14		Not Viable	
SD12	14		Not Viable	
SD13	10		Not Viable	
SA9			24	
CH01	14			Not Viable
CH02	10			Not Viable
	27,229		27229	
Not viable	24,526			
Viable	2,703			

2.0 OBJECTION TO POLICY CA3: - SITE ALLOCATIONS IN ST VINCENT'S, CATHEDRAL, ST GEORGE'S AND UNIVERSITY OF SHEFFIELD)

a) Site Reference SU05: 26 Meadow Street, S3 7AW Total housing capacity: 112 Homes

- 2.1 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.2 The provision of open space to be provided in accordance with Policy NC15 will have a financial and/or a spatial impact on the scheme.
- 2.3 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.4 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.5 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.6 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.7 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.8 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.9 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.10 Action: Delete Allocation.

**b) Site Reference SU08: Buildings at Scotland Street and Cross Smithfield, S3 7DE
Total housing capacity: 225 Homes**

- 2.12 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.13 The provision of open space to be provided in accordance with Policy NC15 will have a financial and/or a spatial impact on the scheme.
- 2.14 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.15 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.16 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.17 The council consider it necessary to have Heritage Statement. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.18 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.19 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.20 Action: Delete Allocation.

c) Site Reference SU10: 75-173 Gibraltar Street and 9 Cupola, S3 8UA
Total housing capacity: 34 Homes

- 2.21 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.22 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.23 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.24 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.25 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.26 Action: Delete Allocation.

d) Site Reference SU11: Greenfield House, 32 Scotland Street, S3 7AF
Total housing capacity: 118 Homes

- 2.27 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.28 The provision of open space to be provided in accordance with Policy NC15 will have a financial and/or a spatial impact on the scheme.
- 2.29 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.30 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.31 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.32 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.33 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.34 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.35 Action: Delete Allocation.

- e) Site Reference SU12: 34 West Bar, 10 Bower Spring and 83 Steelhouse Lane, S3 8PB
Total housing capacity: 216 Homes**
- 2.36 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.37 The provision of open space to be provided in accordance with Policy NC15 will have a financial and/or a spatial impact on the scheme.
- 2.38 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.39 The council consider it necessary to have a Heritage Statement. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.40 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.41 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.42 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.43 Action: Delete Allocation.

2.44 Site Reference SU13: Land at Bailey Street, S1 4EH
Total housing capacity: 120 Homes

- 2.45 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.46 The provision of open space to be provided in accordance with Policy NC15 will have a financial and/or a spatial impact on the scheme.
- 2.47 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.48 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.49 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.50 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.51 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.52 Action: Delete Allocation.

- f) Site Reference SU16: Buildings at Meadow Street and Morpeth Street, S3 7EZ: 93 Homes**
- 2.53 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.54 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.55 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.56 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.57 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.58 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.59 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.60 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.61 Action: Delete Allocation.

- g) Site Reference SU17: 30-32 Edward Street and 139 Upper Allen Street, S3 7GW: 88 Homes**
- 2.62 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.63 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.64 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.65 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.66 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.67 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.68 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.69 Action: Delete Allocation.

h) Site Reference SU18: Buildings at Edward Street and Meadow Street, S3 7BL: 85 Homes

- 2.70 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.71 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.72 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.73 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.74 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.75 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.76 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.77 Action: Delete Allocation.

- i) Site Reference SU20: Buildings at Meetinghouse Lane and Harts Head, S1 2DR: 81 Homes**
- 2.79 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.80 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.81 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.82 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.83 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.84 Action: Delete Allocation.

j) Site Reference SU21: Land at Doncaster Street and Shephard Street, S3 7BA: 58 Homes

- 2.85 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.86 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.87 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.88 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.89 The council consider it necessary to have a Heritage Statement. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.90 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.91 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.92 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.93 Action: Delete Allocation.

k) Site Reference SU23: Hayes House, Edward Street, S1 4BB: 56 Homes

- 2.95 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.96 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.97 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.98 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.99 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.100 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.101 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.102 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.103 Action: Delete Allocation.

I) Site Reference SU24: 1-3 Broad Lane, S1 1YG: 48 Homes

- 2.104 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.105 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.106 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.107 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.108 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.109 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.110 Action: Delete Allocation.

- m) Site Reference SU26: 65-69 Broad Lane and 1-10 Rockingham Street, S1 4EA: 45 Homes**
- 2.111 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.112 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.113 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.114 The council consider it necessary to have a Heritage Statement. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.115 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.116 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.117 Action: Delete Allocation.

n) Site Reference SU27: 115-121 West Bar and land adjacent, S3 8PT: 23 Homes

- 2.118 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.119 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.120 The council consider it necessary to have a Heritage Statement. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.121 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.122 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.123 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.124 Action: Delete Allocation.

- o) Site Reference SU30: Land adjacent to Shakespeare's, 146-148 Gibraltar Street, S3 8UB: 22 Homes**
- 2.125 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.126 Extent of development (if any) cannot be established until further archaeological work is required to ensure the site layout is sensitive to archaeological remains, and mitigates impact to the on site Scheduled Monument.
- 2.127 The requirement to repair/stabilise the Bower Spring Cementation Furnace as part of redevelopment adds complexity and cost to this very small scheme.
- 2.128 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.129 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc could have a considerable impact on the scale of development.
- 2.130 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.131 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.132 Action: Delete Allocation.

p) Site Reference SU31: 11-25 High Street, S1 2ER: 30 Homes

- 2.133 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.134 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.135 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.136 The council consider it necessary to have a Heritage Statement. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.137 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.138 The requirement to retain non designated buildings adds to schemes complexity and cost.
- 2.139 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.140 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.141 Action: Delete Allocation.

q) Site Reference SU32: 123-125 Queen Street, S1 2DU: 39 Homes

- 2.142 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.143 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.144 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.145 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.146 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.147 Action: Delete Allocation.

r) Site Reference SU33: Hanover Works, Scotland Street, S3 7DB: 38 Homes

- 2.148 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.149 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.150 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.151 The council consider it necessary to have staged archaeological evaluation and/or building appraisal is required prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.152 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.153 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.154 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.155 Action: Delete Allocation.

s) Site Reference SU34: Buildings at Allen Street and Copper Street, S3 7AG: 77 Homes

- 2.156 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.157 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.158 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.159 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.160 The council consider it necessary to have staged archaeological evaluation and/or building appraisal is required prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.161 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.162 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.163 Action: Delete Allocation.

t) Site Reference SU35: Land to the south of Furnace Hill, S3 7BG: 20 Homes

- 2.164 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.165 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.166 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.167 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.168 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.169 Action: Delete Allocation.

u) Site Reference SU23: Buildings at Allen Street and Snow Lane, S3 7AF: 61 Homes

- 2.170 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.171 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.172 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.173 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.174 The council consider it necessary to have a Heritage Statement prior to development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.175 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.176 The requirement to retain the early 20th Century brick buildings adds complexity and cost to any scheme.
- 2.177 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.178 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.179 Action: Delete Allocation.

v) Site Reference SU38: 86-90 Queen Street and 35-47 North Church Street, S1 2DH: 29 Homes

- 2.180 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.181 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.182 The council consider it necessary to have staged archaeological evaluation and/or building appraisal is required prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.183 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.184 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.185 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.186 Action: Delete Allocation.

w) Site Reference SU39: 63-69 Allen Street and 28-32 Cross Smithfield, S3 7AW: 46 Homes

- 2.187 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.188 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.189 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.190 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.191 Action: Delete Allocation.

x) Site Reference SU40: Buildings at Lee Croft and Campo Lane, S1 2DY: 26 Homes

- 2.192 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.193 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.194 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.195 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.196 The retention of the Sheffield Central Elim Pentecostal Church as an important community facility as part of redevelopment of the site adds costs and complexity to a small scheme with questionable general viability.
- 2.197 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.198 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.199 Action: Delete Allocation.

y) Site Reference SU41: Courtwood House, Silver Street, S1 2DD: 25 Homes

- 2.200 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.201 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.202 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.203 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.204 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.205 Action: Delete Allocation.

z) Site Reference SU42: Portland House, Moorfields, S3 7BA: 57 Homes

- 2.206 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.207 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.208 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.209 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.210 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.211 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.212 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.213 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.214 Action: Delete Allocation

aa) Site Reference SU43: Land to the south of Allen Street, S3 7AG: 17 Homes

- 2.215 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.216 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.217 The council consider it necessary to have staged archaeological evaluation and/or building appraisal is required prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.218 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.219 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.220 Action: Delete Allocation

bb) Site Reference SU45 39-41 Snig Hill and 4-8 Bank Street, S3 8NA: 21 Homes

- 2.221 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.222 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.223 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.224 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.225 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.226 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.227 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.228 Action: Delete Allocation

cc) Site Reference SU47 129-135 West Bar, S3 8PT: 10 Homes

- 2.229 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.230 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.231 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.232 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.233 The requirement to repair and reuse of buildings along West Bar as part of this very small development adds costs and complexity.
- 2.234 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.235 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.236 Action: Delete Allocation

dd) Site Reference SU48 Land at Townhead Street, S1 2EB: 20 Homes

- 2.237 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.238 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.239 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.240 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.241 Action: Delete Allocation

ee) Site Reference SU51: 22 Copper Street and St Judes Church, Copper Street, S3 7AH: 17 Homes

- 2.242 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.243 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.244 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.245 The council consider it necessary to have a Heritage Impact Statement and a Heritage statement prior to development. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.246 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.247 The requirement to retain non-designated heritage asset adds complexity and cost to this very small scheme.
- 2.248 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.249 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.250 Action: Delete Allocation.



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RTPI

Chartered Town Planner



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, Grace Clarkson, Stuart Garnett and Marcus Jolly
Organisation (if applicable): Hallam Land Management, Strata Homes, Inspired Villages and Lime Developments Limited
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: CA3

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.



Strategic Planning Research Unit
A specialist team within DLP Planning Ltd

For and on behalf of
**Hallam Land Management
Inspired Villages
Limes Developments Limited
Strata Homes (Yorkshire)**

**Sheffield Local Plan
Regulation 19 Consultation**

Objection to Policy CA4

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

February 2023



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

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1.0 OBJECTIONS TO ALLOCATIONS IN POLICY CA4 ON GROUNDS OF VIABILITY

- 1.1 The Whole Plan Viability Assessment identifies the proposed allocations in policies CA1 to CA6 and SA 3,4, 5, 8 AND 9 as being unviable.
- 1.2 The table on the next pages applies the viability results from the Whole Plan Viability Assessment to the allocations and this highlights that allocations within these policies are unviable.
- 1.3 While each site will of course have its own circumstances and for these allocations to be sound the council will need to demonstrate that they are capable of being delivered, if they are to be included in the five year land supply from the date of adoption or at least deliverable within the plan period.
- 1.4 At present the evidence available for all the sites allocated in Policy CA4 is that they are unviable and not deliverable and as such it would be unsound to include these sites within the plan.

Table 1. Viability assessment of proposed allocations from the Whole Plan Viability Assessment

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
CA1			
KN03	191	2743	Not Viable
KN04	200		Not Viable
KN05	132		Not Viable
KN06	114		Not Viable
KN07	98		Not Viable
KN08	96		Not Viable
KN09	96		Not Viable
KN10	90		Not Viable
KN11	87		Not Viable
KN12	86		Not Viable
KN13	93		Not Viable
KN14	75		Not Viable
KN15	50		Not Viable
KN16	62		Not Viable
KN17	61		Not Viable
KN18	60		Not Viable
KN19	60		Not Viable
KN20	54		Not Viable
KN21	33		Not Viable
KN22	50		Not Viable
KN23	50		Not Viable
KN24	60		Not Viable
KN25	45		Not Viable
KN26	44		Not Viable
KN27	28		Not Viable
KN28	35		Not Viable
KN29	23		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
KN30	30		Not Viable
KN31	18		Not Viable
KN32	15		Not Viable
KN33	13		Not Viable
KN34	12		Not Viable
KN35	10		Not Viable
KN36	572		Not Viable
CA2			
CW03	368	1849	Not Viable
CW04	75		Not Viable
CW05	56		Not Viable
CW06	19		Not Viable
CW07	5		Not Viable
CW08	3		Not Viable
CW09	336		Not Viable
CW10	268		Not Viable
CW11	206		Not Viable
CW12	94		Not Viable
CW13	83		Not Viable
CW14	65		Not Viable
CW15	46		Not Viable
CW16	43		Not Viable
CW17	77		Not Viable
CW18	28		Not Viable
CW19	16		Not Viable
CW20	16		Not Viable
CW21	16		Not Viable
CW22	15		Not Viable
CW23	14		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
CA3			
SU02	32	3998	Not Viable
SU03	500		Not Viable
SU04	355		Not Viable
SU05	116		Not Viable
SU06	100		Not Viable
SU07	284		Not Viable
SU08	225		Not Viable
SU09	229		Not Viable
SU10	34		Not Viable
SU11	118		Not Viable
SU12	216		Not Viable
SU13	120		Not Viable
SU14	118		Not Viable
SU15	27		Not Viable
SU16	93		Not Viable
SU17	88		Not Viable
SU18	85		Not Viable
SU19	84		Not Viable
SU20	61		Not Viable
SU21	58		Not Viable
SU22	58		Not Viable
SU23	56		Not Viable
SU24	48		Not Viable
SU25	48		Not Viable
SU26	45		Not Viable
SU27	23		Not Viable
SU28	43		Not Viable
SU29	47		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SU30	22	2101	Not Viable	
SU31	39		Not Viable	
SU32	39		Not Viable	
SU33	38		Not Viable	
SU34	77		Not Viable	
SU35	20		Not Viable	
SU36	20		Not Viable	
SU37	61		Not Viable	
SU38	29		Not Viable	
SU39	46		Not Viable	
SU40	26		Not Viable	
SU41	25		Not Viable	
SU42	57		Not Viable	
SU43	17		Not Viable	
SU44	22		Not Viable	
SU45	21		Not Viable	
SU46	21		Not Viable	
SU47	10		Not Viable	
SU48	20		Not Viable	
SU49	18		Not Viable	
SU50	18		Not Viable	
SU51	17		Not Viable	
SU52	13		Not Viable	
SU53	11		Not Viable	
CA4				
SV04	303		2101	Not Viable
SV05	42		2101	Not Viable
SV06	335		2101	Not Viable
SV07	149		2101	Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SV08	121	6095	Not Viable	
SV09	117		Not Viable	
SV10	108		Not Viable	
SV11	102		Not Viable	
SV12	100		Not Viable	
SV13	96		Not Viable	
SV14	95		Not Viable	
SV15	89		Not Viable	
SV16	85		Not Viable	
SV17	75		Not Viable	
SV18	66		Not Viable	
SV19	58		Not Viable	
SV20	42		Not Viable	
SV21	40		Not Viable	
SV22	30		Not Viable	
SV23	22		Not Viable	
SV24	16		Not Viable	
SV25	10		Not Viable	
CA5				
HC03	1006		6095	Not Viable
HC04	100			Not Viable
HC05	52			Not Viable
HC06	9			Not Viable
HC07	1230			Not Viable
HC08	714			Not Viable
HC09	410	Not Viable		
HC10	364	Not Viable		
HC11	364	Not Viable		
HC12	298	Not Viable		

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
HC13	213		Not Viable	
HC14	162		Not Viable	
HC15	136		Not Viable	
HC16	135		Not Viable	
HC17	135		Not Viable	
HC18	101		Not Viable	
HC19	97		Not Viable	
HC20	95		Not Viable	
HC21	93		Not Viable	
HC22	92		Not Viable	
HC23	77		Not Viable	
HC24	46		Not Viable	
HC25	45		Not Viable	
HC26	45		Not Viable	
HC27	30		Not Viable	
HC28	22		Not Viable	
HC29	12		Not Viable	
HC30	12		Not Viable	
CA6				
LR01	466		1495	Not Viable
LR02	367	Not Viable		
LR03	336	Not Viable		
LR04	111	Not Viable		
LR05	84	Not Viable		
LR06	61	Not Viable		
LR07	56	Not Viable		
LR08	14	Not Viable		
SA2		1005		
NWS08	13		Viable range £0 - £20,000	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
NWS09	311	801	Viable range £0 - £20,000	
NWS10	169		Viable range £0 - £20,000	
NWS11	77		Viable range £0 - £20,000	
NWS12	76		Viable range £0 - £20,000	
NWS13	63		Viable range £0 - £20,000	
NWS14	48		Viable range £0 - £20,000	
NWS15	41		Viable range £0 - £20,000	
NWS16	32		Viable range £0 - £20,000	
NWS17	23		Viable range £0 - £20,000	
NWS18	22		Viable range £0 - £20,000	
NWS19	19		Viable range £0 - £20,000	
NWS20	14		Viable range £0 - £20,000	
NWS21	14		Viable range £0 - £20,000	
NWS22	14		Viable range £0 - £20,000	
NWS23	13		Viable range £0 - £20,000	
NWS24	13		Viable range £0 - £20,000	
NWS25	12		Viable range £0 - £20,000	
NWS26	11		Viable range £0 - £20,000	
NWS27	10		Viable range £0 - £20,000	
NWS28	10		Viable range £0 - £20,000	
SA3				
NES09	53			Not Viable
NES10	32			Not Viable
NES11	88			Not Viable
NES12	73			Not Viable
NES13	68			Not Viable
NES14	44			Not Viable
NES15	33			Not Viable
NES16	32		Not Viable	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
NES17	29		Not Viable
NES18	24		Not Viable
NES19	24		Not Viable
NES20	24		Not Viable
NES21	23		Not Viable
NES22	21		Not Viable
NES23	20		Not Viable
NES24	20		Not Viable
NES25	20		Not Viable
NES26	20		Not Viable
NES27	19		Not Viable
NES28	19		Not Viable
NES29	19		Not Viable
NES30	19		Not Viable
NES31	18		Not Viable
NES32	17		Not Viable
NES33	16		Not Viable
NES34	14	Not Viable	
NES35	12	Not Viable	
SA4		2899	
ES20	80		Not Viable
ES21	28		Not Viable
ES22	596		Not Viable
ES23	371		Not Viable
ES24	210		Not Viable
ES25	147		Not Viable
ES26	121		Not Viable
ES27	120		Not Viable
ES28	116		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
ES29	101		Not Viable	
ES30	98		Not Viable	
ES31	93		Not Viable	
ES32	93		Not Viable	
ES33	82		Not Viable	
ES34	68		Not Viable	
ES35	63		Not Viable	
ES36	48		Not Viable	
ES37	47		Not Viable	
ES38	46		Not Viable	
ES39	42		Not Viable	
ES40	41		Not Viable	
ES41	39		Not Viable	
ES42	37		Not Viable	
ES43	35		Not Viable	
ES44	28		Not Viable	
ES45	26		Not Viable	
ES46	24		Not Viable	
ES47	17		Not Viable	
ES48	17		Not Viable	
ES49	16		Not Viable	
ES50	16		Not Viable	
ES51	12		Not Viable	
ES52	11		Not Viable	
ES53	10		Not Viable	
SA5				
SES08	272		1607	Not Viable
SES09	218			Not Viable
SES10	151			Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SES11	151	760	Not Viable	
SES12	90		Not Viable	
SES13	75		Not Viable	
SES14	74		Not Viable	
SES15	50		Not Viable	
SES16	34		Not Viable	
SES17	31		Not Viable	
SES18	28		Not Viable	
SES19	27		Not Viable	
SES20	27		Not Viable	
SES21	26		Not Viable	
SES22	21		Not Viable	
SES23	20		Not Viable	
SES24	19		Not Viable	
SES25	14		Not Viable	
SES26	11		Not Viable	
SES27	10		Not Viable	
SES28	258		Not Viable	
SA6				
SS01	52			Viable range £0 - £20,000
SS02	45			Viable range £0 - £20,000
SS03	44			Viable range £0 - £20,000
SS04	37			Viable range £0 - £20,000
SS05	33			Viable range £0 - £20,000
SS06	30			Viable range £0 - £20,000
SS07	28			Viable range £0 - £20,000
SS08	26			Viable range £0 - £20,000
SS09	22			Viable range £0 - £20,000
SS10	17		Viable range £0 - £20,000	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
SS11	14		Viable range £0 - £20,000
SS12	14		Viable range £0 - £20,000
SS13	14		Viable range £0 - £20,000
SS14	12		Viable range £0 - £20,000
SS15	11		Viable range £0 - £20,000
SS16	10		Viable range £0 - £20,000
SS17	270		Viable range £0 - £20,000
SS18	81		Viable range £0 - £20,000
SA7		938	
SWS01	15		Viable range £0 - £20,000
SWS02	369		Viable range £0 - £20,000
SWS03	184		Viable range £0 - £20,000
SWS04	60		Viable range £0 - £20,000
SWS05	59		Viable range £0 - £20,000
SWS06	43		Viable range £0 - £20,000
SWS07	39		Viable range £0 - £20,000
SWS08	38		Viable range £0 - £20,000
SWS09	27		Viable range £0 - £20,000
SWS10	14		Viable range £0 - £20,000
SWS11	14		Viable range £0 - £20,000
SWS12	14		Viable range £0 - £20,000
SWS13	14		Viable range £0 - £20,000
SWS14	13		Viable range £0 - £20,000
SWS15	13		Viable range £0 - £20,000
SWS16	12		Viable range £0 - £20,000
SWS17	10	Viable range £0 - £20,000	
SA8		914	
SD02	428		Not Viable
SD03	190		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SD05	85		Not Viable	
SD06	55		Not Viable	
SD07	34		Not Viable	
SD08	33		Not Viable	
SD09	33		Not Viable	
SD10	18		Not Viable	
SD11	14		Not Viable	
SD12	14		Not Viable	
SD13	10		Not Viable	
SA9			24	
CH01	14			Not Viable
CH02	10			Not Viable
	27,229		27229	
Not viable	24,526			
Viable	2,703			

2.0 OBJECTION TO POLICY CA4: SITE ALLOCATIONS IN CITY ARRIVAL, CULTURAL INDUSTRIES QUARTER, SHEAF VALLEY

a) Site Reference SV04: Decathlon, Eyre Street, S1 3HU Total housing capacity: 303 Homes

- 2.1 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.2 The requirement to provide Community, Commercial and/or Retail uses at ground floor level increases the complexity and cost of the scheme.
- 2.3 The site is a Level 2 Strategic Flood Risk Assessment (SFRA) and is not deliverable until it passes an exception test.
- 2.4 The requirement to de-culvert and enhanced watercourse has costs and spatial implications for the site not taken into account in the general assessment.
- 2.5 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.6 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.7 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.8 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.9 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.10 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.11 Action: Delete Allocation.

b) Site Reference SV05: K.T Precision Engineering and land adjacent, Turner Street, S2 4AB: 42 Homes

- 2.13 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.14 The requirement to provide a high level of office floor space adds the complexity and cost to this small scheme.
- 2.15 The site is a Level 2 Strategic Flood Risk Assessment (SFRA) and is not deliverable until it passes an exception test.
- 2.16 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.17 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.18 The requirement to retain non-designated heritage assets adds complexity and costs to this scheme.
- 2.19 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.20 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.21 Action: Delete Allocation.

d) Site Reference SV07: Buildings at Shoreham Street and Mary Street, S1 4SQ
Total housing capacity: 118 Homes

- 2.22 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.23 The provision of open space to be provided in accordance with Policy NC15 will have a financial and/or a spatial impact on the scheme.
- 2.24 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.25 The site is a Level 2 Strategic Flood Risk Assessment (SFRA) and is not deliverable until it passes an exception test.
- 2.26 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.27 The council consider it necessary to have staged archaeological evaluation and/or building appraisal is required prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.28 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.29 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.30 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.31 Action: Delete Allocation.

e) Site Reference SV08: Mecca Bingo, Flat Street, S1 2BA: 121 Homes

- 2.32 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.33 The provision of open space to be provided in accordance with Policy NC15 will have a financial and/or a spatial impact on the scheme.
- 2.34 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.35 The requirement to de-culvert and enhance watercourses has costs and spatial implications for the site not taken into account in the general assessment.
- 2.36 The council consider it necessary to have a Heritage Statement. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.37 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.38 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.39 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.40 Action: Delete Allocation.

f) Site Reference SV09: 3-7 Sidney Street and land adjacent, S1 4RG: 117 Homes

- 2.41 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.42 The provision of open space to be provided in accordance with Policy NC15 will have a financial and/or a spatial impact on the scheme.
- 2.43 A further impact on the deliverability of the site is the extension of the publicly accessible Porter Brook Trail along the riverside and connected with the adjacent section of trail.
- 2.44 Part of the site is undevelopable as it is within 1 in 100 probability (including climate change allowance) of flooding.
- 2.45 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.46 The requirement to de-culvert and enhance watercourses has costs and spatial implications for the site not taken into account in the general assessment.
- 2.47 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.48 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.49 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.50 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.51 Action: Delete Allocation.

g) Site Reference SV11: 48 Suffolk Road, S2 4AL 102 Homes

- 2.52 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.53 The provision of open space to be provided in accordance with Policy NC15 will have a financial and/or a spatial impact on the scheme.
- 2.54 Part of the site is undevelopable as it is within 1 in 25 probability (including climate change allowance) of flooding.
- 2.55 The site is a Level 2 Strategic Flood Risk Assessment (SFRA) and is not deliverable until it passes an exception test.
- 2.56 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.57 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.58 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.59 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.60 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.61 Action: Delete Allocation.

2.62 Site Reference SU13: Land at Bailey Street, S1 4EH
Total housing capacity: 120 Homes

- 2.63 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.64 The provision of open space to be provided in accordance with Policy NC15 will have a financial and/or a spatial impact on the scheme.
- 2.65 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.66 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.67 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.68 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.69 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.70 Action: Delete Allocation.

**h) Site Reference SV15: 125-157 Eyre Street and land adjacent, S1 4QW
Total housing capacity: 89 Homes**

- 2.71 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.72 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.73 Part of the site is undevelopable as it is within 1 in 100 probability (including climate change allowance) of flooding.
- 2.74 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.75 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.76 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.77 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.78 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.79 Action: Delete Allocation.

i) Site Reference SV16: St Mary's Wesleyan Reform Church, S1 4PN: 85 Homes

- 2.81 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.82 It is difficult to see how St Mary's Wesleyan Reform Church, which is an important community facility, can be retained (as required by policy) and some 85 homes be delivered on this site.
- 2.83 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc could have a considerable impact on the scale of development.
- 2.84 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.85 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.86 Action: Delete Allocation.

- j) Site Reference SV17: Buildings at Arundel Street and Eyre Street, S1 4PY: 75 Homes**
- 2.87 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.88 The site is a Level 2 Strategic Flood Risk Assessment (SFRA) and is not deliverable until it passes an exception test.
- 2.89 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.90 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.91 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.92 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.93 The requirement to retain The Lord Nelson public house (a non-designated heritage asset) complicates the scheme and adds to the cost.
- 2.94 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.95 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.96 Action: Delete Allocation.

k) Site Reference SV18: 66-76 Sidney Street, S1 4RG: 66 Homes

- 2.97 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.98 The site is a Level 2 Strategic Flood Risk Assessment (SFRA) and is not deliverable until it passes an exception test.
- 2.99 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.100 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.101 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.102 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.103 The requirement to retain non-designated heritage assets complicates the scheme and adds to the cost.
- 2.104 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.105 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.106 Action: Delete Allocation.

I) Site Reference SV19: 121 Eyre Street, S1 4QW: 58 Homes

- 2.107 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.108 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.109 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.110 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.111 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.112 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.113 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.114 Action: Delete Allocation.

m) Site Reference SV21: Land at Claywood Drive, S2 2UB: 40 Homes

- 2.115 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.116 The site specific requirements have a considerable potential to impact on the viability and deliverability of this site. These include:
- Retain tree belt onto Shrewsbury Road.
 - View towards Cholera Monument from South Street not to be obstructed.
 - Green transition space needed to protect the historic garden (southeast boundary) and setting of the Cholera Monument (along the south west boundary).
 - Green links into the Cholera Monument and Claywoods greenspace to be provided through the development will impact on layout developable area and potential viability.
- 2.117 The site cannot be considered to be deliverable until further survey work is undertaken to determine the impact of development on the Local Geological Site, and the mitigation that is necessary.
- 2.118 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.119 5m and 1m buffers are required to the adjacent Local Wildlife Site, in addition to the need to provide connectivity corridors/areas (including buffers) across the site. Biodiversity Net Gain is also required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.120 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.121 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.122 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.123 Action: Delete Allocation.

n) Site Reference SV22: 93-97 Mary Street, S1 4RT: 30 Homes

- 2.125 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.126 The site is a Level 2 Strategic Flood Risk Assessment (SFRA) and is not deliverable until it passes an exception test.
- 2.127 The requirement to de-culvert and enhanced the watercourse has costs and spatial implications for the site not taken into account in the general assessment.
- 2.128 Parts of site are within 1 in 25 probability (including climate change allowance) of flooding which reduces the size of the site.
- 2.129 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.130 The council consider it necessary to have detailed Heritage Statement that explains how potential impacts have been addressed is required. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.131 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.132 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.133 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.134 Action: Delete Allocation.



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RTPI

Chartered Town Planner



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, Grace Clarkson, Stuart Garnett and Marcus Jolly
Organisation (if applicable): Hallam Land Management, Strata Homes, Inspired Villages and Lime Developments Limited
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: CA4

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.



Strategic Planning Research Unit
A specialist team within DLP Planning Ltd

For and on behalf of
**Hallam Land Management
Inspired Villages
Limes Developments Limited
Strata Homes (Yorkshire)**

**Sheffield Local Plan
Regulation 19 Consultation**

Objection to Policy CA5

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

February 2023



Prepared by:	Roland G Bolton BSc (Hons) MRPTI Senior Director
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1.0 OBJECTIONS TO ALLOCATIONS IN POLICY CA5 ON GROUNDS OF VIABILITY

- 1.1 The Whole Plan Viability Assessment identifies the proposed allocations in policies CA1 to CA6 and SA 3,4, 5, 8 AND 9 as being unviable.
- 1.2 The table on the next pages applies the viability results from the Whole Plan Viability Assessment to the allocations and this highlights that allocations within these policies are unviable.
- 1.3 While each site will of course have its own circumstances and for these allocations to be sound the council will need to demonstrate that they are capable of being delivered, if they are to be included in the five year land supply from the date of adoption or at least deliverable within the plan period.
- 1.4 At present the evidence available for all the sites allocated in Policy CA5 is that they are unviable and not deliverable and as such it would be unsound to include these sites within the plan.

Table 1. Viability assessment of proposed allocations from the Whole Plan Viability Assessment

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
CA1			
KN03	191	2743	Not Viable
KN04	200		Not Viable
KN05	132		Not Viable
KN06	114		Not Viable
KN07	98		Not Viable
KN08	96		Not Viable
KN09	96		Not Viable
KN10	90		Not Viable
KN11	87		Not Viable
KN12	86		Not Viable
KN13	93		Not Viable
KN14	75		Not Viable
KN15	50		Not Viable
KN16	62		Not Viable
KN17	61		Not Viable
KN18	60		Not Viable
KN19	60		Not Viable
KN20	54		Not Viable
KN21	33		Not Viable
KN22	50		Not Viable
KN23	50		Not Viable
KN24	60		Not Viable
KN25	45		Not Viable
KN26	44		Not Viable
KN27	28		Not Viable
KN28	35		Not Viable
KN29	23		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
KN30	30		Not Viable
KN31	18		Not Viable
KN32	15		Not Viable
KN33	13		Not Viable
KN34	12		Not Viable
KN35	10		Not Viable
KN36	572		Not Viable
CA2		1849	
CW03	368		Not Viable
CW04	75		Not Viable
CW05	56		Not Viable
CW06	19		Not Viable
CW07	5		Not Viable
CW08	3		Not Viable
CW09	336		Not Viable
CW10	268		Not Viable
CW11	206		Not Viable
CW12	94		Not Viable
CW13	83		Not Viable
CW14	65		Not Viable
CW15	46		Not Viable
CW16	43		Not Viable
CW17	77		Not Viable
CW18	28		Not Viable
CW19	16		Not Viable
CW20	16		Not Viable
CW21	16		Not Viable
CW22	15		Not Viable
CW23	14		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
CA3			
SU02	32		Not Viable
SU03	500		Not Viable
SU04	355		Not Viable
SU05	116		Not Viable
SU06	100		Not Viable
SU07	284		Not Viable
SU08	225		Not Viable
SU09	229		Not Viable
SU10	34		Not Viable
SU11	118		Not Viable
SU12	216		Not Viable
SU13	120		Not Viable
SU14	118		Not Viable
SU15	27	3998	Not Viable
SU16	93		Not Viable
SU17	88		Not Viable
SU18	85		Not Viable
SU19	84		Not Viable
SU20	61		Not Viable
SU21	58		Not Viable
SU22	58		Not Viable
SU23	56		Not Viable
SU24	48		Not Viable
SU25	48		Not Viable
SU26	45		Not Viable
SU27	23		Not Viable
SU28	43		Not Viable
SU29	47		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SU30	22	2101	Not Viable	
SU31	39		Not Viable	
SU32	39		Not Viable	
SU33	38		Not Viable	
SU34	77		Not Viable	
SU35	20		Not Viable	
SU36	20		Not Viable	
SU37	61		Not Viable	
SU38	29		Not Viable	
SU39	46		Not Viable	
SU40	26		Not Viable	
SU41	25		Not Viable	
SU42	57		Not Viable	
SU43	17		Not Viable	
SU44	22		Not Viable	
SU45	21		Not Viable	
SU46	21		Not Viable	
SU47	10		Not Viable	
SU48	20		Not Viable	
SU49	18		Not Viable	
SU50	18		Not Viable	
SU51	17		Not Viable	
SU52	13		Not Viable	
SU53	11		Not Viable	
CA4				
SV04	303		2101	Not Viable
SV05	42		2101	Not Viable
SV06	335		2101	Not Viable
SV07	149		2101	Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SV08	121		Not Viable	
SV09	117		Not Viable	
SV10	108		Not Viable	
SV11	102		Not Viable	
SV12	100		Not Viable	
SV13	96		Not Viable	
SV14	95		Not Viable	
SV15	89		Not Viable	
SV16	85		Not Viable	
SV17	75		Not Viable	
SV18	66		Not Viable	
SV19	58		Not Viable	
SV20	42		Not Viable	
SV21	40		Not Viable	
SV22	30		Not Viable	
SV23	22		Not Viable	
SV24	16		Not Viable	
SV25	10		Not Viable	
CA5				
HC03	1006		6095	Not Viable
HC04	100			Not Viable
HC05	52			Not Viable
HC06	9			Not Viable
HC07	1230			Not Viable
HC08	714			Not Viable
HC09	410	Not Viable		
HC10	364	Not Viable		
HC11	364	Not Viable		
HC12	298	Not Viable		

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
HC13	213		Not Viable	
HC14	162		Not Viable	
HC15	136		Not Viable	
HC16	135		Not Viable	
HC17	135		Not Viable	
HC18	101		Not Viable	
HC19	97		Not Viable	
HC20	95		Not Viable	
HC21	93		Not Viable	
HC22	92		Not Viable	
HC23	77		Not Viable	
HC24	46		Not Viable	
HC25	45		Not Viable	
HC26	45		Not Viable	
HC27	30		Not Viable	
HC28	22		Not Viable	
HC29	12		Not Viable	
HC30	12		Not Viable	
CA6				
LR01	466		1495	Not Viable
LR02	367			Not Viable
LR03	336			Not Viable
LR04	111			Not Viable
LR05	84			Not Viable
LR06	61			Not Viable
LR07	56			Not Viable
LR08	14			Not Viable
SA2				1005
NWS08	13			Viable range £0 - £20,000

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
NWS09	311	801	Viable range £0 - £20,000	
NWS10	169		Viable range £0 - £20,000	
NWS11	77		Viable range £0 - £20,000	
NWS12	76		Viable range £0 - £20,000	
NWS13	63		Viable range £0 - £20,000	
NWS14	48		Viable range £0 - £20,000	
NWS15	41		Viable range £0 - £20,000	
NWS16	32		Viable range £0 - £20,000	
NWS17	23		Viable range £0 - £20,000	
NWS18	22		Viable range £0 - £20,000	
NWS19	19		Viable range £0 - £20,000	
NWS20	14		Viable range £0 - £20,000	
NWS21	14		Viable range £0 - £20,000	
NWS22	14		Viable range £0 - £20,000	
NWS23	13		Viable range £0 - £20,000	
NWS24	13		Viable range £0 - £20,000	
NWS25	12		Viable range £0 - £20,000	
NWS26	11		Viable range £0 - £20,000	
NWS27	10		Viable range £0 - £20,000	
NWS28	10		Viable range £0 - £20,000	
SA3				
NES09	53			Not Viable
NES10	32			Not Viable
NES11	88			Not Viable
NES12	73			Not Viable
NES13	68			Not Viable
NES14	44			Not Viable
NES15	33			Not Viable
NES16	32		Not Viable	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
NES17	29		Not Viable
NES18	24		Not Viable
NES19	24		Not Viable
NES20	24		Not Viable
NES21	23		Not Viable
NES22	21		Not Viable
NES23	20		Not Viable
NES24	20		Not Viable
NES25	20		Not Viable
NES26	20		Not Viable
NES27	19		Not Viable
NES28	19		Not Viable
NES29	19		Not Viable
NES30	19		Not Viable
NES31	18		Not Viable
NES32	17		Not Viable
NES33	16		Not Viable
NES34	14		Not Viable
NES35	12		Not Viable
SA4			2899
ES20	80	Not Viable	
ES21	28	Not Viable	
ES22	596	Not Viable	
ES23	371	Not Viable	
ES24	210	Not Viable	
ES25	147	Not Viable	
ES26	121	Not Viable	
ES27	120	Not Viable	
ES28	116	Not Viable	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
ES29	101		Not Viable	
ES30	98		Not Viable	
ES31	93		Not Viable	
ES32	93		Not Viable	
ES33	82		Not Viable	
ES34	68		Not Viable	
ES35	63		Not Viable	
ES36	48		Not Viable	
ES37	47		Not Viable	
ES38	46		Not Viable	
ES39	42		Not Viable	
ES40	41		Not Viable	
ES41	39		Not Viable	
ES42	37		Not Viable	
ES43	35		Not Viable	
ES44	28		Not Viable	
ES45	26		Not Viable	
ES46	24		Not Viable	
ES47	17		Not Viable	
ES48	17		Not Viable	
ES49	16		Not Viable	
ES50	16		Not Viable	
ES51	12		Not Viable	
ES52	11		Not Viable	
ES53	10		Not Viable	
SA5				
SES08	272		1607	Not Viable
SES09	218			Not Viable
SES10	151	Not Viable		

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SES11	151	760	Not Viable	
SES12	90		Not Viable	
SES13	75		Not Viable	
SES14	74		Not Viable	
SES15	50		Not Viable	
SES16	34		Not Viable	
SES17	31		Not Viable	
SES18	28		Not Viable	
SES19	27		Not Viable	
SES20	27		Not Viable	
SES21	26		Not Viable	
SES22	21		Not Viable	
SES23	20		Not Viable	
SES24	19		Not Viable	
SES25	14		Not Viable	
SES26	11		Not Viable	
SES27	10		Not Viable	
SES28	258		Not Viable	
SA6				
SS01	52			Viable range £0 - £20,000
SS02	45			Viable range £0 - £20,000
SS03	44			Viable range £0 - £20,000
SS04	37			Viable range £0 - £20,000
SS05	33			Viable range £0 - £20,000
SS06	30			Viable range £0 - £20,000
SS07	28			Viable range £0 - £20,000
SS08	26			Viable range £0 - £20,000
SS09	22			Viable range £0 - £20,000
SS10	17		Viable range £0 - £20,000	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
SS11	14		Viable range £0 - £20,000
SS12	14		Viable range £0 - £20,000
SS13	14		Viable range £0 - £20,000
SS14	12		Viable range £0 - £20,000
SS15	11		Viable range £0 - £20,000
SS16	10		Viable range £0 - £20,000
SS17	270		Viable range £0 - £20,000
SS18	81		Viable range £0 - £20,000
SA7		938	
SWS01	15		Viable range £0 - £20,000
SWS02	369		Viable range £0 - £20,000
SWS03	184		Viable range £0 - £20,000
SWS04	60		Viable range £0 - £20,000
SWS05	59		Viable range £0 - £20,000
SWS06	43		Viable range £0 - £20,000
SWS07	39		Viable range £0 - £20,000
SWS08	38		Viable range £0 - £20,000
SWS09	27		Viable range £0 - £20,000
SWS10	14		Viable range £0 - £20,000
SWS11	14		Viable range £0 - £20,000
SWS12	14		Viable range £0 - £20,000
SWS13	14		Viable range £0 - £20,000
SWS14	13		Viable range £0 - £20,000
SWS15	13		Viable range £0 - £20,000
SWS16	12		Viable range £0 - £20,000
SWS17	10	Viable range £0 - £20,000	
SA8		914	
SD02	428		Not Viable
SD03	190		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SD05	85		Not Viable	
SD06	55		Not Viable	
SD07	34		Not Viable	
SD08	33		Not Viable	
SD09	33		Not Viable	
SD10	18		Not Viable	
SD11	14		Not Viable	
SD12	14		Not Viable	
SD13	10		Not Viable	
SA9			24	
CH01	14			Not Viable
CH02	10			Not Viable
	27,229		27229	
Not viable	24,526			
Viable	2,703			

2.0 OBJECTION TO POLICY CA5: SITE ALLOCATIONS IN HEART OF THE CITY, DIVISION STREET, THE MOOR, MILTON STREET, SPRINGFIELD, HANOVER STREET

a) Site Reference HC03: Land and buildings at St Mary's Gate and Eyre Street, S1 4QZ Total housing capacity: 1006 Homes

- 2.1 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.2 The requirement to provide Community, Commercial and/or Retail uses at ground floor level increases the complexity and cost of the scheme.
- 2.3 The provision of open space should be provided in accordance with Policy NC15 will have a financial and/or a spatial impact on the scheme.
- 2.4 The site is a Level 2 Strategic Flood Risk Assessment (SFRA) and is not deliverable until it passes an exception test.
- 2.5 The requirement to de-culvert and enhance the watercourse has costs and spatial implications for the site not taken into account in the general assessment.
- 2.6 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.7 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.8 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.9 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could have a considerable impact on the scale of development.
- 2.10 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.11 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.12 Action: Delete Allocation.

**b) Site Reference HC04: NCP Furnival Gate Car Park, Matilda Street, S1 4QY
Total housing capacity: 100 Homes**

- 2.13 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.14 The requirement to provide Community, Commercial and/or Retail uses at ground floor level increases the complexity and cost of the scheme.
- 2.15 The provision of open space should be provided in accordance with Policy NC15 will have a financial and/or a spatial impact on the scheme.
- 2.16 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.17 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.18 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.19 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.20 Action: Delete Allocation.

c) Site Reference HC05: 113-125, Pinstone Street, S1 2HL: 9 Homes

- 2.21 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.22 The requirement to provide a high level of office floor space adds complexity and cost to this small scheme.
- 2.23 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.24 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.25 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.26 Action: Delete Allocation.

**e) Site Reference HC08: Moorfoot Building, The Moor, S1 4PH
Total housing capacity: 714 Homes**

- 2.27 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.28 The site is presently occupied by Sheffield City Council and there is no evidence regarding the site's release.
- 2.29 The site is a Level 2 Strategic Flood Risk Assessment (SFRA) and is not deliverable until it passes an exception test.
- 2.30 The area of site is reduced as land within 1 in 25 and 1 in 100 probability of flooding (including climate change allowance) are not to be developed
- 2.31 The provision of open space to be provided in accordance with Policy NC15 will have a financial and/or a spatial impact on the scheme.
- 2.32 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.33 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.34 An underground National Grid power cable runs through part of the site. The impacts of this on potential redevelopment are unknown.
- 2.35 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable. For this scale and type of development.
- 2.36 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.37 Action: Delete Allocation.

f) Site Reference HC11: 3 Wickes, Young Street, S3 7UW: 364 Homes

- 2.38 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.39 The provision of open space to be provided in accordance with Policy NC15 will have a financial and/or a spatial impact on the scheme.
- 2.40 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.41 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.42 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.43 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.44 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.45 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.46 Action: Delete Allocation.

g) Site Reference HC15: Land and Buildings at Fitzwilliam Street, Egerton Street and Thomas Street, S1 4JR 136 Homes

- 2.47 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.48 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.49 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.50 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.51 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.52 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.53 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.54 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.55 Action: Delete Allocation.

- 2.56 **Site Reference HC16: Flocton House and Flocton Court, Rockingham Street, S1 4GH**
Total housing capacity: 135 Homes
- 2.57 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.58 The provision of open space to be provided in accordance with Policy NC15 will have a financial and/or a spatial impact on the scheme.
- 2.59 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.60 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.61 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.62 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could have a considerable impact on the scale of development.
- 2.63 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.64 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.65 Action: Delete Allocation.

h) Site Reference HC17: Car Park, Eldon Street, S3 7SF
Total housing capacity: 135 Homes

- 2.66 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.67 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.68 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.69 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.70 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.71 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable. For this scale and type of development.
- 2.72 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.73 Action: Delete Allocation.

- i) Site Reference HC22: Building adjacent to 20 Headford Street, S3 7WB: 92 Homes**
- 2.75 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.76 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.77 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.78 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could have a considerable impact on the scale of development.
- 2.79 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.80 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.81 Action: Delete Allocation.

j) Site Reference HC24 Buildings at Egerton Lane, S1 4AF: 46 Homes

- 2.82 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.83 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.84 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.85 The council consider it necessary to have a Heritage Statement that explains how potential archaeological impacts have been addressed. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.86 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.87 The requirement to retain the listed building complicates the scheme and adds to the cost.
- 2.88 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.89 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.90 Action: Delete Allocation.

k) Site Reference HC25: Milton Street Car Park, Milton Street, S3 7WJ: 45 Homes

- 2.91 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.92 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.93 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.94 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.95 The requirement to retain non-designated heritage assets complicates the scheme and adds to the cost.
- 2.96 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable. For this scale and type of development.
- 2.97 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.98 Action: Delete Allocation.

- I) Site Reference HC26: Land at Headford Street and Egerton Street, S3 7XF: 45 Homes**
- 2.99 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.100 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.101 The need to provide connectivity corridors/areas (including buffers) across the site as well as Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.102 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.103 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.104 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.105 Action: Delete allocation.



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RTPI

Chartered Town Planner



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, Grace Clarkson, Stuart Garnett and Marcus Jolly
Organisation (if applicable): Hallam Land Management, Strata Homes, Inspired Villages and Lime Developments Limited
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: CA5

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.



Strategic Planning Research Unit
A specialist team within DLP Planning Ltd

For and on behalf of
**Hallam Land Management
Inspired Villages
Limes Developments Limited
Strata Homes (Yorkshire)**

**Sheffield Local Plan
Regulation 19 Consultation**

Objection to Policy CA6

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

February 2023



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

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1.0 OBJECTIONS TO ALLOCATIONS IN POLICY CA6 ON GROUNDS OF VIABILITY

- 1.1 The Whole Plan Viability Assessment identifies the proposed allocations in policies CA1 to CA6 and SA 3,4, 5, 8 AND 9 as being unviable.
- 1.2 The table on the next pages applies the viability results from the Whole Plan Viability Assessment to the allocations and this highlights that allocations within these policies are unviable.
- 1.3 While each site will of course have its own circumstances and for these allocations to be sound the council will need to demonstrate that they are capable of being delivered, if they are to be included in the five year land supply from the date of adoption or at least deliverable within the plan period.
- 1.4 At present the evidence available for all the sites allocated in Policy CA6 is that they are unviable and not deliverable and as such it would be unsound to include these sites within the plan.

Table 1. Viability assessment of proposed allocations from the Whole Plan Viability Assessment

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
CA1			
KN03	191	2743	Not Viable
KN04	200		Not Viable
KN05	132		Not Viable
KN06	114		Not Viable
KN07	98		Not Viable
KN08	96		Not Viable
KN09	96		Not Viable
KN10	90		Not Viable
KN11	87		Not Viable
KN12	86		Not Viable
KN13	93		Not Viable
KN14	75		Not Viable
KN15	50		Not Viable
KN16	62		Not Viable
KN17	61		Not Viable
KN18	60		Not Viable
KN19	60		Not Viable
KN20	54		Not Viable
KN21	33		Not Viable
KN22	50		Not Viable
KN23	50		Not Viable
KN24	60		Not Viable
KN25	45		Not Viable
KN26	44		Not Viable
KN27	28		Not Viable
KN28	35		Not Viable
KN29	23		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
KN30	30		Not Viable
KN31	18		Not Viable
KN32	15		Not Viable
KN33	13		Not Viable
KN34	12		Not Viable
KN35	10		Not Viable
KN36	572		Not Viable
CA2		1849	
CW03	368		Not Viable
CW04	75		Not Viable
CW05	56		Not Viable
CW06	19		Not Viable
CW07	5		Not Viable
CW08	3		Not Viable
CW09	336		Not Viable
CW10	268		Not Viable
CW11	206		Not Viable
CW12	94		Not Viable
CW13	83		Not Viable
CW14	65		Not Viable
CW15	46		Not Viable
CW16	43		Not Viable
CW17	77		Not Viable
CW18	28		Not Viable
CW19	16		Not Viable
CW20	16		Not Viable
CW21	16		Not Viable
CW22	15		Not Viable
CW23	14		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
CA3			
SU02	32	3998	Not Viable
SU03	500		Not Viable
SU04	355		Not Viable
SU05	116		Not Viable
SU06	100		Not Viable
SU07	284		Not Viable
SU08	225		Not Viable
SU09	229		Not Viable
SU10	34		Not Viable
SU11	118		Not Viable
SU12	216		Not Viable
SU13	120		Not Viable
SU14	118		Not Viable
SU15	27		Not Viable
SU16	93		Not Viable
SU17	88		Not Viable
SU18	85		Not Viable
SU19	84		Not Viable
SU20	61		Not Viable
SU21	58		Not Viable
SU22	58		Not Viable
SU23	56		Not Viable
SU24	48		Not Viable
SU25	48		Not Viable
SU26	45		Not Viable
SU27	23		Not Viable
SU28	43		Not Viable
SU29	47		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SU30	22	2101	Not Viable	
SU31	39		Not Viable	
SU32	39		Not Viable	
SU33	38		Not Viable	
SU34	77		Not Viable	
SU35	20		Not Viable	
SU36	20		Not Viable	
SU37	61		Not Viable	
SU38	29		Not Viable	
SU39	46		Not Viable	
SU40	26		Not Viable	
SU41	25		Not Viable	
SU42	57		Not Viable	
SU43	17		Not Viable	
SU44	22		Not Viable	
SU45	21		Not Viable	
SU46	21		Not Viable	
SU47	10		Not Viable	
SU48	20		Not Viable	
SU49	18		Not Viable	
SU50	18		Not Viable	
SU51	17		Not Viable	
SU52	13		Not Viable	
SU53	11		Not Viable	
CA4				
SV04	303		2101	Not Viable
SV05	42		2101	Not Viable
SV06	335		2101	Not Viable
SV07	149		2101	Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SV08	121	6095	Not Viable	
SV09	117		Not Viable	
SV10	108		Not Viable	
SV11	102		Not Viable	
SV12	100		Not Viable	
SV13	96		Not Viable	
SV14	95		Not Viable	
SV15	89		Not Viable	
SV16	85		Not Viable	
SV17	75		Not Viable	
SV18	66		Not Viable	
SV19	58		Not Viable	
SV20	42		Not Viable	
SV21	40		Not Viable	
SV22	30		Not Viable	
SV23	22		Not Viable	
SV24	16		Not Viable	
SV25	10		Not Viable	
CA5				
HC03	1006		6095	Not Viable
HC04	100			Not Viable
HC05	52			Not Viable
HC06	9			Not Viable
HC07	1230			Not Viable
HC08	714			Not Viable
HC09	410	Not Viable		
HC10	364	Not Viable		
HC11	364	Not Viable		
HC12	298	Not Viable		

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
HC13	213		Not Viable	
HC14	162		Not Viable	
HC15	136		Not Viable	
HC16	135		Not Viable	
HC17	135		Not Viable	
HC18	101		Not Viable	
HC19	97		Not Viable	
HC20	95		Not Viable	
HC21	93		Not Viable	
HC22	92		Not Viable	
HC23	77		Not Viable	
HC24	46		Not Viable	
HC25	45		Not Viable	
HC26	45		Not Viable	
HC27	30		Not Viable	
HC28	22		Not Viable	
HC29	12		Not Viable	
HC30	12		Not Viable	
CA6				
LR01	466		1495	Not Viable
LR02	367			Not Viable
LR03	336			Not Viable
LR04	111			Not Viable
LR05	84			Not Viable
LR06	61			Not Viable
LR07	56			Not Viable
LR08	14			Not Viable
SA2				1005
NWS08	13			Viable range £0 - £20,000

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
NWS09	311	801	Viable range £0 - £20,000	
NWS10	169		Viable range £0 - £20,000	
NWS11	77		Viable range £0 - £20,000	
NWS12	76		Viable range £0 - £20,000	
NWS13	63		Viable range £0 - £20,000	
NWS14	48		Viable range £0 - £20,000	
NWS15	41		Viable range £0 - £20,000	
NWS16	32		Viable range £0 - £20,000	
NWS17	23		Viable range £0 - £20,000	
NWS18	22		Viable range £0 - £20,000	
NWS19	19		Viable range £0 - £20,000	
NWS20	14		Viable range £0 - £20,000	
NWS21	14		Viable range £0 - £20,000	
NWS22	14		Viable range £0 - £20,000	
NWS23	13		Viable range £0 - £20,000	
NWS24	13		Viable range £0 - £20,000	
NWS25	12		Viable range £0 - £20,000	
NWS26	11		Viable range £0 - £20,000	
NWS27	10		Viable range £0 - £20,000	
NWS28	10		Viable range £0 - £20,000	
SA3				
NES09	53			Not Viable
NES10	32			Not Viable
NES11	88			Not Viable
NES12	73			Not Viable
NES13	68			Not Viable
NES14	44			Not Viable
NES15	33			Not Viable
NES16	32		Not Viable	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
NES17	29		Not Viable
NES18	24		Not Viable
NES19	24		Not Viable
NES20	24		Not Viable
NES21	23		Not Viable
NES22	21		Not Viable
NES23	20		Not Viable
NES24	20		Not Viable
NES25	20		Not Viable
NES26	20		Not Viable
NES27	19		Not Viable
NES28	19		Not Viable
NES29	19		Not Viable
NES30	19		Not Viable
NES31	18		Not Viable
NES32	17		Not Viable
NES33	16		Not Viable
NES34	14		Not Viable
NES35	12		Not Viable
SA4			2899
ES20	80	Not Viable	
ES21	28	Not Viable	
ES22	596	Not Viable	
ES23	371	Not Viable	
ES24	210	Not Viable	
ES25	147	Not Viable	
ES26	121	Not Viable	
ES27	120	Not Viable	
ES28	116	Not Viable	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
ES29	101		Not Viable	
ES30	98		Not Viable	
ES31	93		Not Viable	
ES32	93		Not Viable	
ES33	82		Not Viable	
ES34	68		Not Viable	
ES35	63		Not Viable	
ES36	48		Not Viable	
ES37	47		Not Viable	
ES38	46		Not Viable	
ES39	42		Not Viable	
ES40	41		Not Viable	
ES41	39		Not Viable	
ES42	37		Not Viable	
ES43	35		Not Viable	
ES44	28		Not Viable	
ES45	26		Not Viable	
ES46	24		Not Viable	
ES47	17		Not Viable	
ES48	17		Not Viable	
ES49	16		Not Viable	
ES50	16		Not Viable	
ES51	12		Not Viable	
ES52	11		Not Viable	
ES53	10		Not Viable	
SA5			1607	
SES08	272			Not Viable
SES09	218			Not Viable
SES10	151			Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SES11	151	760	Not Viable	
SES12	90		Not Viable	
SES13	75		Not Viable	
SES14	74		Not Viable	
SES15	50		Not Viable	
SES16	34		Not Viable	
SES17	31		Not Viable	
SES18	28		Not Viable	
SES19	27		Not Viable	
SES20	27		Not Viable	
SES21	26		Not Viable	
SES22	21		Not Viable	
SES23	20		Not Viable	
SES24	19		Not Viable	
SES25	14		Not Viable	
SES26	11		Not Viable	
SES27	10		Not Viable	
SES28	258		Not Viable	
SA6				
SS01	52		760	Viable range £0 - £20,000
SS02	45		760	Viable range £0 - £20,000
SS03	44		760	Viable range £0 - £20,000
SS04	37		760	Viable range £0 - £20,000
SS05	33		760	Viable range £0 - £20,000
SS06	30		760	Viable range £0 - £20,000
SS07	28		760	Viable range £0 - £20,000
SS08	26		760	Viable range £0 - £20,000
SS09	22		760	Viable range £0 - £20,000
SS10	17	760	Viable range £0 - £20,000	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
SS11	14		Viable range £0 - £20,000
SS12	14		Viable range £0 - £20,000
SS13	14		Viable range £0 - £20,000
SS14	12		Viable range £0 - £20,000
SS15	11		Viable range £0 - £20,000
SS16	10		Viable range £0 - £20,000
SS17	270		Viable range £0 - £20,000
SS18	81		Viable range £0 - £20,000
SA7		938	
SWS01	15		Viable range £0 - £20,000
SWS02	369		Viable range £0 - £20,000
SWS03	184		Viable range £0 - £20,000
SWS04	60		Viable range £0 - £20,000
SWS05	59		Viable range £0 - £20,000
SWS06	43		Viable range £0 - £20,000
SWS07	39		Viable range £0 - £20,000
SWS08	38		Viable range £0 - £20,000
SWS09	27		Viable range £0 - £20,000
SWS10	14		Viable range £0 - £20,000
SWS11	14		Viable range £0 - £20,000
SWS12	14		Viable range £0 - £20,000
SWS13	14		Viable range £0 - £20,000
SWS14	13		Viable range £0 - £20,000
SWS15	13		Viable range £0 - £20,000
SWS16	12		Viable range £0 - £20,000
SWS17	10	Viable range £0 - £20,000	
SA8		914	
SD02	428		Not Viable
SD03	190		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SD05	85		Not Viable	
SD06	55		Not Viable	
SD07	34		Not Viable	
SD08	33		Not Viable	
SD09	33		Not Viable	
SD10	18		Not Viable	
SD11	14		Not Viable	
SD12	14		Not Viable	
SD13	10		Not Viable	
SA9				
CH01	14		24	Not Viable
CH02	10			Not Viable
	27,229		27229	
Not viable	24,526			
Viable	2,703			

2.0 OBJECTION TO POLICY CA6: - SITE ALLOCATIONS IN LONDON ROAD & QUEENS ROAD

- a) Site Reference: LR01 Address: B&Q Warehouse, Queens Road S2 3PS – 466 Homes**
- 2.1 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
 - 2.2 The site is a Level 2 Strategic Flood Risk Assessment (SFRA) and is not deliverable until it passes an exception test.
 - 2.3 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
 - 2.4 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
 - 2.5 Action: Delete Allocation.

b) Site Reference: LR02 Address: Buildings at Sheaf Gardens and Manton Street S2 4BA – 367 Homes

- 2.6 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.7 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.8 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.9 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.10 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location, which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.11 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.12 Action: Delete Allocation.

- c) Site Reference: LR04 Address: Grosvenor Casino, Duchess Road S2 4DR – 111 Homes**
- 2.13 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
 - 2.14 The site is a Level 2 Strategic Flood Risk Assessment (SFRA) and is not deliverable until it passes an exception test.
 - 2.15 The extent of land contamination is unknown, as is the nature and costs of any mitigation and/or remediation.
 - 2.16 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
 - 2.17 Action: Delete Allocation.

- d) Site Reference: LR05 Address: Buildings at Duchess Road and Edmund Road S2 4AW – 84 Homes**
- 2.18 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.19 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.20 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.21 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.22 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could have a considerable impact on the scale of development.
- 2.23 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs this is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.24 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.25 Action: Delete Allocation.

- e) Site Reference: LR07 Address: Wheatsheaf Works, 55-57 John Street S2 4QS – 56 Homes**
- 2.26 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.27 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.28 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.29 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc and which could have a considerable impact on the scale of development.
- 2.30 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs this is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.31 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.32 Action: Delete Allocation.

f) Site Reference: LR08 Address: 89 London Road S2 4LE – 14 Homes

- 2.33 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.34 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.35 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.36 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.37 Action: Delete Allocation.



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Chartered Town Planner



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

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: CA6

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.



Strategic Planning Research Unit
A specialist team within DLP Planning Ltd

For and on behalf of
**Hallam Land Management
Inspired Villages
Limes Developments Limited
Strata Homes (Yorkshire)**

**Sheffield Local Plan
Regulation 19 Consultation**

Objection to Policy SA2

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

February 2023



Prepared by:	Roland G Bolton BSc (Hons) MRPTI Senior Director
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1.0 OBJECTIONS TO ALLOCATIONS IN POLICY SA2 ON GROUNDS OF VIABILITY

- 1.1 The Whole Plan Viability Assessment identifies the proposed allocations in policies CA1 to CA6 and SA 3,4, 5, 8 AND 9 as being unviable.
- 1.2 The table on the next pages applies the viability results from the Whole Plan Viability Assessment to the allocations and this highlights that allocations within these policies are unviable.
- 1.3 While each site will of course have its own circumstances and for these allocations to be sound the council will need to demonstrate that they are capable of being delivered, if they are to be included in the five year land supply from the date of adoption or at least deliverable within the plan period.
- 1.4 At present the evidence available for all the sites allocated in Policy SA2 is that they are unviable and not deliverable and as such it would be unsound to include these sites within the plan.

Table 1. Viability assessment of proposed allocations from the Whole Plan Viability Assessment

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
CA1			
KN03	191	2743	Not Viable
KN04	200		Not Viable
KN05	132		Not Viable
KN06	114		Not Viable
KN07	98		Not Viable
KN08	96		Not Viable
KN09	96		Not Viable
KN10	90		Not Viable
KN11	87		Not Viable
KN12	86		Not Viable
KN13	93		Not Viable
KN14	75		Not Viable
KN15	50		Not Viable
KN16	62		Not Viable
KN17	61		Not Viable
KN18	60		Not Viable
KN19	60		Not Viable
KN20	54		Not Viable
KN21	33		Not Viable
KN22	50		Not Viable
KN23	50		Not Viable
KN24	60		Not Viable
KN25	45		Not Viable
KN26	44		Not Viable
KN27	28		Not Viable
KN28	35		Not Viable
KN29	23		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
KN30	30		Not Viable
KN31	18		Not Viable
KN32	15		Not Viable
KN33	13		Not Viable
KN34	12		Not Viable
KN35	10		Not Viable
KN36	572		Not Viable
CA2		1849	
CW03	368		Not Viable
CW04	75		Not Viable
CW05	56		Not Viable
CW06	19		Not Viable
CW07	5		Not Viable
CW08	3		Not Viable
CW09	336		Not Viable
CW10	268		Not Viable
CW11	206		Not Viable
CW12	94		Not Viable
CW13	83		Not Viable
CW14	65		Not Viable
CW15	46		Not Viable
CW16	43		Not Viable
CW17	77		Not Viable
CW18	28		Not Viable
CW19	16		Not Viable
CW20	16		Not Viable
CW21	16		Not Viable
CW22	15		Not Viable
CW23	14		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
CA3			
SU02	32		Not Viable
SU03	500		Not Viable
SU04	355		Not Viable
SU05	116		Not Viable
SU06	100		Not Viable
SU07	284		Not Viable
SU08	225		Not Viable
SU09	229		Not Viable
SU10	34		Not Viable
SU11	118		Not Viable
SU12	216		Not Viable
SU13	120		Not Viable
SU14	118		Not Viable
SU15	27	3998	Not Viable
SU16	93		Not Viable
SU17	88		Not Viable
SU18	85		Not Viable
SU19	84		Not Viable
SU20	61		Not Viable
SU21	58		Not Viable
SU22	58		Not Viable
SU23	56		Not Viable
SU24	48		Not Viable
SU25	48		Not Viable
SU26	45		Not Viable
SU27	23		Not Viable
SU28	43		Not Viable
SU29	47		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SU30	22	2101	Not Viable	
SU31	39		Not Viable	
SU32	39		Not Viable	
SU33	38		Not Viable	
SU34	77		Not Viable	
SU35	20		Not Viable	
SU36	20		Not Viable	
SU37	61		Not Viable	
SU38	29		Not Viable	
SU39	46		Not Viable	
SU40	26		Not Viable	
SU41	25		Not Viable	
SU42	57		Not Viable	
SU43	17		Not Viable	
SU44	22		Not Viable	
SU45	21		Not Viable	
SU46	21		Not Viable	
SU47	10		Not Viable	
SU48	20		Not Viable	
SU49	18		Not Viable	
SU50	18		Not Viable	
SU51	17		Not Viable	
SU52	13		Not Viable	
SU53	11		Not Viable	
CA4				
SV04	303		2101	Not Viable
SV05	42		2101	Not Viable
SV06	335		2101	Not Viable
SV07	149		2101	Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SV08	121	6095	Not Viable	
SV09	117		Not Viable	
SV10	108		Not Viable	
SV11	102		Not Viable	
SV12	100		Not Viable	
SV13	96		Not Viable	
SV14	95		Not Viable	
SV15	89		Not Viable	
SV16	85		Not Viable	
SV17	75		Not Viable	
SV18	66		Not Viable	
SV19	58		Not Viable	
SV20	42		Not Viable	
SV21	40		Not Viable	
SV22	30		Not Viable	
SV23	22		Not Viable	
SV24	16		Not Viable	
SV25	10		Not Viable	
CA5				
HC03	1006			Not Viable
HC04	100			Not Viable
HC05	52			Not Viable
HC06	9			Not Viable
HC07	1230			Not Viable
HC08	714			Not Viable
HC09	410		Not Viable	
HC10	364		Not Viable	
HC11	364		Not Viable	
HC12	298		Not Viable	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
HC13	213		Not Viable	
HC14	162		Not Viable	
HC15	136		Not Viable	
HC16	135		Not Viable	
HC17	135		Not Viable	
HC18	101		Not Viable	
HC19	97		Not Viable	
HC20	95		Not Viable	
HC21	93		Not Viable	
HC22	92		Not Viable	
HC23	77		Not Viable	
HC24	46		Not Viable	
HC25	45		Not Viable	
HC26	45		Not Viable	
HC27	30		Not Viable	
HC28	22		Not Viable	
HC29	12		Not Viable	
HC30	12		Not Viable	
CA6				
LR01	466		1495	Not Viable
LR02	367			Not Viable
LR03	336			Not Viable
LR04	111			Not Viable
LR05	84			Not Viable
LR06	61			Not Viable
LR07	56			Not Viable
LR08	14			Not Viable
SA2				1005
NWS08	13			Viable range £0 - £20,000

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
NWS09	311	801	Viable range £0 - £20,000	
NWS10	169		Viable range £0 - £20,000	
NWS11	77		Viable range £0 - £20,000	
NWS12	76		Viable range £0 - £20,000	
NWS13	63		Viable range £0 - £20,000	
NWS14	48		Viable range £0 - £20,000	
NWS15	41		Viable range £0 - £20,000	
NWS16	32		Viable range £0 - £20,000	
NWS17	23		Viable range £0 - £20,000	
NWS18	22		Viable range £0 - £20,000	
NWS19	19		Viable range £0 - £20,000	
NWS20	14		Viable range £0 - £20,000	
NWS21	14		Viable range £0 - £20,000	
NWS22	14		Viable range £0 - £20,000	
NWS23	13		Viable range £0 - £20,000	
NWS24	13		Viable range £0 - £20,000	
NWS25	12		Viable range £0 - £20,000	
NWS26	11		Viable range £0 - £20,000	
NWS27	10		Viable range £0 - £20,000	
NWS28	10		Viable range £0 - £20,000	
SA3				
NES09	53			Not Viable
NES10	32			Not Viable
NES11	88			Not Viable
NES12	73			Not Viable
NES13	68			Not Viable
NES14	44			Not Viable
NES15	33			Not Viable
NES16	32		Not Viable	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
NES17	29		Not Viable
NES18	24		Not Viable
NES19	24		Not Viable
NES20	24		Not Viable
NES21	23		Not Viable
NES22	21		Not Viable
NES23	20		Not Viable
NES24	20		Not Viable
NES25	20		Not Viable
NES26	20		Not Viable
NES27	19		Not Viable
NES28	19		Not Viable
NES29	19		Not Viable
NES30	19		Not Viable
NES31	18		Not Viable
NES32	17		Not Viable
NES33	16		Not Viable
NES34	14		Not Viable
NES35	12		Not Viable
SA4			
ES20	80	2899	Not Viable
ES21	28		Not Viable
ES22	596		Not Viable
ES23	371		Not Viable
ES24	210		Not Viable
ES25	147		Not Viable
ES26	121		Not Viable
ES27	120		Not Viable
ES28	116		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
ES29	101		Not Viable	
ES30	98		Not Viable	
ES31	93		Not Viable	
ES32	93		Not Viable	
ES33	82		Not Viable	
ES34	68		Not Viable	
ES35	63		Not Viable	
ES36	48		Not Viable	
ES37	47		Not Viable	
ES38	46		Not Viable	
ES39	42		Not Viable	
ES40	41		Not Viable	
ES41	39		Not Viable	
ES42	37		Not Viable	
ES43	35		Not Viable	
ES44	28		Not Viable	
ES45	26		Not Viable	
ES46	24		Not Viable	
ES47	17		Not Viable	
ES48	17		Not Viable	
ES49	16		Not Viable	
ES50	16		Not Viable	
ES51	12		Not Viable	
ES52	11		Not Viable	
ES53	10		Not Viable	
SA5				
SES08	272		1607	Not Viable
SES09	218			Not Viable
SES10	151			Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SES11	151	760	Not Viable	
SES12	90		Not Viable	
SES13	75		Not Viable	
SES14	74		Not Viable	
SES15	50		Not Viable	
SES16	34		Not Viable	
SES17	31		Not Viable	
SES18	28		Not Viable	
SES19	27		Not Viable	
SES20	27		Not Viable	
SES21	26		Not Viable	
SES22	21		Not Viable	
SES23	20		Not Viable	
SES24	19		Not Viable	
SES25	14		Not Viable	
SES26	11		Not Viable	
SES27	10		Not Viable	
SES28	258		Not Viable	
SA6				
SS01	52			Viable range £0 - £20,000
SS02	45			Viable range £0 - £20,000
SS03	44			Viable range £0 - £20,000
SS04	37			Viable range £0 - £20,000
SS05	33			Viable range £0 - £20,000
SS06	30			Viable range £0 - £20,000
SS07	28			Viable range £0 - £20,000
SS08	26			Viable range £0 - £20,000
SS09	22			Viable range £0 - £20,000
SS10	17		Viable range £0 - £20,000	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
SS11	14		Viable range £0 - £20,000
SS12	14		Viable range £0 - £20,000
SS13	14		Viable range £0 - £20,000
SS14	12		Viable range £0 - £20,000
SS15	11		Viable range £0 - £20,000
SS16	10		Viable range £0 - £20,000
SS17	270		Viable range £0 - £20,000
SS18	81		Viable range £0 - £20,000
SA7		938	
SWS01	15		Viable range £0 - £20,000
SWS02	369		Viable range £0 - £20,000
SWS03	184		Viable range £0 - £20,000
SWS04	60		Viable range £0 - £20,000
SWS05	59		Viable range £0 - £20,000
SWS06	43		Viable range £0 - £20,000
SWS07	39		Viable range £0 - £20,000
SWS08	38		Viable range £0 - £20,000
SWS09	27		Viable range £0 - £20,000
SWS10	14		Viable range £0 - £20,000
SWS11	14		Viable range £0 - £20,000
SWS12	14		Viable range £0 - £20,000
SWS13	14		Viable range £0 - £20,000
SWS14	13		Viable range £0 - £20,000
SWS15	13		Viable range £0 - £20,000
SWS16	12		Viable range £0 - £20,000
SWS17	10	Viable range £0 - £20,000	
SA8		914	
SD02	428		Not Viable
SD03	190		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SD05	85		Not Viable	
SD06	55		Not Viable	
SD07	34		Not Viable	
SD08	33		Not Viable	
SD09	33		Not Viable	
SD10	18		Not Viable	
SD11	14		Not Viable	
SD12	14		Not Viable	
SD13	10		Not Viable	
SA9			24	
CH01	14			Not Viable
CH02	10			Not Viable
	27,229		27229	
Not viable	24,526			
Viable	2,703			

2.0 OBJECTION TO POLICY SA2: SITE ALLOCATIONS IN NORTHWEST SHEFFIELD SUB-AREA

a) Site Reference: NWS10 Address: Land at Oughtibridge Lane and Platts Lane S35 0HN – 169 Homes

- 2.1 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.2 The site is a Level 2 Strategic Flood Risk Assessment (SFRA) and is not deliverable until it passes an exception test.
- 2.3 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.4 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.5 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.6 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.7 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.8 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.9 Action: Delete Allocation.

b) Site Reference: NWS13 Address: Wiggan Farm S35 0AR

- 2.10 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.11 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.12 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.13 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.14 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 2.15 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.16 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.17 Action: Delete Allocation.

c) Site Reference: NW19 Address: Former Bolehill Residential Home, Bolehill View S10 1QL – 19 Homes

- 2.18 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.19 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.20 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.21 Action: Delete Allocation.



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RTPI
Chartered Town Planner



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, Grace Clarkson, Stuart Garnett and Marcus Jolly
Organisation (if applicable): Hallam Land Management, Strata Homes, Inspired Villages and Lime Developments Limited
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: SA2

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.



Strategic Planning Research Unit
A specialist team within DLP Planning Ltd

For and on behalf of
**Hallam Land Management
Inspired Villages
Limes Developments Limited
Strata Homes (Yorkshire)**

**Sheffield Local Plan
Regulation 19 Consultation**

Objection to Policy SA3

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

February 2023



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

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1.0 OBJECTIONS TO ALLOCATIONS IN POLICY SA3 ON GROUNDS OF VIABILITY

- 1.1 The Whole Plan Viability Assessment identifies the proposed allocations in policies CA1 to CA6 and SA 3,4, 5, 8 AND 9 as being unviable.
- 1.2 The table on the next pages applies the viability results from the Whole Plan Viability Assessment to the allocations and this highlights that allocations within these policies are unviable.
- 1.3 While each site will of course have its own circumstances and for these allocations to be sound the council will need to demonstrate that they are capable of being delivered, if they are to be included in the five year land supply from the date of adoption or at least deliverable within the plan period.
- 1.4 At present the evidence available for all the sites allocated in Policy SA3 is that they are unviable and not deliverable and as such it would be unsound to include these sites within the plan.

Table 1. Viability assessment of proposed allocations from the Whole Plan Viability Assessment

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
CA1			
KN03	191	2743	Not Viable
KN04	200		Not Viable
KN05	132		Not Viable
KN06	114		Not Viable
KN07	98		Not Viable
KN08	96		Not Viable
KN09	96		Not Viable
KN10	90		Not Viable
KN11	87		Not Viable
KN12	86		Not Viable
KN13	93		Not Viable
KN14	75		Not Viable
KN15	50		Not Viable
KN16	62		Not Viable
KN17	61		Not Viable
KN18	60		Not Viable
KN19	60		Not Viable
KN20	54		Not Viable
KN21	33		Not Viable
KN22	50		Not Viable
KN23	50		Not Viable
KN24	60		Not Viable
KN25	45		Not Viable
KN26	44		Not Viable
KN27	28		Not Viable
KN28	35		Not Viable
KN29	23		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
KN30	30		Not Viable
KN31	18		Not Viable
KN32	15		Not Viable
KN33	13		Not Viable
KN34	12		Not Viable
KN35	10		Not Viable
KN36	572		Not Viable
CA2		1849	
CW03	368		Not Viable
CW04	75		Not Viable
CW05	56		Not Viable
CW06	19		Not Viable
CW07	5		Not Viable
CW08	3		Not Viable
CW09	336		Not Viable
CW10	268		Not Viable
CW11	206		Not Viable
CW12	94		Not Viable
CW13	83		Not Viable
CW14	65		Not Viable
CW15	46		Not Viable
CW16	43		Not Viable
CW17	77		Not Viable
CW18	28		Not Viable
CW19	16		Not Viable
CW20	16		Not Viable
CW21	16		Not Viable
CW22	15		Not Viable
CW23	14		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
CA3			
SU02	32		Not Viable
SU03	500		Not Viable
SU04	355		Not Viable
SU05	116		Not Viable
SU06	100		Not Viable
SU07	284		Not Viable
SU08	225		Not Viable
SU09	229		Not Viable
SU10	34		Not Viable
SU11	118		Not Viable
SU12	216		Not Viable
SU13	120		Not Viable
SU14	118		Not Viable
SU15	27	3998	Not Viable
SU16	93		Not Viable
SU17	88		Not Viable
SU18	85		Not Viable
SU19	84		Not Viable
SU20	61		Not Viable
SU21	58		Not Viable
SU22	58		Not Viable
SU23	56		Not Viable
SU24	48		Not Viable
SU25	48		Not Viable
SU26	45		Not Viable
SU27	23		Not Viable
SU28	43		Not Viable
SU29	47		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SU30	22	2101	Not Viable	
SU31	39		Not Viable	
SU32	39		Not Viable	
SU33	38		Not Viable	
SU34	77		Not Viable	
SU35	20		Not Viable	
SU36	20		Not Viable	
SU37	61		Not Viable	
SU38	29		Not Viable	
SU39	46		Not Viable	
SU40	26		Not Viable	
SU41	25		Not Viable	
SU42	57		Not Viable	
SU43	17		Not Viable	
SU44	22		Not Viable	
SU45	21		Not Viable	
SU46	21		Not Viable	
SU47	10		Not Viable	
SU48	20		Not Viable	
SU49	18		Not Viable	
SU50	18		Not Viable	
SU51	17		Not Viable	
SU52	13		Not Viable	
SU53	11		Not Viable	
CA4				
SV04	303			Not Viable
SV05	42			Not Viable
SV06	335			Not Viable
SV07	149			Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SV08	121	6095	Not Viable	
SV09	117		Not Viable	
SV10	108		Not Viable	
SV11	102		Not Viable	
SV12	100		Not Viable	
SV13	96		Not Viable	
SV14	95		Not Viable	
SV15	89		Not Viable	
SV16	85		Not Viable	
SV17	75		Not Viable	
SV18	66		Not Viable	
SV19	58		Not Viable	
SV20	42		Not Viable	
SV21	40		Not Viable	
SV22	30		Not Viable	
SV23	22		Not Viable	
SV24	16		Not Viable	
SV25	10		Not Viable	
CA5				
HC03	1006			Not Viable
HC04	100			Not Viable
HC05	52			Not Viable
HC06	9			Not Viable
HC07	1230			Not Viable
HC08	714			Not Viable
HC09	410		Not Viable	
HC10	364		Not Viable	
HC11	364		Not Viable	
HC12	298		Not Viable	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
HC13	213		Not Viable	
HC14	162		Not Viable	
HC15	136		Not Viable	
HC16	135		Not Viable	
HC17	135		Not Viable	
HC18	101		Not Viable	
HC19	97		Not Viable	
HC20	95		Not Viable	
HC21	93		Not Viable	
HC22	92		Not Viable	
HC23	77		Not Viable	
HC24	46		Not Viable	
HC25	45		Not Viable	
HC26	45		Not Viable	
HC27	30		Not Viable	
HC28	22		Not Viable	
HC29	12		Not Viable	
HC30	12		Not Viable	
CA6				
LR01	466		1495	Not Viable
LR02	367			Not Viable
LR03	336			Not Viable
LR04	111			Not Viable
LR05	84			Not Viable
LR06	61			Not Viable
LR07	56			Not Viable
LR08	14			Not Viable
SA2				1005
NWS08	13			Viable range £0 - £20,000

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
NWS09	311	801	Viable range £0 - £20,000	
NWS10	169		Viable range £0 - £20,000	
NWS11	77		Viable range £0 - £20,000	
NWS12	76		Viable range £0 - £20,000	
NWS13	63		Viable range £0 - £20,000	
NWS14	48		Viable range £0 - £20,000	
NWS15	41		Viable range £0 - £20,000	
NWS16	32		Viable range £0 - £20,000	
NWS17	23		Viable range £0 - £20,000	
NWS18	22		Viable range £0 - £20,000	
NWS19	19		Viable range £0 - £20,000	
NWS20	14		Viable range £0 - £20,000	
NWS21	14		Viable range £0 - £20,000	
NWS22	14		Viable range £0 - £20,000	
NWS23	13		Viable range £0 - £20,000	
NWS24	13		Viable range £0 - £20,000	
NWS25	12		Viable range £0 - £20,000	
NWS26	11		Viable range £0 - £20,000	
NWS27	10		Viable range £0 - £20,000	
NWS28	10		Viable range £0 - £20,000	
SA3				
NES09	53			Not Viable
NES10	32			Not Viable
NES11	88			Not Viable
NES12	73			Not Viable
NES13	68			Not Viable
NES14	44			Not Viable
NES15	33			Not Viable
NES16	32		Not Viable	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
NES17	29	2899	Not Viable
NES18	24		Not Viable
NES19	24		Not Viable
NES20	24		Not Viable
NES21	23		Not Viable
NES22	21		Not Viable
NES23	20		Not Viable
NES24	20		Not Viable
NES25	20		Not Viable
NES26	20		Not Viable
NES27	19		Not Viable
NES28	19		Not Viable
NES29	19		Not Viable
NES30	19		Not Viable
NES31	18		Not Viable
NES32	17		Not Viable
NES33	16		Not Viable
NES34	14	Not Viable	
NES35	12	Not Viable	
SA4			
ES20	80	2899	Not Viable
ES21	28		Not Viable
ES22	596		Not Viable
ES23	371		Not Viable
ES24	210		Not Viable
ES25	147		Not Viable
ES26	121		Not Viable
ES27	120		Not Viable
ES28	116		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
ES29	101		Not Viable	
ES30	98		Not Viable	
ES31	93		Not Viable	
ES32	93		Not Viable	
ES33	82		Not Viable	
ES34	68		Not Viable	
ES35	63		Not Viable	
ES36	48		Not Viable	
ES37	47		Not Viable	
ES38	46		Not Viable	
ES39	42		Not Viable	
ES40	41		Not Viable	
ES41	39		Not Viable	
ES42	37		Not Viable	
ES43	35		Not Viable	
ES44	28		Not Viable	
ES45	26		Not Viable	
ES46	24		Not Viable	
ES47	17		Not Viable	
ES48	17		Not Viable	
ES49	16		Not Viable	
ES50	16		Not Viable	
ES51	12		Not Viable	
ES52	11		Not Viable	
ES53	10		Not Viable	
SA5				
SES08	272		1607	Not Viable
SES09	218			Not Viable
SES10	151			Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SES11	151	760	Not Viable	
SES12	90		Not Viable	
SES13	75		Not Viable	
SES14	74		Not Viable	
SES15	50		Not Viable	
SES16	34		Not Viable	
SES17	31		Not Viable	
SES18	28		Not Viable	
SES19	27		Not Viable	
SES20	27		Not Viable	
SES21	26		Not Viable	
SES22	21		Not Viable	
SES23	20		Not Viable	
SES24	19		Not Viable	
SES25	14		Not Viable	
SES26	11		Not Viable	
SES27	10		Not Viable	
SES28	258		Not Viable	
SA6				
SS01	52			Viable range £0 - £20,000
SS02	45			Viable range £0 - £20,000
SS03	44			Viable range £0 - £20,000
SS04	37			Viable range £0 - £20,000
SS05	33			Viable range £0 - £20,000
SS06	30			Viable range £0 - £20,000
SS07	28			Viable range £0 - £20,000
SS08	26			Viable range £0 - £20,000
SS09	22			Viable range £0 - £20,000
SS10	17		Viable range £0 - £20,000	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
SS11	14		Viable range £0 - £20,000
SS12	14		Viable range £0 - £20,000
SS13	14		Viable range £0 - £20,000
SS14	12		Viable range £0 - £20,000
SS15	11		Viable range £0 - £20,000
SS16	10		Viable range £0 - £20,000
SS17	270		Viable range £0 - £20,000
SS18	81		Viable range £0 - £20,000
SA7		938	
SWS01	15		Viable range £0 - £20,000
SWS02	369		Viable range £0 - £20,000
SWS03	184		Viable range £0 - £20,000
SWS04	60		Viable range £0 - £20,000
SWS05	59		Viable range £0 - £20,000
SWS06	43		Viable range £0 - £20,000
SWS07	39		Viable range £0 - £20,000
SWS08	38		Viable range £0 - £20,000
SWS09	27		Viable range £0 - £20,000
SWS10	14		Viable range £0 - £20,000
SWS11	14		Viable range £0 - £20,000
SWS12	14		Viable range £0 - £20,000
SWS13	14		Viable range £0 - £20,000
SWS14	13		Viable range £0 - £20,000
SWS15	13		Viable range £0 - £20,000
SWS16	12		Viable range £0 - £20,000
SWS17	10	Viable range £0 - £20,000	
SA8		914	
SD02	428		Not Viable
SD03	190		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SD05	85		Not Viable	
SD06	55		Not Viable	
SD07	34		Not Viable	
SD08	33		Not Viable	
SD09	33		Not Viable	
SD10	18		Not Viable	
SD11	14		Not Viable	
SD12	14		Not Viable	
SD13	10		Not Viable	
SA9			24	
CH01	14			Not Viable
CH02	10			Not Viable
	27,229		27229	
Not viable	24,526			
Viable	2,703			

2.0 OBJECTION TO POLICY SA3: SITE ALLOCATIONS IN NORTH-EAST SUB-AREA

a) Site Reference: NES09 Address: Rock Christian Centre Lighthouse and 105-125 Spital Hill S4 7LD – 53 Homes

- 2.1 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.2 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.3 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.4 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.5 Action: Delete Allocation.

b) Site Reference: NES12 Address: Land at Mansell Crescent S5 9QR – 73 Homes

- 2.6 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.7 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.8 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.9 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.10 Action: Delete Allocation.

- c) Site Reference: NES13 Address: Parsons Cross Park, Buchanan Road S5 7SA – 68 Homes**
- 2.11 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.12 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.13 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.14 Action: Delete Allocation.

d) Site Reference: NES16 Address: Land adjacent to Deerlands Avenue roundabout S5 7WY – 32 Homes

- 2.15 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.16 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.17 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.18 Action: Delete Allocation.

e) Site Reference: NES17 Address: Remington Youth Club, Remington Road S5 9BF – 29 Homes

- 2.19 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.20 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.21 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.22 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.23 Action: Delete Allocation.

f) Site Reference: NES18 Address: Land at Longley Hall Road S5 7JG – 24 Homes

- 2.24 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.25 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.26 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.27 Action: Delete Allocation.

g) Site Reference: NES20 Address: Land at Somerset Road and Richmond Street S3 9DB – 24 Homes

- 2.28 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.29 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.30 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.31 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.32 Action: Delete Allocation.

- h) Site Reference: NES22 Address: Land adjacent to Foxhill Recreation Ground S6 1GE – 21 Homes**
- 2.33 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.34 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.35 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.36 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could have a considerable impact on the scale of development.
- 2.37 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs this is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.38 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.39 Action: Delete Allocation.

i) Site Reference: NES27 Address: Land adjacent to 264 Deerlands Avenue S5 7WX

- 2.40 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.41 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.42 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.43 Action: Delete Allocation.

- j) Site Reference: NES28 Adress: Land adjacent to 177 Derlands Avenue S5 7WU – 19 Homes**
- 2.44 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.45 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.46 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.47 Action: Delete Allocation.

k) Site Reference: NES29 Address: Land at 16-42 Buchanan Road S5 8AL – 19 Homes

- 2.48 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.49 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.50 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.51 Action: Delete Allocation.

I) Site Reference: NES33 Address: Land at Wordsworth Avenue S5 9FP – 16 Homes

- 2.52 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.53 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.54 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.55 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.56 Action: Delete Allocation.



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RTPI
Chartered Town Planner



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, Grace Clarkson, Stuart Garnett and Marcus Jolly
Organisation (if applicable): Hallam Land Management, Strata Homes, Inspired Villages and Lime Developments Limited
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: SA3

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.



Strategic Planning Research Unit
A specialist team within DLP Planning Ltd

For and on behalf of
**Hallam Land Management
Inspired Villages
Limes Developments Limited
Strata Homes (Yorkshire)**

**Sheffield Local Plan
Regulation 19 Consultation**

Objection to Policy SA4

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

February 2023



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

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1.0 OBJECTIONS TO ALLOCATIONS IN POLICY SA4 ON GROUNDS OF VIABILITY

- 1.1 The Whole Plan Viability Assessment identifies the proposed allocations in policies CA1 to CA6 and SA 3,4, 5, 8 AND 9 as being unviable.
- 1.2 The table on the next pages applies the viability results from the Whole Plan Viability Assessment to the allocations and this highlights that allocations within these policies are unviable.
- 1.3 While each site will of course have its own circumstances and for these allocations to be sound the council will need to demonstrate that they are capable of being delivered, if they are to be included in the five year land supply from the date of adoption or at least deliverable within the plan period.
- 1.4 At present the evidence available for all the sites allocated in Policy SA4 is that they are unviable and not deliverable and as such it would be unsound to include these sites within the plan.

Table 1. Viability assessment of proposed allocations from the Whole Plan Viability assessment

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
CA1			
KN03	191	2743	Not Viable
KN04	200		Not Viable
KN05	132		Not Viable
KN06	114		Not Viable
KN07	98		Not Viable
KN08	96		Not Viable
KN09	96		Not Viable
KN10	90		Not Viable
KN11	87		Not Viable
KN12	86		Not Viable
KN13	93		Not Viable
KN14	75		Not Viable
KN15	50		Not Viable
KN16	62		Not Viable
KN17	61		Not Viable
KN18	60		Not Viable
KN19	60		Not Viable
KN20	54		Not Viable
KN21	33		Not Viable
KN22	50		Not Viable
KN23	50		Not Viable
KN24	60		Not Viable
KN25	45		Not Viable
KN26	44		Not Viable
KN27	28		Not Viable
KN28	35		Not Viable
KN29	23		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
KN30	30		Not Viable
KN31	18		Not Viable
KN32	15		Not Viable
KN33	13		Not Viable
KN34	12		Not Viable
KN35	10		Not Viable
KN36	572		Not Viable
CA2		1849	
CW03	368		Not Viable
CW04	75		Not Viable
CW05	56		Not Viable
CW06	19		Not Viable
CW07	5		Not Viable
CW08	3		Not Viable
CW09	336		Not Viable
CW10	268		Not Viable
CW11	206		Not Viable
CW12	94		Not Viable
CW13	83		Not Viable
CW14	65		Not Viable
CW15	46		Not Viable
CW16	43		Not Viable
CW17	77		Not Viable
CW18	28		Not Viable
CW19	16		Not Viable
CW20	16		Not Viable
CW21	16		Not Viable
CW22	15		Not Viable
CW23	14		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
CA3			
SU02	32		Not Viable
SU03	500		Not Viable
SU04	355		Not Viable
SU05	116		Not Viable
SU06	100		Not Viable
SU07	284		Not Viable
SU08	225		Not Viable
SU09	229		Not Viable
SU10	34		Not Viable
SU11	118		Not Viable
SU12	216		Not Viable
SU13	120		Not Viable
SU14	118		Not Viable
SU15	27	3998	Not Viable
SU16	93		Not Viable
SU17	88		Not Viable
SU18	85		Not Viable
SU19	84		Not Viable
SU20	61		Not Viable
SU21	58		Not Viable
SU22	58		Not Viable
SU23	56		Not Viable
SU24	48		Not Viable
SU25	48		Not Viable
SU26	45		Not Viable
SU27	23		Not Viable
SU28	43		Not Viable
SU29	47		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SU30	22	2101	Not Viable	
SU31	39		Not Viable	
SU32	39		Not Viable	
SU33	38		Not Viable	
SU34	77		Not Viable	
SU35	20		Not Viable	
SU36	20		Not Viable	
SU37	61		Not Viable	
SU38	29		Not Viable	
SU39	46		Not Viable	
SU40	26		Not Viable	
SU41	25		Not Viable	
SU42	57		Not Viable	
SU43	17		Not Viable	
SU44	22		Not Viable	
SU45	21		Not Viable	
SU46	21		Not Viable	
SU47	10		Not Viable	
SU48	20		Not Viable	
SU49	18		Not Viable	
SU50	18		Not Viable	
SU51	17		Not Viable	
SU52	13		Not Viable	
SU53	11		Not Viable	
CA4				
SV04	303		2101	Not Viable
SV05	42		2101	Not Viable
SV06	335		2101	Not Viable
SV07	149		2101	Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SV08	121	6095	Not Viable	
SV09	117		Not Viable	
SV10	108		Not Viable	
SV11	102		Not Viable	
SV12	100		Not Viable	
SV13	96		Not Viable	
SV14	95		Not Viable	
SV15	89		Not Viable	
SV16	85		Not Viable	
SV17	75		Not Viable	
SV18	66		Not Viable	
SV19	58		Not Viable	
SV20	42		Not Viable	
SV21	40		Not Viable	
SV22	30		Not Viable	
SV23	22		Not Viable	
SV24	16		Not Viable	
SV25	10		Not Viable	
CA5				
HC03	1006			Not Viable
HC04	100			Not Viable
HC05	52			Not Viable
HC06	9			Not Viable
HC07	1230			Not Viable
HC08	714			Not Viable
HC09	410		Not Viable	
HC10	364		Not Viable	
HC11	364		Not Viable	
HC12	298		Not Viable	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
HC13	213		Not Viable	
HC14	162		Not Viable	
HC15	136		Not Viable	
HC16	135		Not Viable	
HC17	135		Not Viable	
HC18	101		Not Viable	
HC19	97		Not Viable	
HC20	95		Not Viable	
HC21	93		Not Viable	
HC22	92		Not Viable	
HC23	77		Not Viable	
HC24	46		Not Viable	
HC25	45		Not Viable	
HC26	45		Not Viable	
HC27	30		Not Viable	
HC28	22		Not Viable	
HC29	12		Not Viable	
HC30	12		Not Viable	
CA6				
LR01	466		1495	Not Viable
LR02	367			Not Viable
LR03	336			Not Viable
LR04	111			Not Viable
LR05	84			Not Viable
LR06	61			Not Viable
LR07	56			Not Viable
LR08	14			Not Viable
SA2				1005
NWS08	13			Viable range £0 - £20,000

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
NWS09	311	801	Viable range £0 - £20,000	
NWS10	169		Viable range £0 - £20,000	
NWS11	77		Viable range £0 - £20,000	
NWS12	76		Viable range £0 - £20,000	
NWS13	63		Viable range £0 - £20,000	
NWS14	48		Viable range £0 - £20,000	
NWS15	41		Viable range £0 - £20,000	
NWS16	32		Viable range £0 - £20,000	
NWS17	23		Viable range £0 - £20,000	
NWS18	22		Viable range £0 - £20,000	
NWS19	19		Viable range £0 - £20,000	
NWS20	14		Viable range £0 - £20,000	
NWS21	14		Viable range £0 - £20,000	
NWS22	14		Viable range £0 - £20,000	
NWS23	13		Viable range £0 - £20,000	
NWS24	13		Viable range £0 - £20,000	
NWS25	12		Viable range £0 - £20,000	
NWS26	11		Viable range £0 - £20,000	
NWS27	10		Viable range £0 - £20,000	
NWS28	10		Viable range £0 - £20,000	
SA3				
NES09	53			Not Viable
NES10	32			Not Viable
NES11	88			Not Viable
NES12	73			Not Viable
NES13	68			Not Viable
NES14	44			Not Viable
NES15	33			Not Viable
NES16	32		Not Viable	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
NES17	29		Not Viable
NES18	24		Not Viable
NES19	24		Not Viable
NES20	24		Not Viable
NES21	23		Not Viable
NES22	21		Not Viable
NES23	20		Not Viable
NES24	20		Not Viable
NES25	20		Not Viable
NES26	20		Not Viable
NES27	19		Not Viable
NES28	19		Not Viable
NES29	19		Not Viable
NES30	19		Not Viable
NES31	18		Not Viable
NES32	17		Not Viable
NES33	16		Not Viable
NES34	14		Not Viable
NES35	12		Not Viable
SA4			2899
ES20	80	Not Viable	
ES21	28	Not Viable	
ES22	596	Not Viable	
ES23	371	Not Viable	
ES24	210	Not Viable	
ES25	147	Not Viable	
ES26	121	Not Viable	
ES27	120	Not Viable	
ES28	116	Not Viable	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
ES29	101		Not Viable	
ES30	98		Not Viable	
ES31	93		Not Viable	
ES32	93		Not Viable	
ES33	82		Not Viable	
ES34	68		Not Viable	
ES35	63		Not Viable	
ES36	48		Not Viable	
ES37	47		Not Viable	
ES38	46		Not Viable	
ES39	42		Not Viable	
ES40	41		Not Viable	
ES41	39		Not Viable	
ES42	37		Not Viable	
ES43	35		Not Viable	
ES44	28		Not Viable	
ES45	26		Not Viable	
ES46	24		Not Viable	
ES47	17		Not Viable	
ES48	17		Not Viable	
ES49	16		Not Viable	
ES50	16		Not Viable	
ES51	12		Not Viable	
ES52	11		Not Viable	
ES53	10		Not Viable	
SA5				
SES08	272		1607	Not Viable
SES09	218			Not Viable
SES10	151			Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SES11	151	760	Not Viable	
SES12	90		Not Viable	
SES13	75		Not Viable	
SES14	74		Not Viable	
SES15	50		Not Viable	
SES16	34		Not Viable	
SES17	31		Not Viable	
SES18	28		Not Viable	
SES19	27		Not Viable	
SES20	27		Not Viable	
SES21	26		Not Viable	
SES22	21		Not Viable	
SES23	20		Not Viable	
SES24	19		Not Viable	
SES25	14		Not Viable	
SES26	11		Not Viable	
SES27	10		Not Viable	
SES28	258		Not Viable	
SA6				
SS01	52			Viable range £0 - £20,000
SS02	45			Viable range £0 - £20,000
SS03	44			Viable range £0 - £20,000
SS04	37			Viable range £0 - £20,000
SS05	33			Viable range £0 - £20,000
SS06	30			Viable range £0 - £20,000
SS07	28			Viable range £0 - £20,000
SS08	26			Viable range £0 - £20,000
SS09	22			Viable range £0 - £20,000
SS10	17		Viable range £0 - £20,000	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
SS11	14		Viable range £0 - £20,000
SS12	14		Viable range £0 - £20,000
SS13	14		Viable range £0 - £20,000
SS14	12		Viable range £0 - £20,000
SS15	11		Viable range £0 - £20,000
SS16	10		Viable range £0 - £20,000
SS17	270		Viable range £0 - £20,000
SS18	81		Viable range £0 - £20,000
SA7		938	
SWS01	15		Viable range £0 - £20,000
SWS02	369		Viable range £0 - £20,000
SWS03	184		Viable range £0 - £20,000
SWS04	60		Viable range £0 - £20,000
SWS05	59		Viable range £0 - £20,000
SWS06	43		Viable range £0 - £20,000
SWS07	39		Viable range £0 - £20,000
SWS08	38		Viable range £0 - £20,000
SWS09	27		Viable range £0 - £20,000
SWS10	14		Viable range £0 - £20,000
SWS11	14		Viable range £0 - £20,000
SWS12	14		Viable range £0 - £20,000
SWS13	14		Viable range £0 - £20,000
SWS14	13		Viable range £0 - £20,000
SWS15	13		Viable range £0 - £20,000
SWS16	12		Viable range £0 - £20,000
SWS17	10	Viable range £0 - £20,000	
SA8		914	
SD02	428		Not Viable
SD03	190		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SD05	85		Not Viable	
SD06	55		Not Viable	
SD07	34		Not Viable	
SD08	33		Not Viable	
SD09	33		Not Viable	
SD10	18		Not Viable	
SD11	14		Not Viable	
SD12	14		Not Viable	
SD13	10		Not Viable	
SA9			24	
CH01	14			Not Viable
CH02	10			Not Viable
	27,229		27229	
Not viable	24,526			
Viable	2,703			

2.0 OBJECTION TO POLICY SA4: - SITE ALLOCATIONS IN EAST SHEFFIELD SUB-AREA

a) Site Reference: ES21 Address: Land between Prince of Wales Road and Station Road, S9 4JT 28 Homes

- 2.1 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.2 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.3 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.4 The council consider it necessary to have staged archaeological evaluation and/or building appraisal is required prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.5 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.6 Action: Delete Allocation.

b) Site Reference: ES22 Address: Attercliffe Canalside, land north of Worthing Road S9 3JN 595 Homes

- 2.7 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.8 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.9 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.10 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.11 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs this is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.12 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.13 Action: Delete Allocation

c) Site Reference: ES26 Address: Land at Algar Place S2 2NZ 121 Homes

- 2.14 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.15 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.16 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.17 Action: Delete Allocation.

d) Site Reference: ES27 Address: Land at Kenninghall Drive S2 3WR 120 Homes

- 2.18 This site is of a size and location which the Whole Plan Viability Assessment indicates would
- \\25.48.244.42\Job Files\GENERAL (G)\G5124PS Sheffield Local Plan Reg 19 Consultation\y PLANNING\2023 Regulation 19\Final Issue\02.17.MW.G5124PS.Regulation 19 Allocations SA4.docx

be unviable to develop.

- 2.19 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.20 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.21 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.22 Action: Delete Allocation.

e) Site Reference: ES28 Address: Fitzalan Works, Land to the south of Effingham Street S9 3QD 116 Homes

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- 2.23 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.24 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.25 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.26 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.27 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.28 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc could have a considerable impact on the scale of development.
- 2.29 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs this is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.30 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.31 Action: Delete Allocation.

f) Site Reference: ES31 Address: Staniforth Road Depot, Staniforth Road S9 3HD 93 Homes

- 2.32 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.33 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.34 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.35 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.36 Action: Delete Allocation.

g) Site Reference: ES33 Address: Westaways, Land at Bacon Lane S9 3HN 82 Homes

- 2.37 This site is of a size and location which the Whole Plan Viability Assessment indicates would

be unviable to develop.

- 2.38 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.39 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.40 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.41 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could have a considerable impact on the scale of development.
- 2.42 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.43 Action: Delete Allocation.

- h) Site Reference: ES34 Address St. John's School, Manor Oaks Road S2 5QZ 68 Homes**
- 2.44 This site is of a size and location which the Whole Plan Viability Assessment indicates would

be unviable to develop.

- 2.45 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.46 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.47 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.48 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.49 Action: Delete Allocation.

i) Site Reference: ES36 Address: Land at Daresbury Drive, S2 2BL 48 Homes

- 2.50 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.51 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.52 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.53 Action: Delete Allocation.

j) Site Reference: ES38 Address: Land at Prince of Wales Road, S9 4ET

- 2.54 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.55 The site is a Level 2 Strategic Flood Risk Assessment (SFRA) and is not deliverable until it passes an exception test.
- 2.56 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.57 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.58 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.59 Action: Delete Allocation.

k) Site Reference: ES39 Address: Buildings at Handsworth Road, S9 4AA 42 Homes

- 2.60 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.61 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.62 The requirement for open space increases costs and reduces the development area.
- 2.63 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.64 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.65 Action: Delete Allocation.

l) Site Reference: ES42 Address: Buildings at Blagden Street S2 5QS 37 Homes

- 2.66 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.67 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.68 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.69 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.70 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.71 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.72 Action: Delete Allocation.

m) Site Reference: ES46 Address: Land at Wulfric Road and Windy House Lane S2 1LB

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24 Homes

- 2.73 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.74 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.75 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.76 Action: Delete Allocation.

- n) **Site Reference: ES47 Address: Land to the north of Shortbridge Street S9 3SH 17 Homes**
- 2.77 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.78 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.79 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.80 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.81 Action: Delete Allocation.

o) Site Reference: ES50 Land adjacent former Foundry Workers Club and Institute Car Park, Beaumont Road North S2 1RS 16 Homes

- 2.82 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.83 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.84 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.85 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.86 Action: Delete Allocation.



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RTPI

Chartered Town Planner



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, Grace Clarkson, Stuart Garnett and Marcus Jolly
Organisation (if applicable): Hallam Land Management, Strata Homes, Inspired Villages and Lime Developments Limited
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: SA4

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.



Strategic Planning Research Unit
A specialist team within DLP Planning Ltd

For and on behalf of
**Hallam Land Management
Inspired Villages
Limes Developments Limited
Strata Homes (Yorkshire)**

**Sheffield Local Plan
Regulation 19 Consultation**

Objection to Policy SA5

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

February 2023



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

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1.0 OBJECTIONS TO ALLOCATIONS IN POLICY SA5 ON GROUNDS OF VIABILITY

- 1.1 The Whole Plan Viability Assessment identifies the proposed allocations in policies CA1 to CA6 and SA 3,4, 5, 8 AND 9 as being unviable.
- 1.2 The table on the next pages applies the viability results from the Whole Plan Viability Assessment to the allocations and this highlights that allocations within these policies are unviable.
- 1.3 While each site will of course have its own circumstances and for these allocations to be sound the council will need to demonstrate that they are capable of being delivered, if they are to be included in the five year land supply from the date of adoption or at least deliverable within the plan period.
- 1.4 At present the evidence available for all the sites allocated in Policy SA5 is that they are unviable and not deliverable and as such it would be unsound to include these sites within the plan.

Table 1. Viability assessment of proposed allocations from the Whole Plan Viability Assessment

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
CA1			
KN03	191	2743	Not Viable
KN04	200		Not Viable
KN05	132		Not Viable
KN06	114		Not Viable
KN07	98		Not Viable
KN08	96		Not Viable
KN09	96		Not Viable
KN10	90		Not Viable
KN11	87		Not Viable
KN12	86		Not Viable
KN13	93		Not Viable
KN14	75		Not Viable
KN15	50		Not Viable
KN16	62		Not Viable
KN17	61		Not Viable
KN18	60		Not Viable
KN19	60		Not Viable
KN20	54		Not Viable
KN21	33		Not Viable
KN22	50		Not Viable
KN23	50		Not Viable
KN24	60		Not Viable
KN25	45		Not Viable
KN26	44		Not Viable
KN27	28		Not Viable
KN28	35		Not Viable
KN29	23		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
KN30	30		Not Viable
KN31	18		Not Viable
KN32	15		Not Viable
KN33	13		Not Viable
KN34	12		Not Viable
KN35	10		Not Viable
KN36	572		Not Viable
CA2		1849	
CW03	368		Not Viable
CW04	75		Not Viable
CW05	56		Not Viable
CW06	19		Not Viable
CW07	5		Not Viable
CW08	3		Not Viable
CW09	336		Not Viable
CW10	268		Not Viable
CW11	206		Not Viable
CW12	94		Not Viable
CW13	83		Not Viable
CW14	65		Not Viable
CW15	46		Not Viable
CW16	43		Not Viable
CW17	77		Not Viable
CW18	28		Not Viable
CW19	16		Not Viable
CW20	16		Not Viable
CW21	16		Not Viable
CW22	15		Not Viable
CW23	14		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
CA3			
SU02	32		Not Viable
SU03	500		Not Viable
SU04	355		Not Viable
SU05	116		Not Viable
SU06	100		Not Viable
SU07	284		Not Viable
SU08	225		Not Viable
SU09	229		Not Viable
SU10	34		Not Viable
SU11	118		Not Viable
SU12	216		Not Viable
SU13	120		Not Viable
SU14	118		Not Viable
SU15	27	3998	Not Viable
SU16	93		Not Viable
SU17	88		Not Viable
SU18	85		Not Viable
SU19	84		Not Viable
SU20	61		Not Viable
SU21	58		Not Viable
SU22	58		Not Viable
SU23	56		Not Viable
SU24	48		Not Viable
SU25	48		Not Viable
SU26	45		Not Viable
SU27	23		Not Viable
SU28	43		Not Viable
SU29	47		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SU30	22	2101	Not Viable	
SU31	39		Not Viable	
SU32	39		Not Viable	
SU33	38		Not Viable	
SU34	77		Not Viable	
SU35	20		Not Viable	
SU36	20		Not Viable	
SU37	61		Not Viable	
SU38	29		Not Viable	
SU39	46		Not Viable	
SU40	26		Not Viable	
SU41	25		Not Viable	
SU42	57		Not Viable	
SU43	17		Not Viable	
SU44	22		Not Viable	
SU45	21		Not Viable	
SU46	21		Not Viable	
SU47	10		Not Viable	
SU48	20		Not Viable	
SU49	18		Not Viable	
SU50	18		Not Viable	
SU51	17		Not Viable	
SU52	13		Not Viable	
SU53	11		Not Viable	
CA4				
SV04	303		2101	Not Viable
SV05	42		2101	Not Viable
SV06	335		2101	Not Viable
SV07	149		2101	Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SV08	121		Not Viable	
SV09	117		Not Viable	
SV10	108		Not Viable	
SV11	102		Not Viable	
SV12	100		Not Viable	
SV13	96		Not Viable	
SV14	95		Not Viable	
SV15	89		Not Viable	
SV16	85		Not Viable	
SV17	75		Not Viable	
SV18	66		Not Viable	
SV19	58		Not Viable	
SV20	42		Not Viable	
SV21	40		Not Viable	
SV22	30		Not Viable	
SV23	22		Not Viable	
SV24	16		Not Viable	
SV25	10		Not Viable	
CA5			6095	
HC03	1006			Not Viable
HC04	100			Not Viable
HC05	52			Not Viable
HC06	9			Not Viable
HC07	1230			Not Viable
HC08	714			Not Viable
HC09	410	Not Viable		
HC10	364	Not Viable		
HC11	364	Not Viable		
HC12	298	Not Viable		

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
HC13	213		Not Viable	
HC14	162		Not Viable	
HC15	136		Not Viable	
HC16	135		Not Viable	
HC17	135		Not Viable	
HC18	101		Not Viable	
HC19	97		Not Viable	
HC20	95		Not Viable	
HC21	93		Not Viable	
HC22	92		Not Viable	
HC23	77		Not Viable	
HC24	46		Not Viable	
HC25	45		Not Viable	
HC26	45		Not Viable	
HC27	30		Not Viable	
HC28	22		Not Viable	
HC29	12		Not Viable	
HC30	12		Not Viable	
CA6				
LR01	466		1495	Not Viable
LR02	367			Not Viable
LR03	336			Not Viable
LR04	111			Not Viable
LR05	84			Not Viable
LR06	61			Not Viable
LR07	56			Not Viable
LR08	14			Not Viable
SA2				1005
NWS08	13			Viable range £0 - £20,000

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
NWS09	311	801	Viable range £0 - £20,000	
NWS10	169		Viable range £0 - £20,000	
NWS11	77		Viable range £0 - £20,000	
NWS12	76		Viable range £0 - £20,000	
NWS13	63		Viable range £0 - £20,000	
NWS14	48		Viable range £0 - £20,000	
NWS15	41		Viable range £0 - £20,000	
NWS16	32		Viable range £0 - £20,000	
NWS17	23		Viable range £0 - £20,000	
NWS18	22		Viable range £0 - £20,000	
NWS19	19		Viable range £0 - £20,000	
NWS20	14		Viable range £0 - £20,000	
NWS21	14		Viable range £0 - £20,000	
NWS22	14		Viable range £0 - £20,000	
NWS23	13		Viable range £0 - £20,000	
NWS24	13		Viable range £0 - £20,000	
NWS25	12		Viable range £0 - £20,000	
NWS26	11		Viable range £0 - £20,000	
NWS27	10		Viable range £0 - £20,000	
NWS28	10		Viable range £0 - £20,000	
SA3				
NES09	53			Not Viable
NES10	32			Not Viable
NES11	88			Not Viable
NES12	73			Not Viable
NES13	68			Not Viable
NES14	44			Not Viable
NES15	33			Not Viable
NES16	32		Not Viable	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
NES17	29		Not Viable
NES18	24		Not Viable
NES19	24		Not Viable
NES20	24		Not Viable
NES21	23		Not Viable
NES22	21		Not Viable
NES23	20		Not Viable
NES24	20		Not Viable
NES25	20		Not Viable
NES26	20		Not Viable
NES27	19		Not Viable
NES28	19		Not Viable
NES29	19		Not Viable
NES30	19		Not Viable
NES31	18		Not Viable
NES32	17		Not Viable
NES33	16		Not Viable
NES34	14		Not Viable
NES35	12		Not Viable
SA4			2899
ES20	80	Not Viable	
ES21	28	Not Viable	
ES22	596	Not Viable	
ES23	371	Not Viable	
ES24	210	Not Viable	
ES25	147	Not Viable	
ES26	121	Not Viable	
ES27	120	Not Viable	
ES28	116	Not Viable	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
ES29	101		Not Viable	
ES30	98		Not Viable	
ES31	93		Not Viable	
ES32	93		Not Viable	
ES33	82		Not Viable	
ES34	68		Not Viable	
ES35	63		Not Viable	
ES36	48		Not Viable	
ES37	47		Not Viable	
ES38	46		Not Viable	
ES39	42		Not Viable	
ES40	41		Not Viable	
ES41	39		Not Viable	
ES42	37		Not Viable	
ES43	35		Not Viable	
ES44	28		Not Viable	
ES45	26		Not Viable	
ES46	24		Not Viable	
ES47	17		Not Viable	
ES48	17		Not Viable	
ES49	16		Not Viable	
ES50	16		Not Viable	
ES51	12		Not Viable	
ES52	11		Not Viable	
ES53	10		Not Viable	
SA5				
SES08	272		1607	Not Viable
SES09	218			Not Viable
SES10	151			Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SES11	151	760	Not Viable	
SES12	90		Not Viable	
SES13	75		Not Viable	
SES14	74		Not Viable	
SES15	50		Not Viable	
SES16	34		Not Viable	
SES17	31		Not Viable	
SES18	28		Not Viable	
SES19	27		Not Viable	
SES20	27		Not Viable	
SES21	26		Not Viable	
SES22	21		Not Viable	
SES23	20		Not Viable	
SES24	19		Not Viable	
SES25	14		Not Viable	
SES26	11		Not Viable	
SES27	10		Not Viable	
SES28	258		Not Viable	
SA6				
SS01	52			Viable range £0 - £20,000
SS02	45			Viable range £0 - £20,000
SS03	44			Viable range £0 - £20,000
SS04	37			Viable range £0 - £20,000
SS05	33		760	Viable range £0 - £20,000
SS06	30			Viable range £0 - £20,000
SS07	28			Viable range £0 - £20,000
SS08	26			Viable range £0 - £20,000
SS09	22			Viable range £0 - £20,000
SS10	17		Viable range £0 - £20,000	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
SS11	14		Viable range £0 - £20,000
SS12	14		Viable range £0 - £20,000
SS13	14		Viable range £0 - £20,000
SS14	12		Viable range £0 - £20,000
SS15	11		Viable range £0 - £20,000
SS16	10		Viable range £0 - £20,000
SS17	270		Viable range £0 - £20,000
SS18	81		Viable range £0 - £20,000
SA7		938	
SWS01	15		Viable range £0 - £20,000
SWS02	369		Viable range £0 - £20,000
SWS03	184		Viable range £0 - £20,000
SWS04	60		Viable range £0 - £20,000
SWS05	59		Viable range £0 - £20,000
SWS06	43		Viable range £0 - £20,000
SWS07	39		Viable range £0 - £20,000
SWS08	38		Viable range £0 - £20,000
SWS09	27		Viable range £0 - £20,000
SWS10	14		Viable range £0 - £20,000
SWS11	14		Viable range £0 - £20,000
SWS12	14		Viable range £0 - £20,000
SWS13	14		Viable range £0 - £20,000
SWS14	13		Viable range £0 - £20,000
SWS15	13		Viable range £0 - £20,000
SWS16	12		Viable range £0 - £20,000
SWS17	10	Viable range £0 - £20,000	
SA8		914	
SD02	428		Not Viable
SD03	190		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SD05	85		Not Viable	
SD06	55		Not Viable	
SD07	34		Not Viable	
SD08	33		Not Viable	
SD09	33		Not Viable	
SD10	18		Not Viable	
SD11	14		Not Viable	
SD12	14		Not Viable	
SD13	10		Not Viable	
SA9			24	
CH01	14			Not Viable
CH02	10			Not Viable
	27,229		27229	
Not viable	24,526			
Viable	2,703			

2.0 OBJECTION TO POLICY SA5: - SITE ALLOCATIONS IN SOUTHEAST SHEFFIELD SUB-AREA

a) Site Reference: SES08 Address: Land at Silkstone Road, Wickfield Road and Dyke Vale Road S12 4TU - 272 Homes

- 2.1 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.2 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.3 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.4 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.5 Action: Delete Allocation.

- b) Site Reference: SES10 Address: Land to the east of Moor Valley Road S20 5DZ – 151 Homes**
- 2.6 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.7 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.8 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.9 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.10 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs this is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.11 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.12 Action: Delete Allocation.

c) Site Reference: SES11 Address: Manor Top

- 2.13 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.14 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.15 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.16 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.17 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.18 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs this is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.19 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.20 Action: Delete Allocation.

d) Site Reference: SES12 Address: Land at Vinkinglea Drive S2 1FD – 90 Homes

- 2.21 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.22 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.23 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.24 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.25 Action: Delete Allocation.

e) Site Reference: SES13 Address: Land to the east of Jaunty Avenue S12 3DQ – 75 Homes

- 2.26 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.27 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.28 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.29 Action: Delete Allocation.

f) Site Reference: SES15 Address: Former Prince Edward Primary School and land adjacent Queen Mary Road S2 1EE – 50 Homes

- 2.30 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.31 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.32 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.33 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.34 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.35 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.36 Action: Delete Allocation.

g) Site Reference: SES16 Address: Manor Community Centre, Fairfax Road S2 1BQ – 34 Homes

- 2.37 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.38 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.39 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.40 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.41 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.42 Action: Delete Allocation.

h) Site Reference: SES17 Address: Former Joseph Glover Public House, Land at Station Road and Westfield Southway S20 8JB – 31 Homes

- 2.43 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.44 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.45 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.46 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.47 Action: Delete Allocation.

i) Site Reference: SES19 Address: Land at Waverley Lane and Halesworth Road, S13 9AF – 27 Homes

- 2.48 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.49 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.50 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.51 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.52 Action: Delete Allocation.

- j) Site Reference: SES21 Address: Curtilage of Basforth House, 471 Stradbroke Road, Sheffield S13 7GE – 26 Homes**
- 2.53 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.54 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.55 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could have a considerable impact on the scale of development.
- 2.56 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 2.57 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.58 Action: Delete Allocation.

k) Site Reference: SES22 Address: Land at Smelter Wood Road S13 8RY – 21 Homes

- 2.59 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.60 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.61 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.62 Action: Delete Allocation.

I) Site Reference: SES23 Address: Land to the north of Junction Road S13 7RQ – 20 Homes

- 2.63 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.64 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.65 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.66 Action: Delete Allocation.

m) Site Reference: SES24 Address: Former Foxwood, Land at Ridgeway Road S12 2TW – 19 Homes

- 2.67 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.68 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.69 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.70 Action: Delete Allocation.

n) Site Reference: SES28 Address: Woodhouse East, Land to the north of Beighton Road S13 7SA – 258 Homes

- 2.71 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.72 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.73 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.74 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.75 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.76 Action: Delete Allocation.



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Chartered Town Planner



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, Grace Clarkson, Stuart Garnett and Marcus Jolly
Organisation (if applicable): Hallam Land Management, Strata Homes, Inspired Villages and Lime Developments Limited
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: SA5

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.



Strategic Planning Research Unit
A specialist team within DLP Planning Ltd

For and on behalf of
**Hallam Land Management
Inspired Villages
Limes Developments Limited
Strata Homes (Yorkshire)**

**Sheffield Local Plan
Regulation 19 Consultation**

Objection to Policy SA6

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

February 2023



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

Strategic Planning Research Unit

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Bedford
MK44 3WH

Tel: [REDACTED]

Tel: [REDACTED]

Tel: [REDACTED]

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1.0 OBJECTION TO POLICY SA6: SITE ALLOCATIONS IN SOUTH SHEFFIELD SUB-AREA

a) Site Reference: SS04 Address: Former Hazlebarrow School, Land at Hazelbarrow Close S8 8AQ 37 Homes

- 1.1 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 1.2 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 1.3 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 1.4 Action: Delete Allocation.

b) Site Reference: SS09 Address: Scarsdale House, 136 Derbyshire Lane, Woodseats 22 Homes

- 1.5 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 1.6 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 1.7 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 1.8 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 1.9 Action: Delete Allocation.

c) Site Reference: SS13 Address: The Ball Inn, Myrtle Road S2 3HR 14 Homes

- 1.10 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 1.11 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 1.12 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 1.13 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could have a considerable impact on the scale of development.
- 1.14 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable. For this scale and type of development.
- 1.15 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 1.16 Action: Delete Allocation.

- d) Site Reference: SS17 Address: Former Norton Aerodrome, Norton Avenue S17 3DQ
270 Homes**
- 1.17 The extent of land contamination is unknown as is the nature and costs of any mitigation and / or remediation.
- 1.18 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 1.19 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 1.20 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could have a considerable impact on the scale of development.
- 1.21 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs this is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable. For this scale and type of development.
- 1.22 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 1.23 Action: Delete Allocation.



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sheffield@dlpconsultants.co.uk



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Chartered Town Planner



Sheffield Plan Consultation Representation Form January – February 2023

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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, Grace Clarkson, Stuart Garnett and Marcus Jolly
Organisation (if applicable): Hallam Land Management, Strata Homes, Inspired Villages and Lime Developments Limited
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: SA6

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

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

Yes

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

No

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Strategic Planning Research Unit
A specialist team within DLP Planning Ltd

For and on behalf of
**Hallam Land Management
Inspired Villages
Limes Developments Limited
Strata Homes (Yorkshire)**

**Sheffield Local Plan
Regulation 19 Consultation**

Objection to Policy SA7

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

February 2023



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

Strategic Planning Research Unit

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1.0 OBJECTION TO POLICY SA7: SITE ALLOCATIONS IN SOUTHWEST SHEFFIELD SUB-AREA

a) Site Reference: SWS01 Address: Land Adjacent to 112 London Road, S2 4LR: 15 Homes

- 1.1 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 1.2 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 1.3 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 1.4 Action: Delete Allocation.

- b) Site Reference: SWS06 Address: Howdens Joinery Co, Bramall Lane S2 4RD 43 Homes**
- 1.5 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 1.6 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 1.7 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 1.8 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 1.9 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 1.10 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable for this scale and type of development.
- 1.11 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 1.12 Action: Delete Allocation.

c) Site Reference: SWS10 Address: Springvale Gospel Hall, Land to the south of Carter Knowle Road S7 2ED 14 Homes

- 1.13 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 1.14 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 1.15 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 1.16 Action: Delete Allocation.

- d) Site Reference: SWS17 Address: Land at Banner Cross Hall, Ecclesall Road, South S11 9PD 10 Homes**
- 1.17 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 1.18 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 1.19 This site is identified as impacting on a Heritage Asset which may well impact on the cost of development in terms of the nature of materials etc which could in turn have a considerable impact on the scale of development.
- 1.20 The implication of the above both in terms of potential land take or sterilisation could limit the level of housing to be achieved on site or depending on the nature of any mitigation required prevent the site from being developed at all due to costs. This is especially the case in this location which the Whole Plan Viability Assessment has already identified as being unviable. For this scale and type of development.
- 1.21 The combination of the conversion of this listed building and ecological constraints will require the council to work with the developer to ensure delivery and an acknowledgement that the full level of affordable housing might not be deliverable on this site.
- 1.22 Action:
- 1.23 The policy should recognise the constraints on the site and note that affordable housing might not be delivered on this allocation.



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Chartered Town Planner



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, Grace Clarkson, Stuart Garnett and Marcus Jolly
Organisation (if applicable): Hallam Land Management, Strata Homes, Inspired Villages and Lime Developments Limited
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: SA7

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.



Strategic Planning Research Unit
A specialist team within DLP Planning Ltd

For and on behalf of
**Hallam Land Management
Inspired Villages
Limes Developments Limited
Strata Homes (Yorkshire)**

**Sheffield Local Plan
Regulation 19 Consultation**

Objection to Policy SA8

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

February 2023



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

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1.0 OBJECTIONS TO ALLOCATIONS IN POLICY SA8 ON GROUNDS OF VIABILITY

- 1.1 The Whole Plan Viability Assessment identifies the proposed allocations in policies CA1 to CA6 and SA 3,4, 5, 8 AND 9 as being unviable.
- 1.2 The table on the next pages applies the viability results from the Whole Plan Viability Assessment to the allocations and this highlights that allocations within these policies are unviable.
- 1.3 While each site will of course have its own circumstances and for these allocations to be sound the council will need to demonstrate that they are capable of being delivered, if they are to be included in the five year land supply from the date of adoption or at least deliverable within the plan period.
- 1.4 At present the evidence available for all the sites allocated in Policy SA8 is that they are unviable and not deliverable and as such it would be unsound to include these sites within the plan.

Table 1. Viability assessment of proposed allocations from the Whole Plan Viability Assessment

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
CA1			
KN03	191	2743	Not Viable
KN04	200		Not Viable
KN05	132		Not Viable
KN06	114		Not Viable
KN07	98		Not Viable
KN08	96		Not Viable
KN09	96		Not Viable
KN10	90		Not Viable
KN11	87		Not Viable
KN12	86		Not Viable
KN13	93		Not Viable
KN14	75		Not Viable
KN15	50		Not Viable
KN16	62		Not Viable
KN17	61		Not Viable
KN18	60		Not Viable
KN19	60		Not Viable
KN20	54		Not Viable
KN21	33		Not Viable
KN22	50		Not Viable
KN23	50		Not Viable
KN24	60		Not Viable
KN25	45		Not Viable
KN26	44		Not Viable
KN27	28		Not Viable
KN28	35		Not Viable
KN29	23		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
KN30	30		Not Viable
KN31	18		Not Viable
KN32	15		Not Viable
KN33	13		Not Viable
KN34	12		Not Viable
KN35	10		Not Viable
KN36	572		Not Viable
CA2		1849	
CW03	368		Not Viable
CW04	75		Not Viable
CW05	56		Not Viable
CW06	19		Not Viable
CW07	5		Not Viable
CW08	3		Not Viable
CW09	336		Not Viable
CW10	268		Not Viable
CW11	206		Not Viable
CW12	94		Not Viable
CW13	83		Not Viable
CW14	65		Not Viable
CW15	46		Not Viable
CW16	43		Not Viable
CW17	77		Not Viable
CW18	28		Not Viable
CW19	16		Not Viable
CW20	16		Not Viable
CW21	16		Not Viable
CW22	15		Not Viable
CW23	14		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
CA3			
SU02	32		Not Viable
SU03	500		Not Viable
SU04	355		Not Viable
SU05	116		Not Viable
SU06	100		Not Viable
SU07	284		Not Viable
SU08	225		Not Viable
SU09	229		Not Viable
SU10	34		Not Viable
SU11	118		Not Viable
SU12	216		Not Viable
SU13	120		Not Viable
SU14	118		Not Viable
SU15	27	3998	Not Viable
SU16	93		Not Viable
SU17	88		Not Viable
SU18	85		Not Viable
SU19	84		Not Viable
SU20	61		Not Viable
SU21	58		Not Viable
SU22	58		Not Viable
SU23	56		Not Viable
SU24	48		Not Viable
SU25	48		Not Viable
SU26	45		Not Viable
SU27	23		Not Viable
SU28	43		Not Viable
SU29	47		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SU30	22	2101	Not Viable	
SU31	39		Not Viable	
SU32	39		Not Viable	
SU33	38		Not Viable	
SU34	77		Not Viable	
SU35	20		Not Viable	
SU36	20		Not Viable	
SU37	61		Not Viable	
SU38	29		Not Viable	
SU39	46		Not Viable	
SU40	26		Not Viable	
SU41	25		Not Viable	
SU42	57		Not Viable	
SU43	17		Not Viable	
SU44	22		Not Viable	
SU45	21		Not Viable	
SU46	21		Not Viable	
SU47	10		Not Viable	
SU48	20		Not Viable	
SU49	18		Not Viable	
SU50	18		Not Viable	
SU51	17		Not Viable	
SU52	13		Not Viable	
SU53	11		Not Viable	
CA4				
SV04	303			Not Viable
SV05	42			Not Viable
SV06	335			Not Viable
SV07	149			Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SV08	121	6095	Not Viable	
SV09	117		Not Viable	
SV10	108		Not Viable	
SV11	102		Not Viable	
SV12	100		Not Viable	
SV13	96		Not Viable	
SV14	95		Not Viable	
SV15	89		Not Viable	
SV16	85		Not Viable	
SV17	75		Not Viable	
SV18	66		Not Viable	
SV19	58		Not Viable	
SV20	42		Not Viable	
SV21	40		Not Viable	
SV22	30		Not Viable	
SV23	22		Not Viable	
SV24	16		Not Viable	
SV25	10		Not Viable	
CA5				
HC03	1006			Not Viable
HC04	100			Not Viable
HC05	52			Not Viable
HC06	9			Not Viable
HC07	1230			Not Viable
HC08	714			Not Viable
HC09	410		Not Viable	
HC10	364		Not Viable	
HC11	364		Not Viable	
HC12	298		Not Viable	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
HC13	213		Not Viable	
HC14	162		Not Viable	
HC15	136		Not Viable	
HC16	135		Not Viable	
HC17	135		Not Viable	
HC18	101		Not Viable	
HC19	97		Not Viable	
HC20	95		Not Viable	
HC21	93		Not Viable	
HC22	92		Not Viable	
HC23	77		Not Viable	
HC24	46		Not Viable	
HC25	45		Not Viable	
HC26	45		Not Viable	
HC27	30		Not Viable	
HC28	22		Not Viable	
HC29	12		Not Viable	
HC30	12		Not Viable	
CA6				
LR01	466		1495	Not Viable
LR02	367			Not Viable
LR03	336			Not Viable
LR04	111			Not Viable
LR05	84			Not Viable
LR06	61			Not Viable
LR07	56			Not Viable
LR08	14			Not Viable
SA2				1005
NWS08	13			Viable range £0 - £20,000

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
NWS09	311	801	Viable range £0 - £20,000	
NWS10	169		Viable range £0 - £20,000	
NWS11	77		Viable range £0 - £20,000	
NWS12	76		Viable range £0 - £20,000	
NWS13	63		Viable range £0 - £20,000	
NWS14	48		Viable range £0 - £20,000	
NWS15	41		Viable range £0 - £20,000	
NWS16	32		Viable range £0 - £20,000	
NWS17	23		Viable range £0 - £20,000	
NWS18	22		Viable range £0 - £20,000	
NWS19	19		Viable range £0 - £20,000	
NWS20	14		Viable range £0 - £20,000	
NWS21	14		Viable range £0 - £20,000	
NWS22	14		Viable range £0 - £20,000	
NWS23	13		Viable range £0 - £20,000	
NWS24	13		Viable range £0 - £20,000	
NWS25	12		Viable range £0 - £20,000	
NWS26	11		Viable range £0 - £20,000	
NWS27	10		Viable range £0 - £20,000	
NWS28	10		Viable range £0 - £20,000	
SA3				
NES09	53			Not Viable
NES10	32			Not Viable
NES11	88			Not Viable
NES12	73			Not Viable
NES13	68			Not Viable
NES14	44			Not Viable
NES15	33			Not Viable
NES16	32		Not Viable	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
NES17	29		Not Viable
NES18	24		Not Viable
NES19	24		Not Viable
NES20	24		Not Viable
NES21	23		Not Viable
NES22	21		Not Viable
NES23	20		Not Viable
NES24	20		Not Viable
NES25	20		Not Viable
NES26	20		Not Viable
NES27	19		Not Viable
NES28	19		Not Viable
NES29	19		Not Viable
NES30	19		Not Viable
NES31	18		Not Viable
NES32	17		Not Viable
NES33	16		Not Viable
NES34	14		Not Viable
NES35	12		Not Viable
SA4			2899
ES20	80	Not Viable	
ES21	28	Not Viable	
ES22	596	Not Viable	
ES23	371	Not Viable	
ES24	210	Not Viable	
ES25	147	Not Viable	
ES26	121	Not Viable	
ES27	120	Not Viable	
ES28	116	Not Viable	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
ES29	101		Not Viable	
ES30	98		Not Viable	
ES31	93		Not Viable	
ES32	93		Not Viable	
ES33	82		Not Viable	
ES34	68		Not Viable	
ES35	63		Not Viable	
ES36	48		Not Viable	
ES37	47		Not Viable	
ES38	46		Not Viable	
ES39	42		Not Viable	
ES40	41		Not Viable	
ES41	39		Not Viable	
ES42	37		Not Viable	
ES43	35		Not Viable	
ES44	28		Not Viable	
ES45	26		Not Viable	
ES46	24		Not Viable	
ES47	17		Not Viable	
ES48	17		Not Viable	
ES49	16		Not Viable	
ES50	16		Not Viable	
ES51	12		Not Viable	
ES52	11		Not Viable	
ES53	10		Not Viable	
SA5				
SES08	272		1607	Not Viable
SES09	218			Not Viable
SES10	151			Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SES11	151	760	Not Viable	
SES12	90		Not Viable	
SES13	75		Not Viable	
SES14	74		Not Viable	
SES15	50		Not Viable	
SES16	34		Not Viable	
SES17	31		Not Viable	
SES18	28		Not Viable	
SES19	27		Not Viable	
SES20	27		Not Viable	
SES21	26		Not Viable	
SES22	21		Not Viable	
SES23	20		Not Viable	
SES24	19		Not Viable	
SES25	14		Not Viable	
SES26	11		Not Viable	
SES27	10		Not Viable	
SES28	258		Not Viable	
SA6				
SS01	52			Viable range £0 - £20,000
SS02	45			Viable range £0 - £20,000
SS03	44			Viable range £0 - £20,000
SS04	37			Viable range £0 - £20,000
SS05	33		760	Viable range £0 - £20,000
SS06	30			Viable range £0 - £20,000
SS07	28			Viable range £0 - £20,000
SS08	26			Viable range £0 - £20,000
SS09	22			Viable range £0 - £20,000
SS10	17		Viable range £0 - £20,000	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario
SS11	14		Viable range £0 - £20,000
SS12	14		Viable range £0 - £20,000
SS13	14		Viable range £0 - £20,000
SS14	12		Viable range £0 - £20,000
SS15	11		Viable range £0 - £20,000
SS16	10		Viable range £0 - £20,000
SS17	270		Viable range £0 - £20,000
SS18	81		Viable range £0 - £20,000
SA7		938	
SWS01	15		Viable range £0 - £20,000
SWS02	369		Viable range £0 - £20,000
SWS03	184		Viable range £0 - £20,000
SWS04	60		Viable range £0 - £20,000
SWS05	59		Viable range £0 - £20,000
SWS06	43		Viable range £0 - £20,000
SWS07	39		Viable range £0 - £20,000
SWS08	38		Viable range £0 - £20,000
SWS09	27		Viable range £0 - £20,000
SWS10	14		Viable range £0 - £20,000
SWS11	14		Viable range £0 - £20,000
SWS12	14		Viable range £0 - £20,000
SWS13	14		Viable range £0 - £20,000
SWS14	13		Viable range £0 - £20,000
SWS15	13		Viable range £0 - £20,000
SWS16	12		Viable range £0 - £20,000
SWS17	10	Viable range £0 - £20,000	
SA8		914	
SD02	428		Not Viable
SD03	190		Not Viable

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	
SD05	85		Not Viable	
SD06	55		Not Viable	
SD07	34		Not Viable	
SD08	33		Not Viable	
SD09	33		Not Viable	
SD10	18		Not Viable	
SD11	14		Not Viable	
SD12	14		Not Viable	
SD13	10		Not Viable	
SA9			24	
CH01	14			Not Viable
CH02	10			Not Viable
	27,229		27229	
Not viable	24,526			
Viable	2,703			

2.0 OBJECTION TO POLICY SA8: - SITE ALLOCATIONS IN STOCKSBRIDGE/DEEPCAR SUB-AREA

a) Site Reference: SD03 Address: Site A, Stocksbridge Steelworks, Manchester Road S36 1FT – 190 Homes

- 2.1 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.2 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.3 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.4 The council consider it necessary to have staged archaeological evaluation and/or building appraisal undertaken prior to the submission of any planning application. This clearly has the potential to prevent any development or indeed severely restrict development. If such work is required pre application, it should really be undertaken prior to the site being allocated.
- 2.5 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.6 Action: Delete Allocation.

b) Site Reference: SD07 Address: Site G, Stocksbridge Steelworks, Fox Valley Way S36 2BT – 34 Homes

- 2.7 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.8 The impact of nearby Environment Agency waste permit sites is unknown, and this could limit the level of housing to be achieved or depending on the nature of any mitigation required prevent the site from being developed at all due to costs of mitigation especially when combined with other as yet unknown costs.
- 2.9 The extent of land contamination is unknown as is the nature and costs of any mitigation and/or remediation.
- 2.10 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.11 Action: Delete Allocation.

- c) Site Reference: SD08 Address: Balfour House, Coronation Road S36 1LQ – 33 Homes**
- 2.12 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.13 The site is a Level 2 Strategic Flood Risk Assessment (SFRA) and is not deliverable until it passes an exception test.
- 2.14 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.15 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.16 Action: Delete Allocation.

d) Site Reference: SD08 Address: Sweeney House, Oxley Close S36 1LG – 18 Homes

- 2.17 This site is of a size and location which the Whole Plan Viability Assessment indicates would be unviable to develop.
- 2.18 Biodiversity Net Gain is required to be delivered on site within the connective ecological corridor/area. On site delivery will reduce the land available for development which may adversely impact on the viability of the scheme.
- 2.19 The unknown impact of the above constraints mean that the site cannot be considered deliverable and as such is not a sound allocation at the present time on the evidence available.
- 2.20 Action: Delete Allocation.



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Chartered Town Planner



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:

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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>

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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, Grace Clarkson, Stuart Garnett and Marcus Jolly
Organisation (if applicable): Hallam Land Management, Strata Homes, Inspired Villages and Lime Developments Limited
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: SA8

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.

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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.

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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
Inspired Villages
Limes Developments Limited
Strata Homes (Yorkshire)**

**Sheffield Local Plan
Regulation 19 Consultation**

**Objections to the Local Plan
Policy H1: Scale and Supply of new Housing**

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

February 2023



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

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1.0 OBJECTION TO POLICY H1: SCALE AND SUPPLY OF NEW HOUSING

a) Objection to policy H1 a) focus of development on previously developed land

1.1 Our objection to the focusing all delivery on previously developed land is the same as our objection to the strategy in SP2 which proposed to deliver housing below minimum level set by the Standard Method. The focusing of all housing into existing urban areas and primarily former industrial areas in the city centre sub area and both is unsound for similar reasons as set out in our SP2 objections. These are, in brief (see our objection to SP2 for Full explanation):

- a) The Whole Plan Viability Assessment identifies that most of the proposed allocations on previously developed land as being unviable.
- b) The Whole Plan Viability Assessment defines just 2,703 dwellings out of the total allocated of 27,229 as being viable. This approach therefore is unsound as the evidence available for these sites is that they are unviable and not deliverable and as such would be unsound to include in the plan.
- c) The viability issues identified in the Whole Plan Viability Assessment highlight that the concentration of development on previously developed site to the extent that is proposed means that less just 808 affordable units will be delivered over the whole plan period. This is an average of 48 dpa.
- d) This falls significantly short of the need in the SMHA of 902 dpa.
- e) In addition, the concentration of development on previously developed sites over concentrates development in a single location which results in an under delivery of family homes affordable homes and specialist older persons accommodation. However not all previously developed land is allocated, for while Norton Aerodrome has been allocated other well located and sustainable sites like Dore More Nursey (see separate objection from Inspired Villages) have been omitted.
- f) The policy suggests that it will deliver a sustainable pattern of development, but this is incorrect as it fails to meet the needs of particular groups (families and older persons) and does not meet the needs of those sub areas outside of the city centre.
- g) The site selection process was unsound and there are sustainable green field sites adjacent to the existing settlements boundaries that can deliver the type and tenure of housing (including affordable, family, and older persons housing) to meet the City's needs in full (see Objections from Hallam Land, Strata, and Limes Development for examples).

1.2 **ACTION:**
Change first sentence of H1 as follows:

1.3 a) Delivery of new homes will be in accordance with Policy SP1 and Policy SP2. It will be **primarily** focused on previously developed land within or **adjoining** the existing urban areas **and a selection of sustainable green field sites adjacent to** –these are the Main Urban Area of Sheffield, and the two Principal Towns of Chapeltown/High Green and Stocksbridge/Deepcar.

b) Objection to H1 d) windfalls and broad areas of growth

1.4 The strategic policies do not provide a clear strategy for bringing sufficient land forward, at a sufficient rate, to address the minimum level of housing needs over the plan period.

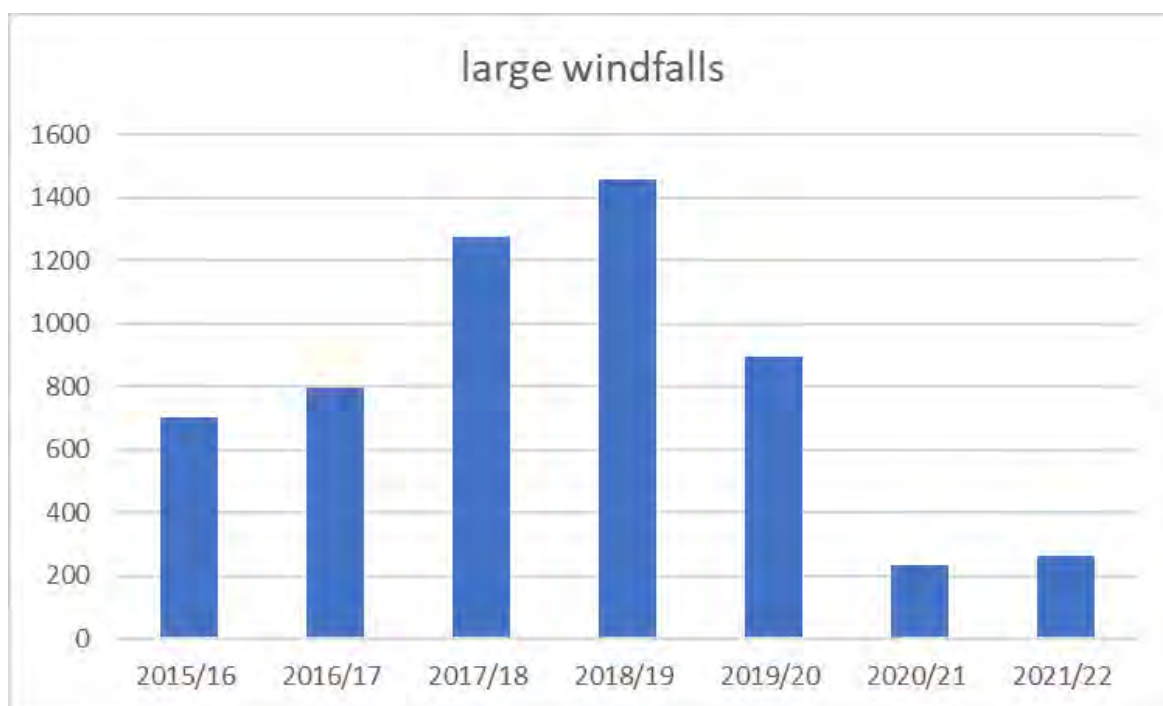
1.5 Board areas of growth are not identified on the Proposals map and reliance on this, and the assumed housing delivery associated with these locations are unsound and both should be deleted from the plan policies.

1.6 The broad areas of growth for development are not indicated on a key diagram and reference

to such locations is not in accordance with paragraph 22 of the NPPF.

- 1.7 NPPF paragraph 23 requires that strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or nonstrategic policies).
- 1.8 In addition, NPPF paragraph 23 requires should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:
 - a) specific, deliverable sites for years one to five of the plan period; and
 - b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan
- 1.9 The IIA demonstrates that it is possible to identify specific sites to meet the minimum housing requirement as set by the Standard Method. As highlighted by our objection to the IIA the approach taken does not allow for the contribution that could be made from smaller non-strategic sites released from the Green Belt which could increase further the selection of sustainable and deliverable sites.
- 1.10 These unidentified broad areas of growth have not been subject to the sustainability assessment (IIA does not refer to them).
- 1.11 While the HELAA refers to broad areas of growth there is no indication as to their location or the level of likely completions.
- 1.12 Table 19 of the HELAA “Summary of Overall Local Plan Housing Land Supply 2022/23 to 2038/39” does not seek to identify the broad areas of growth but instead uses the same number (4,675 units) but describes these as being “Large Site windfall”.
- 1.13 The HELAA (paragraph 3.60) explains that the Local Plan proposes an allowance of 4675 windfalls on large sites over the Plan period (2022-39) and describes this as a conservative estimate of 275 dpa on large windfalls each year based on analysis from table 9. The results from table 9 are shown in the chart below this illustrates that the level of contribution from large windfalls is highly flexible.
- 1.14 As the HELAA accepts the last plan to make allocations in Sheffield was 1998. Therefore, while this analysis uses sites that were not identified by the HELAA it has to be recognised that the process of producing a HELAA is significantly different from the much more in depth and detailed site search and site investigation that go into the drafting of a Local Plan and as such these levels of completions are considered to represent a significant over estimate of the level of completions that will come forward.
- 1.15 In addition these completions appear to include the completions of accommodation that is for student occupation and as highlighted by the report “Purpose-Built Student Accommodation Market Study Sheffield City Council December 2021” student to bed ratio in the City has now fallen to an unhealthy level which is impacting occupancy and arguably the long-term sustainability of some developments and that too many beds (and arguably beds of the wrong type) are being delivered to the market (paragraph 9.1).
- 1.16 In these circumstances the contribution of this type of accommodation to future windfall numbers is unlikely.

Chart 1: Large “windfall” contribution



- 1.17 It is not a requirement that windfall should be included in the supply.
- 1.18 As highlighted by the HELAA Windfall sites are actually defined as sites not specifically identified in the development plan. In the case of Sheffield this is in fact almost all sites.
- 1.19 Paragraph 71 requires “compelling evidence” that these sites will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.
- 1.20 Given the fact that there has not been a comprehensive review of all potential sites for over 25 years in the city the use of an alternative definition of windfall and the impact of completions of student focused developments (the demand for which has now significantly reduced) does not represent compelling evidence.
- 1.21 As the evidence is far from compelling the inclusion of this element of windfall is not supported by evidence nor is it in accordance with the NPPF and as such it is unsound.
- 1.22 Action Required:**
- 1.23 The element of the supply should be removed from the supply and sites should be selected from those that have been submitted as part of the call for sites should be reconsidered to make up this shortfall.
- 1.24 Delete reference to Broad Locations of Growth in H1 c)
- 1.25 Amend table 1 “Housing Land Supply 2022 to 2039” and table 2 “Distribution of Housing Supply by Sub Area” as follows:
- a) Change proposed allocated sites figure (26,853) to
 - i) reflect the deletion of those sites that are not sound (see our Objections to Policies CA 1 to 6 and SA 2 to 7)
 - ii) Reflect the outcome of a revised site search including suitable green belt sites (see our objection on behalf of Strata, Hallam Land Management, Limes Development Ltd and Inspired Villages)

b) Delete 4,675 dwellings estimated supply from “Broad Locations of for Growth”.

c) **Objection to Policy H1 g)**

1.26 The following housing policy H1 states:

“g) A wide range of new housing will be supported to meet identified needs including custom build and self-build homes, older people’s independent living accommodation and housing to meet the needs of disabled people (Policy NC4).”

1.27 There have been no sites allocations identified for specialist older persons housing nor does the emerging Local Plan identify the areas of need referred to in the Objectives of the plan.

1.28 This falls short of the requirement in paragraph 63 which requires the needs to be assessed and reflected in the policy. At present there is no evidence as to the scale and type of older persons housing need in terms of type of dwelling, tenure or location. Without a clear assessment of the level of need these needs cannot and are not reflected in this policy. This is unjustified and the plan is unsound.

1.29 **ACTION**

1.30 Policy Change required:

a) The plan should identify the scale of need for different types and tenures of older persons accommodation, as set out in NC4 (as amended) compare these to existing levels of provision and identify what should be delivered in the plan period.



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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, Grace Clarkson, Stuart Garnett and Marcus Jolly
Organisation (if applicable): Hallam Land Management, Strata Homes, Inspired Villages and Lime Developments Limited
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: H1

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.

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

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Strategic Planning Research Unit
A specialist team within DLP Planning Ltd

For and on behalf of
**Hallam Land Management
Inspired Villages
Limes Developments Limited
Strata Homes (Yorkshire)**

**Sheffield Local Plan
Regulation 19 Consultation**

**Objections to the Local Plan
Policy NC3: Provision of Affordable Housing**

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

February 2023



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

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1.0 OBJECTION TO POLICY NC3: PROVISION OF AFFORDABLE HOUSING

- 1.1 NC3 requires 30% affordable (minimum) in most area outside of the City Centre although as highlighted by our objections to SP1, SP2 and H1 there are few allocations which will actually yield the higher level of affordable housing as there are so few proposed allocations.
- 1.2 Part C) permits financial appraisal to provide evidence to demonstrates not viable to provide.
- 1.3 It is important to note that the national Planning Practice Guidance (PPG) (Paragraph: 002 Reference ID: 10-002-20190509) states:
- “Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage.”*
- 1.4 The Whole Plan Viability Assessment (tables 10.3a to 10.g) shows that for many areas (including those areas in which most allocations are proposed) no form of housing development is viable if the proposed level of affordable housing is applied.
- 1.5 Our analysis of the proposed allocations is that 24,526 of the 27,229 allocated units are likely to require an individual viability analysis. This evidence that 90% of the proposed allocations will require an individual viability assessment is clearly contrary to the above guidance, and the policy requirement is unsound.
- 1.6 In addition to the general objection above the fact that Policy NC3 is being applied to all types of older persons accommodation is also unsound.
- 1.7 The definition in the policy states:
- ‘Housing developments’ – all types of housing falling in Use Classes C2 or C3 giving rise to new dwellings (it does not apply to institutional uses such as care homes). This includes specialist housing designated for older or disabled people. It covers both new build and conversions.*
- 1.8 The application of the affordable housing requirement to older person housing with care and C2 in particular is unsound as it is not supported by evidence.
- 1.9 The Whole Plan Viability Assessment concludes sheltered and extra care are not viable Table 10.12 (page 179) illustrates that none of the Extra Care sites considered returned a positive residual value and it states:
- “10.87 The results for these forms of development follow those for other flatted development, with the delivery of such development likely to be challenging. Based on the above analysis, there is limited scope for Sheltered or Extracare Housing to bear affordable housing. **It is recommended that this type of development is not subject to affordable housing.** Whilst these results are broadly consistent with those for flatted development in the lower value areas, they are less good than for flatted development in the higher value areas. The reason for this, at least in part is around the assumption for the net saleable area. Sheltered Housing is modelled with 20% circulation space and Extracare Housing is modelled with 30% circulation space, whilst mainstream flatted development is modelled with 10% circulation space.”*
- 1.10 This advice is repeated in section 12. Findings and Recommendations the Whole Plan Viability Assessment (paragraphs 12.94 to 12.96).
- “12.95 The results for these forms of development follow those for other flatted development, with the delivery of such development likely to be challenging. Based on the above analysis, there is limited scope for Sheltered or Extracare Housing to bear affordable*

housing.”

- 1.11 On the basis of the above evidence, it is clear that the Council have no evidential support for the inclusion of older persons housing (whether it be classed as C2 or C3) and that the definitions used for NC3 is unsound.
- 1.12 It is considered that there is sufficient evidence that the application of this policy is unsound for older persons accommodation, but it should be noted that the details of the assessment of schemes in the report are based on the representations from Retirement Housing Group (RHG) a trade group representing private sector developers and operators of retirement, care and Extra Care homes (paragraph 4.84) and is based on limited market evidence (paragraph 4.89) This is because of the very limited supply of Extra Care in Sheffield.
- 1.13 The report relies on the RHG who largely act for McCarthy Stone, Churchill and LifeStory and as such they do not represent Extra Care / Housing-with-Care / Integrated Retirement Communities which is how extra care has now evolved.
- 1.14 This is demonstrated by the assessment in paragraph 9.14 of the report which considers a private sheltered/retirement and an Extracare scheme have been modelled, each on a 0.5ha site. The development being assessed is very small compared to the Integrated Retirement Communities which are now being developed to deliver Extra Care these are between 60-250 units¹.
- 1.15 The Whole Plan Viability Assessment concludes TWICE that “there is limited scope for sheltered or Extracare housing to bear affordable housing” and “it is recommended that this type of development is not subject to affordable housing”.
- 1.16 There is no evidence to the contrary to support the inclusion of older persons housing in the definition for policy NC3 the policy as drafted is clearly unsound and requires modification.
- 1.17 National guidance is clear that policy requirements for affordable housing, should be set at a level that allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage.
- 1.18 The levels of 10% and 30% are not supported by evidence, in fact the evidence is that for older persons accommodation these should be 0%.
- 1.19 The Policy as drafted is unsound as it is neither justified or supported by national policy.
- 1.20 **Action:**
- 1.21 It should be noted that because of the council choice of allocations the policy will be mostly ineffective as set out in our objections to policies SP1, SP2 and H1.
- 1.22 Reduce to from 10% to 0% the requirement in part a) of NC3
- 1.23 Change the definition for NC3 as follows:
- 1.24 ‘Housing developments’ - all types of housing ~~falling in Use Classes C2 or C3~~ giving rise to new dwellings (it does not apply to specialist housing designated for older or disabled people or institutional uses such as care homes). It covers both new build and conversions.

¹ What is an Integrated Retirement Community? | ARCO (arcouk.org)



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RTPI

Chartered Town Planner



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, Grace Clarkson, Stuart Garnett and Marcus Jolly
Organisation (if applicable): Hallam Land Management, Strata Homes, Inspired Villages and Lime Developments Limited
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: NC3

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.



Strategic Planning Research Unit
A specialist team within DLP Planning Ltd

For and on behalf of
**Hallam Land Management
Inspired Villages
Limes Developments Limited
Strata Homes (Yorkshire)**

**Sheffield Local Plan
Regulation 19 Consultation**

**Objections to the Local Plan
Policy NC4: Housing for Independent and Supported Living**

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

February 2023



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1.0 OBJECTION TO POLICY NC4: HOUSING FOR INDEPENDENT AND SUPPORTED LIVING

a) The critical need and improving choice for older persons housing

1.1 The NPPF identifies that the need to provide housing for older people is **critical** along with offering older people a **better choice** of accommodation to suit their changing needs (Paragraph: 001 Reference ID: 63-001-20190626).

1.2 The National Planning Policy Framework glossary provides definitions of older people and people with disabilities for planning purposes, which recognise the diverse range of needs that exist. The health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support.

1.3 For plan-making purposes, strategic policy-making authorities will need to determine the needs of people who will be approaching or reaching retirement over the plan period, as well as the existing population of older people (Paragraph: 003 Reference ID: 63-003-20190626).

1.4 The PPG goes on to state:

*“Plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require. **They could also provide indicative figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period**”* (Paragraph: 006 Reference ID: 63-006-20190626).

1.5 The Local Plan has made no attempt to do this. This is a failure to positively plan to meet the critical housing need for older people and to enable a choice of such accommodation to be made available.

1.6 To address this failing the plan should identify not only the overall level of need for older persons housing but also the tenure and type, as these have different site requirements as is explained below.

b) Important considerations in making allocations for older person housing

i) *The Definitions of older people’s housing and care and viability of different types and tenures of provision.*

1.7 In drafting Local Plan policies to identify and then meet older persons housing needs it is important to understand the different type of provision as these have differing site and location requirements. The different types of older persons housing are explained in section 2 of the “Representation by Inspired Villages” included as Appendix 1 to this objection. This highlights that frequently local planning authorities overlook the extra care model, particularly the scale of Integrated Retirement Communities (IRC) and instead focus on retirement housing or care homes. The PPG stresses it is essential authorities recognise the different models which exist and plan to meet each of their respective needs. It is not appropriate to adopt a generic approach to provision as this is contrary to the NPPG which advocates providing a better choice of housing for older people (paragraph 2.5).

1.8 This report highlights that a homeowner is unlikely to be eligible for affordable extra care meaning that private extra care provision is going to be required to provide a choice for that older person.

ii) *Size of site for Integrated Retirement Villages*

1.9 As highlighted in “Representation by Inspired Villages” (Appendix 1 to this objection) the provision of IRC’s is an integral part of addressing the need for older persons housing.

- 1.10 In terms of deliverability of extra care, the representation (Appendix 1) highlights that the provision of the communal facilities, funding and infrastructure, means that there is a minimum scale required for a development to work, both financially and operationally.
- 1.11 The representation (Appendix 1) describes Inspired Villages model as approximately 150 units of accommodation (mix of cottages, bungalows and apartments ranging from 1, 2 and 3-beds) with some 210,000 sq.ft of floorspace, of which, approximately 20-25% would be communal facilities. The communal facilities typically include: a café/bar; restaurant; activity/craft room; meeting room; hairdressers; and a wellbeing centre comprising treatment rooms, fitness studio and pool (paragraphs 3.3 and 3.4).
- 1.12 It is important to note that these facilities are referred to as 'non-saleable space'.
- 1.13 In identifying sites suitable for older persons housing the Local Plan should consider sites of a size that can deliver IRCs as an essential part of the Plan's response to this critical need.
- iii) Ability for IRCs to compete for sites allocated for residential accommodation**
- 1.14 Paragraph 3.12 of the representation (Appendix 1) sets out that the development of specialist housing for older people differs from general market housing in a number of ways, which affects its viability. This all feeds into the consideration of whether or not it can fund additional obligations such as affordable housing, including:
- Funding;
 - The long-term operation, management and ownership of the site;
 - The provision, maintenance, upkeep and management of the significant communal
 - Facilities, including its delivery before the first unit is occupied; and staffing
- 1.15 These issues are compounded by differences in design efficiencies, gross development values, construction costs, and sale rates as explained in greater detail in "Issues Affecting Viability" (Appendix 2) of this objection.
- 1.16 All these factors are intrinsic in recognising the extra care model is very different from C3 residential, which directly affects deliverability, and in turn, the inappropriateness of applying policy intended to be applied to C3 residential. Local Plan Viability Assessments must assess the different typologies of specialist housing for older people in recognition of the different costs associated with them and in distinction from C3 residential.
- 1.17 In identifying sites suitable for older persons housing the Local Plan should consider allocating sites specifically for older persons housing and make it clear that these developments will not be subject to affordable housing requirements for the reasons set out above and explained in the appendices to this objection.
- c) The role of specialised accommodation for older people in releasing family housing**
- 1.18 The Government states in the introduction to their response to the consultation on "Changes to the current planning system" (16 December 2020) that it is a matter of inter-generational fairness that the new generation should have the chance to access the homes they deserve, and that the government must strive to build more homes.
- 1.19 In explaining the rationale for the Urban Centre Uplift the Government state (page 6, paragraph 5):
- "For example, planning for the right size homes can help address affordability and planning for specialist housing such as as older peoples' housing can have the knock-on effect of freeing up much needed family homes."*
- 1.20 These statements reflect the Government's earlier position in the Housing White Paper "Fixing Our Broken Housing Market" in which they state (paragraph 4.43, page 63):

“4.43 Helping older people to move at the right time and in the right way could also help their quality of life at the same time as freeing up more homes for other buyers.”

- 1.21 This approach is reflected in the NPPF (paragraph 65) which specifies that local planning authorities are expected to have clear policies for addressing the housing needs of all groups including older people.
- 1.22 It should be noted in this context that the English National Housing Survey (Paragraph 1.88 and Figure 1.12, Page 27) state that both the overall number and proportion of under-occupied households among owner occupiers in England increased between 2010-11 and 2020-21 from 49% (7.1 million households) to 53% (8.2 million households). No change was seen amongst renters over the same time period.
- 1.23 In conclusion, the Housing Crisis continues and the direction of travel of Government policy is to continue to seek ways in both the short term policy and guidance changes as well as though legislative changes to increase the supply of housing land and the delivery of housing to address this crisis.
- 1.24 It is a specific part of the Government’s policy response to increase the choice of specialist accommodation for older persons. This is regarded as important by the Government as it not only allows for older people to live independently for longer but also because it releases family housing, thereby providing new generations with the opportunities for household formation and home making that were enjoyed by earlier generations. As such the Government recognises that such specialist provision is an important tool in addressing inter-generational fairness. The Local Plan fails to have regard to national policy and guidance and this is unsound.

d) The evidence base for the plan: The Housing, Economic Growth and Demographic Modelling Report 2021

The reason the lack of engagement in identifying and planning for the housing needs of older persons is because this has not been a focus of the evidence base for the plan. The Housing, Economic Growth and Demographic Modelling Report was commissioned solely to provide a robust evidence base illustrating the relationship between housing requirements and jobs growth over the Sheffield Plan period (2021-38) (Paragraph 1.1). The purpose of the report was not to provide a basis for the Council to argue against meeting the minimum requirement for housing as set by the Standard Method

- 1.25 Paragraph 3.8 of this report identifies the greatest increases to be in older age groups (aged 65 and over) along with some notable population increases in the 25-29 and 50-59 age groups. The city also saw some population declines, particularly those aged 40-44.
- 1.26 Table 5.2 identifies the 65 and over as the fastest growing part of the population at 28.1% between 2021 and 2038 (this was modelled to delivery of 2,923 dwellings per annum).
- 1.27 Table 5.3 models the impact of a lower level of housing delivery (2,131 dwellings per annum) and projects a slightly lower rate of growth of residents 65 and at 26.7%.
- 1.28 This small change in older persons population contrasts in the change in the 16 – 64 population which varies significantly between these two projections which increases by 14.3% for the higher level of delivery compared to just 7.9% for the lower rate of delivery.
- 1.29 This report does not identify the need for specialist older persons housing. The consequence in the failure of the evidence base to undertake such an assessment results in a Local Plan which is not justified or in accordance with the NPPF paragraph 62.

e) The Sheffield and Rotherham SHMA July 2019

- 1.30 The executive summary (page v) states:

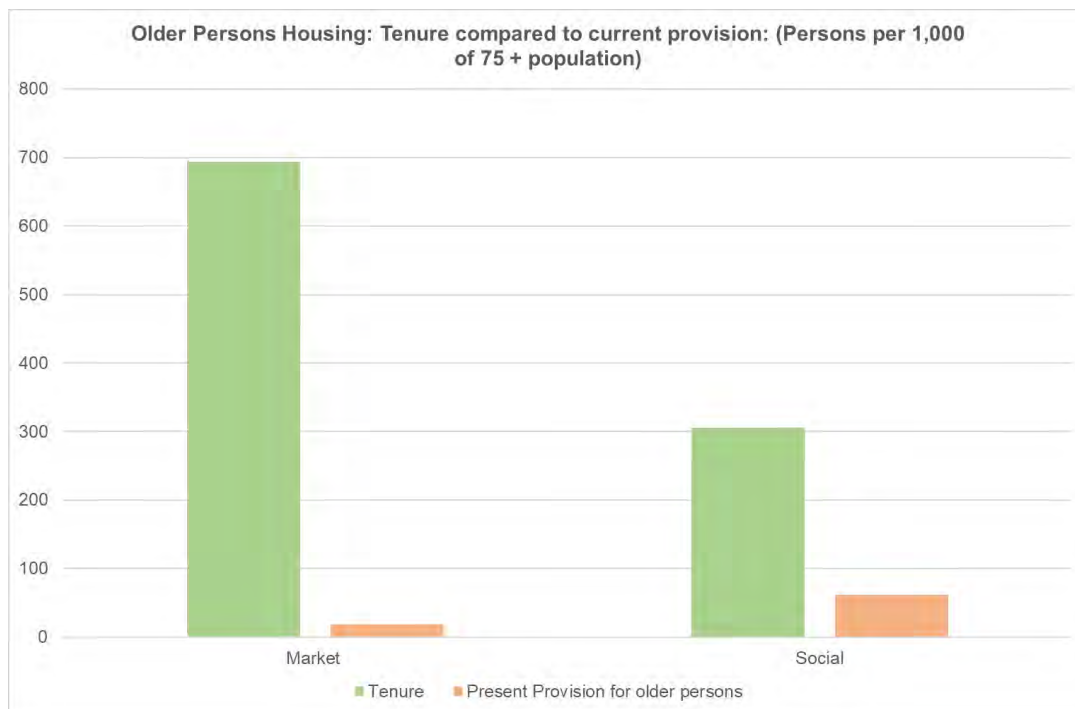
“Downsizing is the most significant motive for older people to move, followed by the desire to increase accessibility in the home and to be nearer family and friends. Downsizing may be constrained by the nature of supply and its affordability. Bungalows have an enduring appeal, though there is also evidence of significant interest in flats and apartments.

*The majority of those needing to move for additional support wish to stay in general needs accommodation, raising questions about the characteristics of the existing stock and accessibility standards of newly built housing. **There appears to be more demand for certain types of specialist accommodation in the SRHM than current models - such as the Housing for Older People Supply Recommendations (HOPSR) - predicts.** The expectations of those needing to move for additional support suggests demand for extra care housing is high in relation to current stock levels.”*

- 1.31 Table 5.12 “Expectations of future supported housing needs” (page 102) suggests that in Sheffield 10.9% of those who expected to move in the next 5 years would wish to move into extra care housing for older people and a further 12.1% into sheltered housing. These are high percentages when one considers these are percentages of total potential moves of the whole population (not just older people).
- 1.32 Paragraph 7.20 reports the results of the survey that approximately 5,400 households will need to move across the SRHM in the plan period, with an additional 11,500 stating they “don’t need to move but might want to”.
- 1.33 Applying the percentages of respondents who stated they needed Extra Care or Sheltered housing to those respondents who stated that they either need to move or might move in the next five years results in a need for between 589 and 1,842 Extra Care dwellings (10.9% of 5,400 and 16,900 (5,400 +11,500)) and between 653 and 2,048 Sheltered Housing units (12.1% of 5,400 and 16,900 (5,400 +11,500))
- 1.34 Paragraph 7.24 states:
*“Those anticipating a move into sheltered housing is relatively low in comparison to this and may reflect the changing nature of this provision. **Expected moves into extra care housing is very high** in comparison when we acknowledge the level of this provision in the SRHM is relatively low.”*
- 1.35 For Sheffield, the need for independent accommodation with visiting or live in support was estimated at 1,307 units and the need for extra care was 846 units (The Sheffield and Rotherham SHMA July 2019 Table 7.10).
- 1.36 Section 7 concludes:
“There would appear to be more demand for certain types of specialist accommodation in the SRHM than current models predict. The expectation of moving into extra care housing is high in relation to current stock levels”
- 1.37 The 2019 SHMA highlights the need for some types of older persons housing but does not quantify it, and it does not recognise the benefits to the wider housing market of “downsizing” or “right sizing”.
- f) The present level of provision of older persons housing in Sheffield**
- 1.38 The first chart on the next page shows that the present level of provision of both social rented and market older persons housing is low and the level of market provision (per 1000 of the population who are over 75) is extremely low.
- 1.39 The second chart on the next page shows that over half of the City residents over 75+ who live in market properties live in dwellings that have 3 or more bedrooms. Conversely most of the over 75 population who occupy social dwellings live in dwellings with just one or two

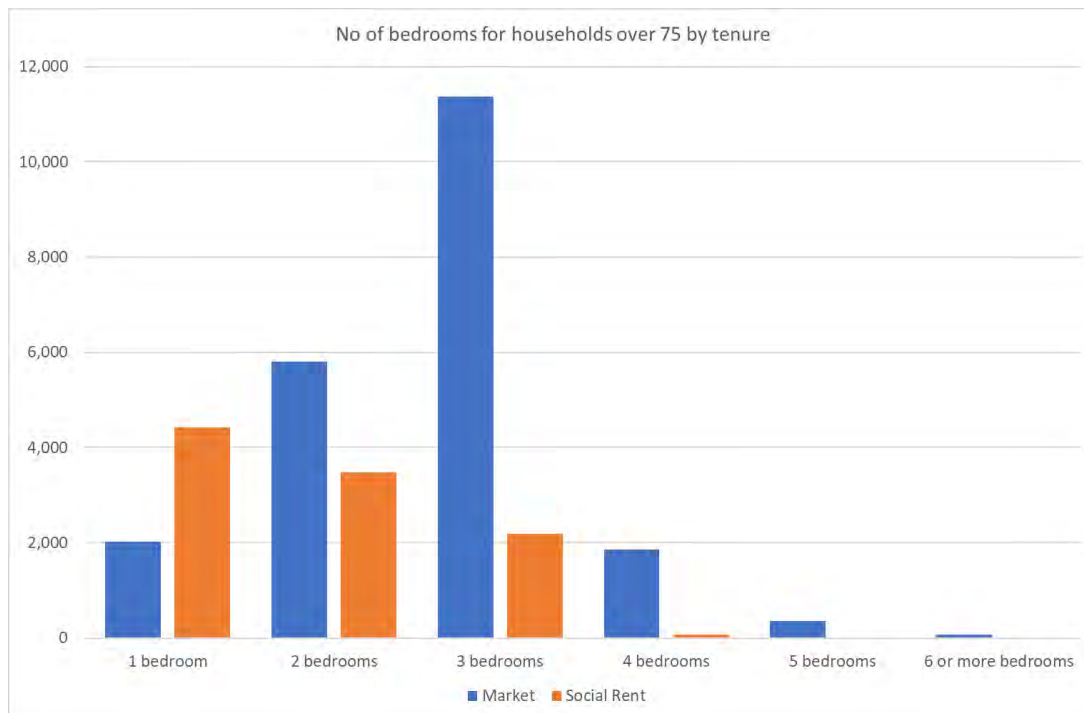
bedrooms. Although a common pattern, it does illustrate the potential level of demand that exists for purpose-built older persons market housing.

Chart 1: Older persons housing tenure and current provision



Source: Census 2011

Chart 2: Tenure and dwelling type of persons over 75



Source: Census 2011

- 1.40 Although the above suggest that there is the potential need for older persons market housing the levels as at 2011 were very low. This has changed and recent data shows that like other areas of the country there has been a significant increase in the take up of older persons market housing.

Table 1. Changes in supply of older persons housing between 2011 and 2023

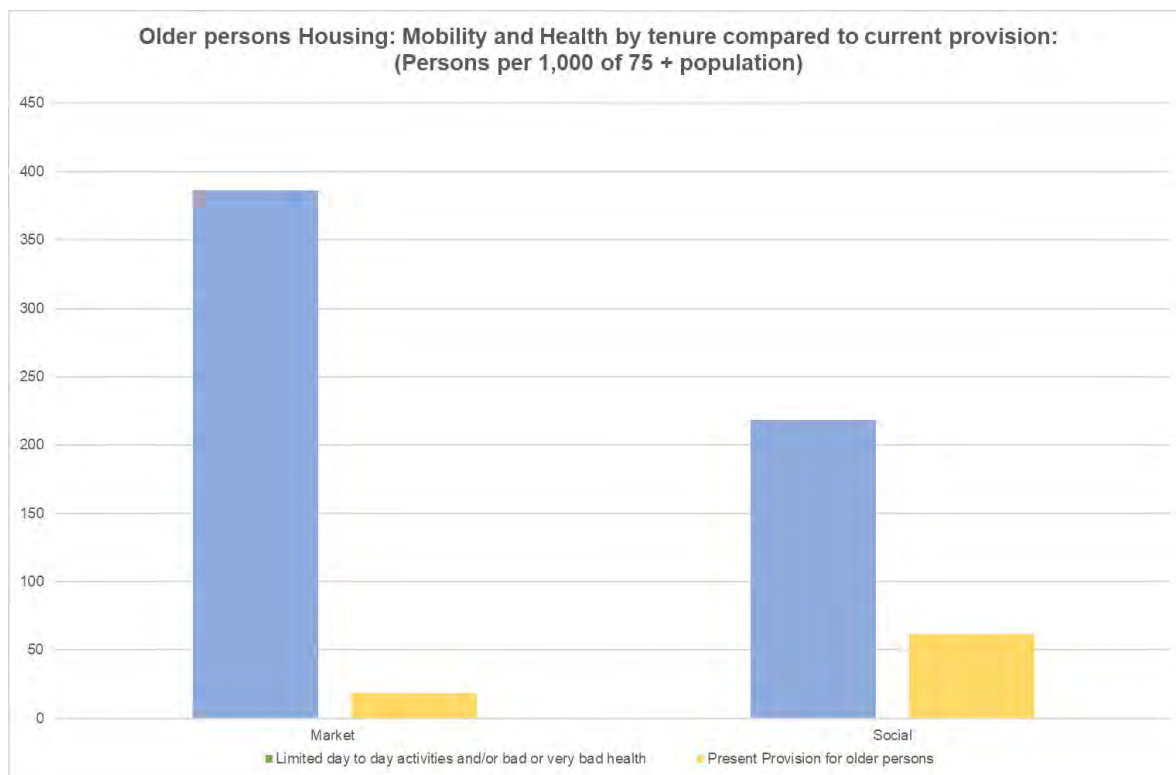
		2011	2023	Change
Age Exclusive	Social	248	362	46%
	Market	85	118	39%
Sheltered Housing	Social	1765	1919	9%
	Market	316	383	21%
Enhanced Sheltered Housing	Social	37	37	0%
	Market	0	0	0%
Extra Care	Social	442	715	62%
	Market	29	288	893%
Total	Social	2492	3033	22%
	Market	430	789	83%

Source: EAC data

- 1.41 In particular the rise in Extra Care is significant but not out of kilter with the national pattern which has seen an exponential growth in the need for market Extra Care housing (Older Persons Housing Needs Model (page 49 chart 9)¹.
- 1.42 According to the 2011 census there were 387 persons per 1000 over 75 years in age who were resident in market housing who were of fair health and limited day to day activities and/or bad or very bad health. This compares with the provision of 19 units per 1000 in terms of all specialist market accommodation. In contrast there were 219 persons per 1000 population 75 + that had limited day to day activities and/or bad or very bad health compared with specialist housing provision of 62 units per 1000 population 75 +.
- 1.43 Again, this suggests that the availability of any type of specialist older persons housing is proportionally much more limited for those occupying market properties who have health or mobility issues and wish to maintain their tenure choice when compared to those who reside in the social rented sector.

¹ https://www.dlpconsultants.co.uk/wp-content/uploads/2022/04/DLP-SPRU_Older_Person_Housing_Need_Research.pdf

Chart 3: Older persons housing: Mobility and health by tenure compared to current provision



Source: Census 2011

g) The future requirement for older persons housing in Sheffield

- 1.44 The future older persons housing need has been calculated using the methodology in Older Persons Housing Needs Model². This is based upon modelling forward the needs for older persons housing based upon choices that actual families have made in terms of how to satisfy their housing needs in later life, and cross referenced with survey results, international comparisons and other research findings including the Mayhew Review³. The model produces a national prevalence rate for the different types and tenures of older persons housing, this is then moderated to reflect the local housing market and the level of under occupancy.
- 1.45 The impact of applying local factors is to reduce the prevalence rates for Sheffield, nevertheless the outputs of the model still suggest that there is a considerable unmet need for older person market housing.
- 1.46 The resulting calculations are set on the next page. The first is based on the population projected in Housing, Economic Growth and Demographic Modelling resulting from the council’s capacity based approach. The second calculation would be the requirement based on the Standard Method modelled in the same report.

² Ibid

³ Mayhew Review Future-proofing retirement living: Easing the care and housing crises November 2022

Table 2. Results of the Older Persons Hosing Model for Sheffield (Policy on)

Factor			Factor		CT0621
Median House price	England	285,000	Percentage Home Ownership of 3 beds + by 75 +	England	6.2%
Median House price	Sheffield	182,000	Percentage Home Ownership of 3 beds + by 75 +	E41000275 Sheffield	4.7%
	Ratio	0.64			0.76

Calculation of Local Prevalence Rates of Owner Occupation					
Type	Tenure	Proposed National Prevalence rates	Proposed Local Prevalence rates (Median House Price ratio)	Proposed Local Prevalence rates (ownership & occupancy ratio)	Proposed Local Prevalence rates (combined ratio)
Age Exclusive	Social	14	14	14	14
	Market	6	4	5	4
Sheltered Housing	Social	42	42	42	42
	Market	140	89	107	98
Enhanced Sheltered Housing	Social	2	2	2	2
	Market	7	4	5	5
Extra Care 24/7 support	Social	20	20	20	20
	Market	44	28	34	31
Sum of individual projections		275	204	228	216

Application of Local Prevalence Rates of Owner Occupation - Units required						
Type	Tenure	Proposed Prevalence rates	2021	2026	2031	2038
Sheffield	75 +		46,889	51,562	53,982	61,128
Age Exclusive	Social	14	656	722	756	856
	Market	4	197	217	227	257
Sheltered Housing	Social	42	1,969	2,166	2,267	2,567
	Market	98	4,599	5,057	5,294	5,995
Enhanced Sheltered Housing	Social	2	94	103	108	122
	Market	5	230	253	265	300
Extra Care 24/7 support	Social	20	938	1,031	1,080	1,223
	Market	31	1,445	1,589	1,664	1,884
Sum of individual projections		216	10,128	11,138	11,661	13,204

Source: SPRU/EAC

Table 3. Results of the Older Persons Hosing Model for Sheffield (Standard Method)

Factor			Factor		CT0621
Median House price	England	285,000	Percentage Home Ownership of 3 beds + by 75 +	England	6.2%
Median House price	Sheffield	182,000	Percentage Home Ownership of 3 beds + by 75 +	E41000275 Sheffield	4.7%
	Ratio	0.64			0.76

Calculation of Local Prevalence Rates of Owner Occupation					
Type	Tenure	Proposed National Prevalence rates	Proposed Local Prevalence rates (Median House Price ratio)	Proposed Local Prevalence rates (ownership & occupancy ratio)	Proposed Local Prevalence rates (combined ratio)
Age Exclusive	Social	14	14	14	14
	Market	6	4	5	4
Sheltered Housing	Social	42	42	42	42
	Market	140	89	107	98
Enhanced Sheltered Housing	Social	2	2	2	2
	Market	7	4	5	5
Extra Care 24/7 support	Social	20	20	20	20
	Market	44	28	34	31
Sum of individual projections		275	204	228	216

Application of Local Prevalence Rates of Owner Occupation - Units required						
Type	Tenure	Proposed Prevalence rates	2021	2026	2031	2039
Sheffield	75 +		46,889	51,644	54,160	61,516
Age Exclusive	Social	14	656	723	758	861
	Market	4	197	217	228	259
Sheltered Housing	Social	42	1,969	2,169	2,275	2,584
	Market	98	4,599	5,065	5,312	6,033
Enhanced Sheltered Housing	Social	2	94	103	108	123
	Market	5	230	253	266	302
Extra Care 24/7 support	Social	20	938	1,033	1,083	1,230
	Market	31	1,445	1,592	1,669	1,896
Sum of individual projections		216	10,128	11,156	11,699	13,288

Source: SPRU/EAC

1.47 The tables above set out the gross requirement, and the tables below calculate the net need based on supply as at the beginning of the first quarter of 2023.

1.48 The tables also summaries the need into Housing with care and housing without care. This is because Enhanced Sheltered and Extra Care are essentially the same thing.

Table 4. The future need for older persons housing (Policy on)

Type	Tenure	Sheffield	2021	Net need 2021	2038	Net Need 2041
Age Exclusive	Social Landlord	313	656	343	856	543
	Ownership	167	197	30	257	90
Sheltered Housing	Social Landlord	1,820	1,969	149	2,567	747
	Ownership	415	4,599	4,184	5,995	5,580
Enhanced Sheltered Housing	Social Landlord	37	94	57	122	85
	Ownership	0	230	230	300	300
Extra Care 24/7 support	Social Landlord	715	938	223	1,223	508
	Ownership	288	1,445	1,157	1,884	1,596
Total		3,755	10,128	6,373	13,204	9,449

Table 5. Summary of future need for older persons housing (Policy on)

Type	Tenure	Sheffield existing units	Need 2021	Net need 2021	Need 2038	Net Need 2038
Older Persons Housing without Care	Social Landlord	2,133	2,626	493	3,423	1,290
	Ownership	582	4,796	4,214	6,252	5,670
Older Persons Housing with Care	Social Landlord	752	1,032	280	1,345	593
	Ownership	288	1,675	1,387	2,184	1,896

Source: SPRU

Table 6. Future need for older persons housing (Standard Method)

Type	Tenure	Sheffield	2021	Net need 2021	2039	Net Need 2041
Age Exclusive	Social Landlord	313	656	343	861	548
	Ownership	167	197	30	259	92
Sheltered Housing	Social Landlord	1,820	1,969	149	2,584	764
	Ownership	415	4,599	4,184	6,033	5,618
Enhanced Sheltered Housing	Social Landlord	37	94	57	123	86
	Ownership	0	230	230	302	302
Extra Care 24/7 support	Social Landlord	715	938	223	1,230	515
	Ownership	288	1,445	1,157	1,896	1,608
Total		3,755	10,128	6,373	13,288	9,533

Table 7. Summary of future need for older persons housing (Standard Method)

Type	Tenure	Sheffield existing units	Need 2021	Net need 2021	Need 2038	Net Need 2038
Older Persons Housing without Care	Social Landlord	2,133	2,626	493	3,445	1,312
	Ownership	582	4,796	4,214	6,292	5,710
Older Persons Housing with Care	Social Landlord	752	1,032	280	1,353	601
	Ownership	288	1,675	1,387	2,198	1,910

Source: SPRU

1.49 The conclusion of this assessment is that there is a considerable level of unmet need for older persons market housing whether the overall level of housing provision is made for the council's capacity constrained "Policy on" figure or the minimum level required by the Standard Method.

h) The local policy context for the provision of specialist older persons housing

1.50 The Plan Aims and Objectives for thriving neighbourhoods and communities include:

"To create a housing market that works for everyone and which provides quality, choice and affordability.

To ensure Sheffield has an adequate supply of residential development land so the city can meet its requirement for new housing.

To significantly increase the supply of affordable housing, accessible market housing and specialist housing for older people, disabled people and other vulnerable groups, particularly in places of greatest need.

i) Objection to Policy H1 (g)

1.51 The following housing policy H1 states:

"g) A wide range of new housing will be supported to meet identified needs including custom build and self-build homes, older people's independent living accommodation and housing to meet the needs of disabled people (Policy NC4)."

- 1.52 There have been no site allocations identified for specialist older persons housing nor does the emerging Local Plan identify the areas of need referred to in the Objectives of the plan.
- 1.53 This falls short of the requirement in paragraph 63 which requires the needs to be assessed and reflected in the policy. At present there is no evidence as to the scale and type of older persons housing need in terms of type of dwelling, tenure or location. Without a clear assessment of the level of need these needs cannot and are not reflected in this policy. This is unjustified and the plan is unsound.
- 1.54 **ACTION**
- 1.55 **Policy Change required:**
- a) **The plan should identify the scale of need for different types and tenures of older persons accommodation, compare these to existing levels of provision and identify what should be delivered in the plan period.**
- j) **Objection to Policy NC4**
- 1.56 Part 2 of the emerging policy identifies (paragraph 4.17 that the population of older people is forecast to increase significantly by 2039. There is no recognition within the plan of the need for or the role of (market and affordable) extra care. In fact, the explanation for policy NC4 concentrates on the provision of dwellings to meet the needs of disabled older persons and others and not the housing needs of older persons.
- 1.57 The policy NC4 Policy NC4: Housing for Independent and Supported Living states:
*“Specialist housing designated for older or disabled people.
Specialist housing designated for older or disabled people will be promoted in areas of need. Proposals will be acceptable where:
c) local health facilities would have sufficient capacity to cater for additional needs arising from the development; and
d) the accommodation would be close to essential services, particularly public transport, shops, and health services
All specialist housing designated for older or disabled people, including supported accommodation (including hostels providing an element of care), and non-supported accommodation should be wheelchair adaptable or fully wheelchair accessible throughout. The provision of secure internal storage for mobility aids will be required.”*
- 1.58 Contrary to NPPF paragraph 63 the plan seeks to actually restrict the provision of specialist housing for older persons in areas where health facilities do not have capacity to cater for additional needs arising from the development. Not only does this display a lack of knowledge over how many types of provision reduce the impact on the health services but also means that in areas of greatest need the policy stance would be not to meet this need because of the perceived impact on health services.
- 1.59 There is no evidential basis for this policy approach. Health spending (both Local Authority and NHS) on the average 80-year-old is £6,200 a year this rises from £2,700 for 65 year olds (ONS (2018) Living longer: how our population is changing and why it matters. Figure 24).
- 1.60 The costliest hospital admissions for older people tend to result from falls and fractures, dementia, and strokes.
- 1.61 According to the report “Healthier and Happier - An analysis of the fiscal and wellbeing benefits of building more homes for later living WPI Strategy 2019” housing solutions such as Extra Care housing which reduce these risks may result in savings to the NHS.

- 1.62 These savings have been calculated in the “Healthier and Happier - An analysis of the fiscal and wellbeing benefits of building more homes for later living WPI Strategy 2019”. In respect of extra care housing the following benefits have been calculated to arise. The provision of the 1,910 extra care dwellings that are forecast to be required have the potential to mitigate the adverse health outcomes as set out in the table below.
- 1.63 In this example the savings to the NHS from the provision of 1,910 extra care units (assuming the average occupancy of 1.37 persons per unit within an Inspired Villages development = 2,617 persons) would be over £9 million a year as set out in the table below.

Table 8. Saving to NHS and Council delivered by Extra Care Housing

Calculation of population				
Number of market units with care (SM based)	1910			
Average occupancy	1.37			
Number of persons	2616.7			
Adverse health outcomes / cause:	Mainstream housing, pp >80yrs Cost (£)	Homes for Later Living housing, pp >80yrs Cost (£)	Saving (£)	Savings for 2,617 persons in market housing with care
Fracture or serious injury / falls	811	300	511	1,337,134
Dementia / loneliness	2,119	1,874	245	641,092
Stroke incapacitation / delayed action	477	343	134	350,638
Pneumonia, heart attacks, arthritis / cold homes*	205	0	205	536,424
Visits to GP and A&E attendance / (various)	267	195	72	188,402
Subtotal (prevention)	3,878	2,712	1,166	3,051,072
Efficiencies:				
Utilisation of public funded institutional care**	1,812	0	1,812	4,741,460
Use of public-funded home care services	984	820	164	429,139
Use of disabled facilities grant money***	349	0	349	913,228
Subtotal (efficiencies)	3,145	820	2,325	6,083,828
Total	7,023	3,532	3,491	9,134,900

Source: *Healthier and Happier - An analysis of the fiscal and wellbeing benefits of building more homes for later living WPI Strategy 2019*

1.64 ACTION

1.65 Policy Change required:

- a) The plan should identify specific sites which would deliver dwellings to meet the need for different types and tenures of older persons accommodation as identified in the new table in the policy (see below).
- b) And the policy should be amended as follows.
Specialist housing designated for older or disabled people.

In light of the critical need for Specialist housing for older or disabled people identified by Government designated will be promoted in areas of need. Proposals This plan allocates sites to meet the minimum requirement as set out in the table below.

Notwithstanding these allocations given the “critical need” identified there will be a presumption in favour of provision ~~acceptable~~ where the site is well related to an existing settlement with appropriate access to services and facilities either on or off site.

~~c) local health facilities would have sufficient capacity to cater for additional needs arising from the development; and~~

~~d) the accommodation would be close to or have access to essential services, particularly such as public transport, shops, and health services~~

~~All specialist housing designated for older or disabled people, including supported accommodation (including hostels providing an element of care), and non-supported accommodation should be wheelchair adaptable or fully wheelchair accessible throughout. The provision of appropriate secure internal storage for mobility aids will be required.”~~

~~Table setting minimum level of allocations for older persons housing:~~

Type	Tenure	Allocations to 2038
Older Persons Housing without Care	Social Landlord	1,312
	Ownership	5,710
Older Persons Housing with Care	Social Landlord	601
	Ownership	1,910

~~Add the following to the definitions:~~

~~Older persons housing with care: This includes Extra Care and Enhanced Sheltered Housing~~



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RTPI

Chartered Town Planner



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, Grace Clarkson, Stuart Garnett and Marcus Jolly
Organisation (if applicable): Hallam Land Management, Strata Homes, Inspired Villages and Lime Developments Limited
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: NC4

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.

Representation by Inspired Villages

To support the practical delivery of much-needed specialist accommodation to meet the needs of an ageing population (version 3)

Inspired
Villages
The *best* years of your life?


Legal &
General



Representation by Inspired Villages

To support the practical delivery of much-needed specialist accommodation to meet the needs of an ageing population (version 3)

Foreword

We are not just getting older, we are living longer with rising health and care needs and by 2035, one in four of the population will be over 65 years old. With the unprecedented increase in the number of older people, a new approach is required to respond to the challenges of loneliness, isolation, unsuitable housing, unresponsive and rigid services.

We need to create environments where the chances of living well for longer, independently and actively are maximised, recognising the importance of social engagement and meaningful relationships to mitigate pressures on the health and social care system.

The planning system has struggled to keep up with the emerging models in the later living sector in recent years. This report is intended to assist local planning authorities with their development plan preparation to produce positive policies that will enable the housing needs for older people to be met, in full, particularly as such needs have been identified by the government's national planning guidance to be critical.

Legal & General entered the later living sector in the UK in August 2017, marking the first major institutional investment into this critically under supplied segment of the residential market. In August 2021, Inspired Villages entered into a new Joint Venture with Legal & General and NatWest Group Pension Fund providing the equity and the expertise to deliver at scale, an Integrated Retirement Community operator with at least 34 sites by 2026. This will provide in excess of 5,000 extra care units for nearly 7,000 older persons, making an important contribution to the specialist housing sector.

Phil Bayliss, Chairman, Inspired Villages

Inspired Villages recommendations

Inspired Villages makes the following eight recommendations which should be incorporated into the emerging local plan to support the practical delivery of specialist housing for older people and meet the ever-growing need.

The local plan and its evidence base should:

1. **Be based on a clear understanding of specialist housing for older people** drawing upon national guidance and other sources, particularly regarding the use class and recognise the different types of specialist housing which exist.
2. **Be based on a robust evidence base that identifies the housing requirements of specialist housing for older people** drawing upon appropriate sources recognised within the sector.
3. **Set out clear and specific policy / policies to address housing needs for older people** (e.g. integrated retirement communities and extra care), on land in, or adjacent to settlement boundaries where those settlements that provide a certain level of services and facilities, where the proposed development provides sustainable transport measures and communal facilities and where there is an identified need.
4. **Set indicative figures or a range for the number of specialist housing for older people needed** across the plan area throughout the plan period and this must recognise the diverse models that exist.
5. **Monitor the delivery of housing for older people and deliver action plans to address under provision.**
6. **Consider the inclusion of specialist housing for older people within appropriate strategic or other site allocations** subject to consideration of need, site and locational factors and deliverability.
7. **Recognise the significant benefits associated with specialist housing for older people** and this can inform planning decision making.
8. **Set out different policy requirements**, for example, affordable housing, for an integrated retirement community (C2 use) compared to residential development (C3 use) and the evidence base and viability should take into account the different circumstances between the uses (e.g. integrated retirement communities provide significant levels of communal facilities/non-saleable floorspace and their ongoing maintenance and management, staffing, funding, etc). Where there is doubt, policies should provide sufficient flexibility for specific circumstances, which may include viability, to be assessed through a planning application.

1. Introduction

- 1.1. **There is a significant existing shortage of suitable accommodation to meet the needs of the ageing population in the UK and the planning system must take positive measures to address this.** The National Planning Policy Guidance (NPPG) identified in mid-2016 there were 1.6m over-85s and this will double to 3.2m by 2041.¹ The majority of the ageing population are able to, and want to, live independently for as long as possible, and will not require intensive care home accommodation until much later in life, if at all. In this period older people will reconsider whether their home is most suitable for their current needs and are more likely to require increasing assistance with day-to-day tasks and managing their health. There is a need for a variety of types of specialist accommodation for older people, to meet the varying needs of individuals.
- 1.2. The coronavirus pandemic has brought into focus that the current system of older people remaining in unsuitable housing to meet their needs or care homes is not appropriate. An Integrated Retirement Community (IRC) model addresses the deficiencies of the existing options, and this is an opportunity to provide appropriate homes for older people to allow them to age in place with access to care and facilities on-site to meet their day-to-day needs.
- 1.3. What is not clear is how these different types of development should be classified, and delivered, by the planning system. **There is no consistent approach to local plan policies looking to tackle this issue.** Some local plans might support the principle of the delivery of specialist accommodation for older people, but do not necessarily deal with delivery in a practical sense.
- 1.4. A joint Irwin Mitchell and Knight Frank report '*Unlocking potential for senior living*' (July 2020)² identified **50% of Councils do not have any specific planning policies nor site allocations to make provision for housing for older persons.**
- 1.5. There has been an inconsistent approach to plan-making and decision taking at a local level across the country, which inevitably causes uncertainty for developers and operators within the sector, which results in delay to delivery and reduces investor confidence. **The lack of specific local plan policies and misinterpretation of the Use Classes Order are particular issues.**
- 1.6. This Local Plan representation provides an operator's perspective, to provide industry insight to inform your plan-making process, which can be used to develop planning policies that are better placed to support delivery and in compliance with the objectives of the National Planning Policy Framework (NPPF) and the NPPG.
- 1.7. This representation makes 8 recommendations (see page 3) for the local planning authority to incorporate within your emerging local plan to ensure the delivery of much-needed older people's housing.

¹ NPPG Paragraph: 001 Reference ID: 63-001-20190626

² [Unlocking Potential for Senior Living Development 2020](#)

2. Definitions of older **people's housing and care**

- 2.1. Since the late 1970s, accommodation for older people was generally limited to three options: remaining in the family home; moving into sheltered housing; or moving into a care home.³ A large volume of sheltered housing was developed in the 1980s to 2000s, predominantly by McCarthy & Stone and registered providers of social housing. This stock forms the bulk of existing provision in the UK.
- 2.2. In recent years there has been a considerable reduction in the availability of funding with spending falling in real terms,⁴ and local authorities seek alternative, more cost-effective means of providing care and accommodation for those who would otherwise be funded to move into residential care.
- 2.3. Furthermore, those who would otherwise fund their own care in a care home seek alternative options to retain their independence for as long as possible. The opportunity to retain a level of equity from an existing home by moving at an earlier stage to specifically designed housing for older people from properties that are often larger and difficult to maintain, and where increasing levels of care can be bought in as required, can serve to delay or prevent a move into a care home.⁵
- 2.4. The government's *'Housing for Older and Disabled Guidance (2019)'*⁶ set out four types of specialist housing to meet the diverse needs of older people and we also provide additional points from the Associated Retirement Community Operators (ARCO),⁷ who are the main body representing the retirement community sector in the UK, (*in underlined italics, below*), with regards the size of schemes:
 1. **Age-restricted general market housing:** Usually for people aged 55 and over. May include some shared amenities such as communal gardens but does not include support or care services.
 2. **Retirement living or sheltered housing:** Usually consists of purpose-built flats or bungalows with limited communal facilities such as a lounge, laundry room and guest room. Does not generally provide care services but provides some support to enable residents to live independently (may include 24-hour on-site assistance and a warden or house manager). The housing provided is available on a variety of tenures: shared ownership, long leasehold and rent (social and private). *Typically, 40–60 units.*

³ NPPG Paragraph: 001 Reference ID: 63-001-20190626

⁴ Bottery S, Ward D and Fenney D (2019) Social Care 360. The King's Fund

⁵ The University of Sheffield and Dwell (2015). Extra-care Housing: Brief development

⁶ Gov.UK (2019) Housing for Older and Disabled People

⁷ Associated Retirement Community Operators (ARCO) website: www.arcouk.org

3. **Extra care housing or housing-with-care (assisted living or independent living):** Usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available, if required, through a registered on-site care agency. Residents can live independently with 24-hour access to support services and staff, and meals are also available. Often there are extensive communal areas, spaces to socialise or a well-being centre. In some cases, these developments are known as retirement villages or retirement communities – with the intention for residents to benefit from varying levels of care as time progresses. *Typically, 60–250 units.*

For the avoidance of doubt, an Inspired Villages Integrated Retirement Community falls within extra-care housing.

4. **Residential care homes and nursing homes:** Provide individual rooms (usually with en-suite) within a residential building, together with a high level of care (24-hour), meeting all activities of daily living. Also includes dementia care homes. Range of facilities and activities including gardens, lounges and dining rooms. *Sizes of homes vary considerably. Registered and regulated by the Care Quality Commission (CQC) in England, (by the Regulation and Quality Improvement Authority (RQIA) in Northern Ireland and the Care Inspectorate in Scotland and the Care Inspectorate in Wales (CIW)).*

Figure 1. What is an Integrated Retirement Community (www.arcouk.org/what-retirement-community)



- 2.4 Until more recently, extra care or 'housing-with-care' was not widely recognised as providing an alternative to residential care. However, such accommodation maintains an individual's independence within their own specifically designed property with a range of on-site services and, importantly, where increasing levels of care can be bought in as needs change. Having evolved in recent years to respond to the growing demand from older people for greater choice, quality and independence, the number of models and designs have made it difficult to define this form of accommodation, however, the Care Services Improvement Partnership (2011)⁸ identified three common features:

- i. A type of residential accommodation, a person's own home. It is not a care home or a hospital and this is reflected in its occupancy through ownership, whether it be lease or tenancy;
- ii. It is accommodation that has been specifically designed, built or adapted to facilitate the care and support requirements of its owners or tenants; and
- iii. Access to care and support is available 24 hours per day.

2.5 Frequently local planning authorities overlook the extra care model, particularly the scale of an IRC and instead focus on retirement housing or care homes. It is essential authorities recognise the different models which exist and plan to meet each of their respective needs. It is not appropriate to adopt a generic approach to provision as this is contrary to the NPPG which advocates providing a better choice of housing for older people.

2.6 Private extra care development in the UK broadly reflects the economic boom of the middle part of the 2000s (see Table 1 below). Between 2005 and 2009 there was an acceleration of development, particularly IRC's. However, following the downturn in the residential housing market, the number of new, private extra care developments reduced significantly from 2009. Such developments have increased again from the mid-2010s resulting from the ever-increasing ageing population but provision tends to be well behind other types of specialist housing.

Recommendation One:

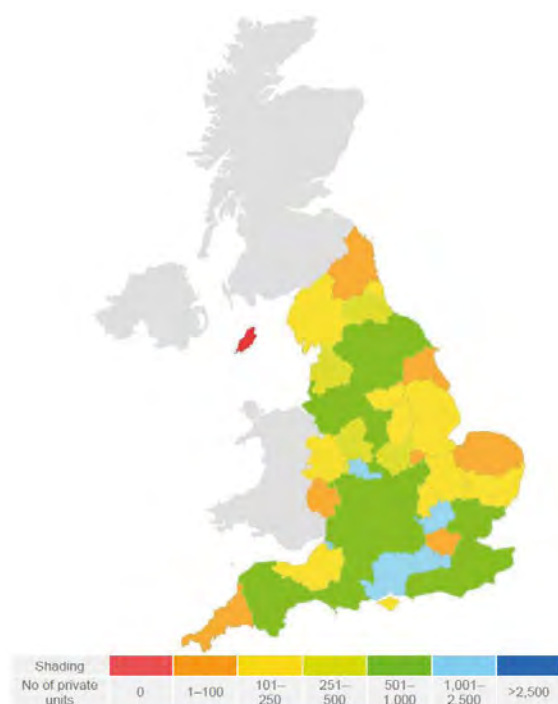
Local plans must be based on a clear understanding of specialist housing for older people and the Use Classes Order drawing upon the PPG and other relevant guidance.

Table 1.

Older people's housing by age of construction					
Decade	Schemes	Total units	Private units	% of private units	Average scheme size
Unknown	487	11,701	9,384	5.4	24
Prior to 1970	130	2,895	2,171	1.3	22
1970s	50	1,405	948	0.6	28
1980s	1,886	66,086	59,987	34.8	35
1990s	864	30,018	26,418	15.3	35
2000s	932	40,054	34,963	20.3	43
2010s	1,079	52,632	37,107	21.6	49
Forthcoming	46	2,184	1,141	0.7	47
Total	5,474	206,975	172,119	100.0	37.8

Source: Carterwood, EAC database May 2019. (Note. EAC database includes all schemes, including private rental and 'other' tenure types, the latter making up a small proportion of total units. 'Unknown' schemes are likely to be older developments where no date of construction has been provided.)

Figure 2. Private older people's housing per county with on-site care and facilities



Source: Carterwood, EAC database May 2019

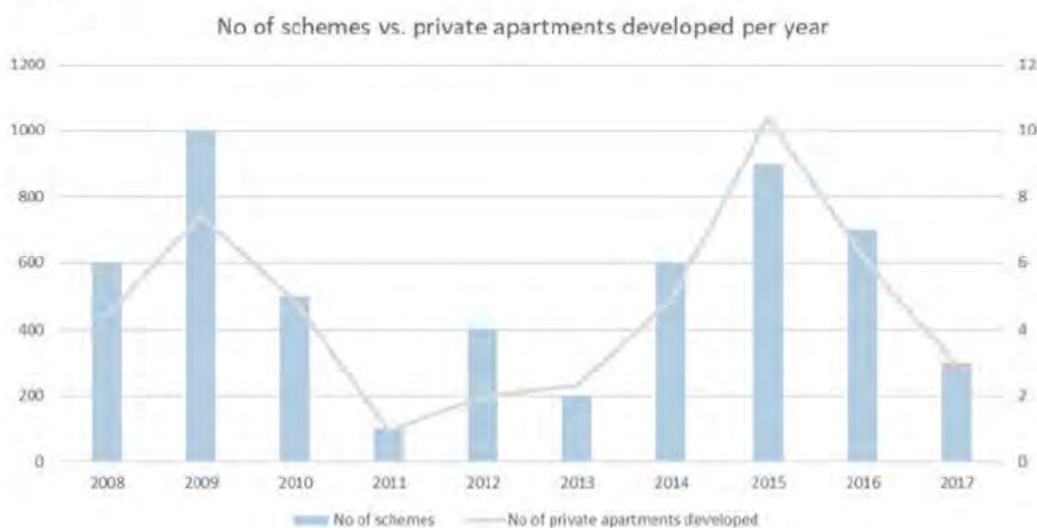
- 2.7 The average size of specialist housing for older persons' developments has increased year on year, driven by larger IRC / retirement village style developments and to achieve economies of scale when providing on-site care and facilities.
- 2.8 It is important that a range of tenure types are provided for, to meet the housing needs of older people. For the private sector, the decision to acquire (usually leasehold) or rent an extra care unit is choice driven, whereas in the affordable sector it is more likely to be based on need.
- 2.9 For those choosing to acquire or rent a private extra care unit they should be able to choose the type of accommodation that best suits their circumstances and consequently planning policy needs to support the delivery of housing types that meet the relevant local demand. **In areas where there is high provision of home ownership, the policy should encourage higher rates of private extra care delivery to match tenure.** Put simply, a home owner is unlikely to be eligible for affordable extra care meaning that private extra care provision is going to be required to provide a choice for that older person.
- 2.10 Figure 2 above shows the geographic distribution by county in England of private older people's housing units where on-site care and facilities are provided. Overall, it shows an historic low level of provision across England resulting in under supply and increasing needs.
- 2.11 There are a variety of site size requirements dependent upon the operator, the proposed scheme and its location. They tend to range between 0.5 to 1.5 acres for traditional retirement housing schemes and care home schemes where a lower level of amenities is provided on site and fewer units, up to approximately 10-12 acres for the comprehensive IRC/extra care schemes.

- 2.12 Despite rising sales rates and a demand that is tending to outstrip supply, the UK has only 4,535 private older people's housing schemes, including 124 'care villages' at 2018 (based on the EAC definition of care village).⁹ *Note: Care village is the same as an IRC.*
- 2.13 There have been fluctuations in new developments during the ten years to 2017 (see Table 2 below), which compares the number of schemes developed against the number of private apartments (or units) per year. These developments are operated by, amongst others: Audley Group, Inspired Villages, Retirement Villages, Richmond Villages, LifeCare Residences, The ExtraCare Charitable Trust, Joseph Rowntree Housing Trust, MHA and St Monica Trust.

Recommendation Two:

The local plan must be based on a robust evidence base that identifies the housing requirements of specialist housing for older people drawing upon appropriate sources recognised within the sector.

Table 2



Source: *Carterwood*.

⁹ Hartley, B (2018) Care Village Editorial. Healthinvestor

3. Deliverability & Use Class

- 3.1. Planning policies typically require there to be an identified need and for development to be proportionate to its surroundings. However, in terms of deliverability for extra care, for the communal facilities, funding and infrastructure, there is a minimum scale required for a development to work, both financially and operationally.
- 3.2. A development requires a minimum scale of development to be viable whilst meeting the identified need. This means it is not realistic to disaggregate an IRC into smaller amounts as it would not be viable for an operator to deliver the units and the associated facilities and care.
- 3.3. A 'standard' model for Inspired Villages is for approximately 150 units of accommodation (mix of cottages, bungalows and apartments ranging from 1, 2 and 3-beds) with some 210,000 sq.ft of floorspace, of which, approximately 20-25% would be communal facilities.
- 3.4. Communal facilities typically include: a café/bar; restaurant; activity/craft room; meeting room; hairdressers; and a wellbeing centre comprising treatment rooms, fitness studio and pool. These facilities are referred to as 'non-saleable space'. The extent of communal facilities provided within an Inspired village is significant and are accessible to residents, their visitors and also non-residents (wellbeing centre on a membership basis) – this is not a gated community but designed to be an important part of the local community.
- 3.5. Planning policies must be sufficiently flexible to take account of current identified and projected need for older people's housing. The introduction of an exceptions-based policy will assist the delivery of extra care to meet the *critical* need identified by the Government and must reflect the different typologies of specialist housing for older people. A generic approach is inappropriate as this does not serve to meet the identified needs nor provide the choice required for older people.

Recommendation Three:

The local plan should **set out clear and specific policy/policies to address housing needs for older people (e.g. integrated retirement communities / extra care):**

- 1. On land in, or adjacent to settlement boundaries where those settlements provide a certain level of services and facilities.**
- 2. Where the proposed development provides sustainable transport measures and communal facilities.**
- 3. Where there is an identified need.**

Use Class

- 3.6. When determining the use class for specialist older people's housing, **the key considerations are the level of care and scale of communal facilities provided.**¹⁰ Indeed these are the key reasons why an elderly person chooses to move. Extra care is not accommodation alone. It provides both 24-hour care and communal facilities, which enables individuals to live independently in their own home, with the security and amenities that allow for peace of mind.
- 3.7. Such developments are C2 rather than C3 use class, even when there is no registered care home as part of the development. This has been identified in planning appeals such as West Malling in 2018, amongst others.^{11 12 13} LPAs seeking to wrap older persons housing into a general residential C3 use or applying affordable housing policy based upon a deficient evidence base acts as a barrier to delivery.
- 3.8. In July 2018, ARCO stated *'More work needs to be done, including clear guidance for councils to make provision for the different needs of older people. Without this there is a risk of the NPPF becoming a blunt instrument which fails to make a difference to planning decisions'* and supported a *'more explicit statement that C2 use classes include genuine housing with care developments.'* Inspired Villages is an ARCO Approved Operator and adheres to their Consumer Code which provides a benchmark for good practice in the sector.
- 3.9. The reason for the lack of clarity is because the Use Classes Order pre-dates the introduction of the variety of options for accommodation (with or without care) that now exist. The Use Classes Order is in need of updating.
- 3.10. The 2019 report *'Shining a spotlight on the hidden housing market'*¹⁴ considered that a new use class should be created specifically for specialist housing for older people as they have previously fallen under C2, C3 or sui generis. This has led to inconsistencies in terms of delivery, location and affordable housing provision between local authorities. The term specialist housing for older people covers a range of types of development. Some of those types of development do not involve the delivery of care, nor the inclusion of facilities that support the delivery of care and on-going 'wellbeing' and it is generally agreed that those developments fall within use class C3, whereas an IRC or extra care falls fully within C2.
- 3.11. **It is essential that the Local Plan's evidence base and viability assessment properly understands the IRC model and its associated extra significant costs.** It is not appropriate for a C2 development to attract the same affordable housing requirement as C3 residential which does not have such costs to development. For example, C2 extra care construction costs are significantly higher than C3 residential and phasing is longer; sales rates are slower; and the extensive communal facilities are delivered upon first occupation – a significant capital cost (including cost of staffing).
- 3.12. Specialist housing for older people differs in a number of ways, which affects its viability. This all feeds into the consideration of whether or not it can fund additional obligations such as affordable housing, including:

- Funding;
- The long-term operation, management and ownership of the site;
- The provision, maintenance, upkeep and management of the significant communal facilities, including its delivery before the first unit is occupied; and
- Staffing

3.13. These factors are intrinsic in recognising the extra care model is very different from C3 residential, which directly affects deliverability, and in turn, the inappropriateness of applying policy intended to be applied to C3 residential. **Local Plan Viability Assessments must assess the different typologies of specialist housing for older people in recognition of the different costs associated with them and in distinction from C3 residential.**

3.14. The following principles are drawn from recent appeal decisions, for example, Retirement Village Group's appeal at Lower Shiplake¹⁵ grapples with use class and the application of affordable housing policies:

- Though it may be reasonable to consider individual self-contained units of accommodation as dwellings, where the proposed development forms a collection of units of accommodation with extensive communal facilities, beyond that reasonably likely to be provided in C3 residential accommodation, and which clearly exists to serve the residents, both the units and the communal facilities are intrinsic to each other forming part of the same planning unit.
- The planning unit as a whole exists to provide accommodation with care, to people in need of care, falling wholly within use class C2.
- Where the units are occupied only by residents in need of, and receiving, a minimum level of care, their existence is founded on the need for, and delivery of accommodation with care, for those in need of care, in direct correlation with use class C2. Where this is secured through occupation restrictions set down within a legal agreement, the terms of the grant of permission mean it can only be used for use class C2.
- Where care and assistance are provided at additional cost to an occupant, the occupant is only likely to choose to live there if they are in need of that care and assistance.
- Care can cover a very broad range of activities that assist people in carrying out everyday tasks, which may become increasingly difficult with age. What is important is that the planning unit is designed and exists to provide care, and which can increase over time. The physical attributes of the building, the interconnectivity between accommodation and facilities and the extent of communal facilities are all relevant to assessing the nature of the development.

¹⁵ Paragraph 43 - Appeal Decision APP/Q3115/W/19/3220425 Land to the east of Reading Road, Lower Shiplake, 14 October 2019

- 3.15. The fundamental point arising from this is that these developments exist to provide accommodation with the availability of care and the provision of extensive communal facilities. With regard to these points and the guidance provided in the PPG: *'when determining whether a development for specialist housing for older people falls within C2 (Residential Institutions) or C3 (Dwellinghouse) of the Use Classes Order, consideration could, for example, be given to the level of care and scale of communal facilities provided.'*
- 3.16. **An Inspired village has a high level of care available and significant amount of communal facilities on-site meaning it is clearly a C2 use.** This has been established in a number of planning decisions in various local authorities including Reigate & Banstead; Wealden District; Maidstone Borough; Bedford Borough; Central Bedfordshire; South Oxfordshire; Horsham District Council; and others.

Definitions of care

- 3.17. A definition of 'care' is provided in the interpretation section (Section 2) of the Use Classes Order, as follows:

"care" means personal care for people in need of such care by reason of old age, disablement, past or present dependence on alcohol or drugs or past or present mental disorder, and in class C2 also includes the personal care of children and medical care and treatment."

- 3.18. The 1987 Use Classes Order pre-dates the formal definition of the term 'personal care' in the health legislation. For the avoidance of doubt, the term 'personal Care' is now defined in the health and social care legislation, regulations and guidance, having been introduced in 2008; however, the reference to 'personal care' in the definition of care provided in the Use Classes Order is not synonymous with the health legislation definition, which did not exist at the time it was written. The definition in the Use Classes Order can only be taken in its practical sense, as described, i.e. 'individual' care to a person in need of care.
- 3.19. The different approach by different local authorities has led to different operational restrictions/obligations being secured at different sites that essentially constitute very similar development, not helped by a Use Classes Order which is now of some considerable age. This is understandably difficult to manage and unpredictable for developers of this type of development.
- 3.20. To support delivery, we strongly encourage the LPA adopts policies which allow for the specific circumstances of the proposal to be assessed in each case, rather than seeking to pre-determine use class based on a particular characteristic; and to be clear that affordable housing policies designed to apply to unrestricted C3 residential does not apply to C2 extra care. Where there is doubt, policies should provide sufficient flexibility for specific circumstances (e.g. viability) to be assessed through a planning application, unless specialist housing for older people had been fully considered at the plan-making stage (infrastructure, relevant policies and local and national standards, cost implications of Community Infrastructure Levy (CIL) and Section 106.¹⁶

4. Evidence base and approach for local plan-making

National planning policy context

- 4.1. The NPPF stresses the importance that the needs of groups with specific housing requirements are addressed, with paragraph 62 stating *‘the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies’*, including for older people.
- 4.2. The PPG (Housing for older and disabled people) (2019) identifies the evidence that plan-makers should consider when assessing the housing needs of older people; in terms of census data, projections of population and households by age group, together with the future need for specialist accommodation for older people broken down by tenure and type (e.g. sheltered housing, extra care)¹⁷. This can be assessed from online tool kits provided by the sector, and evidence prepared by health and well-being boards together with comparisons with other local authorities.

“The need to provide housing for older people is critical¹⁸”

- 4.3. With specific regard to planning and the supply of specialist housing for older people, the PPG sets out the following guidance for local planning authorities:
 - a. Set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the LPA will consider proposals for the different types of housing that these groups are likely to require.
 - b. Can provide indicative figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period.¹⁹
 - c. Include the provision of housing for older people for monitoring progress when preparing the Authority Monitoring Report.²⁰
 - d. Plans need to provide for specialist housing for older people where a need exists. Innovative and diverse housing models will need to be considered where appropriate. Plan-makers need to consider the size, location and quality of dwellings needed to allow them to live independently and safely in their own home for as long as possible, or to move to more suitable accommodation if they so wish.²¹
 - e. Allocating sites can provide greater certainty for developers and encourage the provision of sites in suitable locations, which may be appropriate where there is an identified unmet need. Location is a key consideration with factors including proximity to good public transport, local amenities, health services and town centres.²²

¹⁷ NPPG Paragraph: 004 Reference ID: 63-004-20190626

¹⁸ NPPG Paragraph 001 Reference ID: 63-001-20190626

¹⁹ NPPG Paragraph: 006 Reference ID: 63-006-20190626

²⁰ NPPG Paragraph: 007 Reference ID: 63-007-20190626

²¹ NPPG Paragraph: 012 Reference ID: 63-012-20190626

²² NPPG Paragraph: 013 Reference ID: 63-013-20190626

Recommendation Four:

The local plan should **set indicative figures or a range for the number of specialist housing for older people needed across the plan area and throughout the plan period and this must recognise the diverse models that exist.**

Recommendation Five:

The local planning authority must **monitor the delivery of specialist housing for older people and deliver action plans to address under provision.**

Recommendation Six:

The local plan should consider the **inclusion of specialist housing for older people within appropriate strategic or other site allocations** subject to consideration of need, site and locational factors and deliverability.

Evidence base and methods

- 4.4. The typical average age of entry to private extra care is 80 to 82 years, with an age range of 70 to 90 years forming the bulk of residents. Typically, single females occupy 65–70% of units, couples 20–25%, and single males 10%.²³ As such, it is important to assess the relative age profile of a catchment market to establish the size of the population matching this demographic, both in relative and absolute terms.
- 4.5. Older people will make a choice whether to move into extra care and to own or rent their property. This means the choice can be a large financial decision, often coinciding with a need to leave the larger family home, as well as an emotional decision, perhaps following the death of a spouse/partner or health related issues.
- 4.6. The key demographic profile is where the decision maker of any property buying decision, meets the following criteria:
- 65+ years – we know from empirical evidence that the average age of those entering private extra care is 80+ years of age, and typically those entering retirement housing is 70+ years. The key demographic is the 65+ year age group.

²³ Carterwood Focus, Issue 13 (2014) Extra care housing – where do residents come from?

- Owns their property outright – therefore, has the required equity in their own property to form the means of being able to make a private property purchase or rental decision.
- 4.7. **It is important the evidence base properly assesses supply and demand, given the substantial increase in the elderly demographic, the high proportion of home ownership for those aged 65+ and the rapidly increasing cost of caring for the elderly population.** The growth in the elderly demographic is not considered the best way of predicting demand for particular types of elderly care and accommodation, as traditional residential care homes make way for new forms of accommodation and care.
- 4.8. By considering older people’s preferences should they need care, the Housing LIN advises that although over 60% of people wish to remain in their home, this decision may be limited by a lack of choice of alternative housing, rather than preference. Often a choice is made based on what is available with a decision being made following a crisis event, when need is greatest.
- 4.9. Kerslake and Stilwell²⁴ estimated about one-third of the population entering a care home ‘*could have moved to a form of housing with care as a viable alternative, with a further third who could have managed in such housing had they moved at some time earlier in their care history*’. Other models for estimating demand for supported housing and housing markets and independence in old age include Ball and which endorses the approach that Councils should shift away from care home provision in favour of specialist housing for older people.²⁵
- 4.10. LaingBuisson’s ‘*Extra Care Housing UK Market Report*’²⁶ does not provide a tool for assessing demand, but instead refers to the demographic factors that are likely to influence demand, as follows:
- An expansion of the older population;
 - A reduction in the pool of young adults available for training as nurses or care assistants to work in the community or care homes;
 - An increase in the number of middle-aged people looking after children and a parent;
 - An increase in the proportion of older people with a living child;
 - Changes in the health and dependency levels of older people; and
 - Changes in the patterns of immigration by potential care workers and emigration by trained care staff.
- 4.11. LaingBuisson’s Age Standardised Demand (ASD) rates for care home beds shows a trend whereby demand for residential care beds has reduced as alternatives to residential care are developed. This provides benefits to stretched adult social care service budgets.
- 4.12. The use of comparative evidence and indicators from a variety of sources is a useful method to ascertain the indicative level of need for extra care in a particular local authority area. Other accommodation options in addition to IRC’s will continue to remain open, including remaining

²⁴ Kerslake, A and Stilwell, P (2004) What makes older people choose residential care, and are there alternatives? Housing Care and Support

²⁵ Ball, M (2011). Housing Markets and independence in old age: expanding the opportunities. Henley, University of Reading

²⁶ LaingBuisson (2015) Extra Care Housing UK Market Report, Thirteenth Edition

in their own homes, moving to retirement housing, a care home or to another informal care setting. It is essential the local authority has a full understanding of the various forms of care and accommodation, knowledge of schemes and their availability, and input from a range of sources to determine appropriate indicative levels of need over the plan period (including existing shortfalls).

4.13. The methods of determining demand in a given area reveal a clear message; that there is a strong and increasing demand for new forms of care and accommodation as an alternative to traditional residential care, alongside an increased requirement for nursing and dementia care homes for those with the highest care needs. The difficulty in trying to accurately assess demand for extra care housing is that, due to the relatively new nature of the product, there is no position of over-supply upon which to assess a position of balance. Essentially, the additional supply creates 'demand' when it is developed.

4.14. The government's response to the 'Inquiry into Housing for Older People' (2019),²⁷ included the following points and which the local authority should consider in their plan preparation:

- *'We have a rapidly ageing population. The needs of older people are now different from previous generations and their aspirations around housing and lifestyles have changed dramatically.'*
- *Offering older people a better choice of accommodation can help them to live independently for longer, improve their quality of life and free up more family homes for other buyers.*
- *We recognise that the integration of housing with health and social care services is a vital part of ensuring that people are able to live healthier, more independent lives for longer.*
- *We agree that more older owner-occupiers, living in low value housing, should have the opportunity to move to more appropriate housing as they age. At present, new commercial specialist older people's housing tends not to cater for this market while new supported housing is largely targeted at the most vulnerable. We are keen to encourage innovative approaches, especially from local authorities and housing associations.*
- *More of all types of housing for older people – extra care, sheltered and accessible housing – need to be built across the social and private sectors.*
- *Older people moving home in later life could be part of the solution to tackling the housing shortage but there is little evidence to support this. We agree that further research into the impact of older people moving home on the housing market could contribute to a stronger evidence base to inform policy making.*
- *It is important that providers use clear terminology (with regard to the different types of specialist housing), so that people can make informed choices.'*

“There is a strong and increasing demand for new forms of care and accommodation as an alternative to traditional residential care.”

²⁷ Government response to the second report of 2017-2019 of the Housing, Communities and Local Government Select Committee Inquiry into housing for older people. (September 2018)

- 4.15. The government's Social Care White Paper *'Caring for our Future'*,²⁸ committed to provide support to help local authorities develop their market capacity to provide greater choice for users and drive up quality in care services. The Developing Care Markets for Quality and Choice programme, launched by the Department of Health in 2012, was intended to support local authorities to improve capacity through preparing or improving their Market Position Statements.
- 4.16. The *'Top of the Ladder'* report by Demos,²⁹ the leading cross-party think tank, provided some key findings:
- *'Retirement properties make up just 2% of the UK housing stock, or 533,000 homes, with just over 100,000 to buy. One in four (25%) over-60s would be interested in buying a retirement property – equating to 3.5 million people nationally.'*
 - *'More than half (58%) of people over 60 were interested in moving. More than half (57%) of those interested in moving wanted to downsize by at least one bedroom, rising to 76% among older people currently occupying three, four and five-bedroom homes.'*
 - *'If just half of the 58% of over-60s interested in moving (downsizing and otherwise) were able to move, this would release around £356 billion worth of (mainly family-sized) property – with nearly half being three-bedroom and 20% being four-bedroom homes.'*
- 4.17. The report suggested a number of national policy recommendations to assist in overcoming these problems:
- *'Giving retirement housing special planning status akin to affordable housing, given its clear and demonstrable social value.'*
 - *'Tackling S106 and community infrastructure levy (CIL) planning charges, which make many developments untenable and affect them disproportionately compared with general needs housing developments'.*
 - *'Quotas and incentives for reserving land for retirement housing, and linking this to joint strategic needs assessment and health and well-being strategies for local areas.'*
- 4.18. Inspired Villages recommends clear policies in development plans to support new IRC's / extra care schemes. The evidence is clear, as are the benefits to support the approach and deliver much-needed specialist accommodation for older people.

“One in four (25%) over-60s would be interested in buying a retirement property.”

²⁸ HM Government (2012) *Caring for our future: reforming care and support*

²⁹ Wood, C (2013). *The Top of the Ladder*. Demos

5. Local Authority Plan Making

- 5.1 Many local authorities are increasingly aware of the variety of accommodation and care options available to enable older people to receive care in their own homes, and as a more cost-effective alternative to residential care. In certain areas, they are considering the potential for the reconfiguration of dated and under-used sheltered housing stock to provide additional, affordable extra care housing.
- 5.2 In reality, upgrading sheltered housing to extra care suitable for those with increasing care needs is rarely the most efficient solution, as existing developments are often too small to enable the required economies of scale to deliver 24-hour on-site care, nor are they able to provide the layout and additional communal facilities necessary to form a genuine extra care community.
- 5.3 The Housing LIN considers that the later living market needs to be made both acceptable and financially viable to enable older people to move from unsuitable accommodation (too large to manage, costly to maintain, poorly located or ill-equipped to deal with changing needs) to better, thoughtfully designed homes in sought-after places. Right-sizing does not mean a compromise on design and new homes that are accessible and adaptable and can meet with the current and future lifestyle goals of potential residents.
- 5.4 **There is a strong preference for older people to remain independent for as long as possible, and extra care housing appeals to this desire – it provides their own home, their own front door but within a communal setting with the flexible provision of care on site to adapt to their changing needs.** The key issues leading people to move into extra care are health and care requirements, frequently prompted by the death of a spouse or partner. The decision to move is often strongly influenced by immediate relatives, and the more frail or vulnerable the elderly person, the more this applies. Aspects such as accessibility and convenience for visiting play a major role in decision-making.
- 5.5 An estimated six million people provide significant support to elderly relatives, neighbours and friends across the UK. This factor contributes additional demand, as carers understand the benefits associated with their charges moving to an environment where some of the care burden can be shared, allowing them to remain, sometimes indefinitely, outside of the care home environment. Additionally, the family is often involved in a decision to move a loved one into extra care, located more conveniently, so that regular visits are more easily made and concerns over ‘welfare at a distance’ can be eliminated.
- 5.6 In 2019, ARCO partnered with ProMatura to conduct the biggest ever study of retirement communities, 30 with surveys of residents representing 81 communities³⁰ and 15 different care operators, which provided evidence of the huge health, wellbeing and security benefits for residents.

³⁰ ARCO with research by ProMatura International (2019) Housing, Health and Care. The health and wellbeing benefits of Retirement Communities

- 5.7 The main reasons given for moving to an IRC were cited as: less need for property maintenance, access to communal facilities, and the availability of 24-hour support and domiciliary care on site. The benefits of living in extra care included: being more active and healthier for longer, the ability to enjoy life, having greater control, and feeling safe and secure with a consequent reduction in loneliness.
- 5.8 The resultant recommendations for action set out, amongst others, that the government and local authorities should:
- *‘Develop a legal and regulatory framework for Retirement Communities to bring the UK into line with leading countries around the world*
 - *Develop a clear definition and terminology for Retirement Communities and recognise the significant contribution they are making to our health and social care systems*
 - *Provide more funding and land for affordable housing in Retirement Communities*
 - *Undertake further research on the level of Retirement Community supply and demand in their areas*
 - *Ensure they have provisions in their local plans for Retirement Community housing*
 - *Partner with specialist Housing Associations with expertise in extra care Retirement Communities to increase provision.’*
- 5.9 Tailored housing that is accessible, well designed and well located to facilities (particularly those on-site) may reinvigorate a person’s social life through their offer of a wide range of activities and communal areas that provide opportunities for making new friends. There is evidence that residents have better health outcomes than older people living elsewhere; designs that minimise the risk of falling, for example, and social activities that reduces loneliness and isolation.
- 5.10 By providing an attractive alternative type of accommodation in the form of extra care housing, older homeowners may benefit from releasing equity from their existing properties, which they can use to fund their retirement years. Extra care can also contribute to addressing wider housing market concern, by releasing their homes onto the market for families.
- 5.11 There are other benefits in promoting extra care as they can reduce the demand upon health and social care. Research from Aston Research Centre³¹ in 2015 set out that the NHS saved more than £1,000 per year on each resident living in Extra Care Charitable Trust’s schemes between 2012 and 2015. The Homes for Later Living *‘Healthier and Happier’* report³² suggests that each person living in older people’s housing contributes to a fiscal saving to the NHS and social care of approximately £3,500 per annum. Inspired Villages typical model providing 150 units would generate a population of approximately 195 residents (average occupancy 1.3 persons per unit) **resulting in savings of £680,000 to the NHS and social care every year**. This is a significant benefit and widely acknowledged as such in Section 73 planning appeals.

³¹ Holland, C (2015) Collaborative Research between Aston Research Centre for Healthy Ageing (ARCHA) and the ExtraCare Charitable Trust

³² WPI Strategy for Homes for Later Living (2019) *Healthier and Happier*; An analysis of the fiscal and wellbeing benefits of building more homes for later living

Recommendation Seven:

The local plan and its evidence base must recognise the significant benefits associated with specialist housing for older people and this can inform planning decision making.

- 5.12 As an operator, unlike C3 residential developers, Inspired Villages considers the long-term ownership and management of the site. Therefore, it is vital that we secure suitable sites and planning permissions which enables the implementation of a viable development. It is often very difficult for an operator, such as Inspired Villages to secure sites on the open market due to competition from residential developers who do not provide the level of facilities or care that an IRC does.
- 5.13 The inclusion of positive policies to support extra care could give landowners an incentive to proceed with this type of development over a C3 residential developer and can be justified on the basis that extra care developments are relatively self-contained because of the extensive communal facilities on-site (which are also publicly accessible); lower traffic generation as trips are predominantly off-peak; are employment generators; and can result in savings to the NHS and adult social care. All of which are significant benefits.
- 5.14 We recommend the LPA properly engages with the extra care sector regarding the potential for including this form of development in site allocations to ensure this would be deliverable and an appropriate site location. The sector is an emerging market and operators do not tend to have strategic land, meaning they may not be able to promote potential sites at the time the local plan is being prepared.
- 5.15 To avoid being prejudiced, LPAs should consider whether policies allow for a greater degree of flexibility for proposals for specialist housing for older people on land that may otherwise be inappropriate for standard residential development, for example, adjacent to settlement boundaries where those settlements provide a certain level of services and facilities. Such a policy approach has been applied in authorities, such as Hart District, South Northamptonshire and Horsham District (see examples at back of document.)

Recommendation Eight:

The local plan should **set out different policy requirements**, for example, affordable housing, **for specialist housing for older people (C2 use) compared to residential development** within the C3 use class and the evidence base, viability must be taken into account the different circumstances between the uses (e.g. integrated retirement communities/extra care provide significant levels of communal facilities - non saleable floorspace - and their ongoing maintenance and management, staffing, funding, etc). Where there is doubt, policies should provide sufficient flexibility for specific circumstances, which may include viability, to be assessed through a planning application.

- 5.16 Inspired Villages recognises that some LPA's have specifically considered the need for policies to be adopted to support the delivery of affordable extra care type housing, principally derived by County Council's Market Position Statements endorsing this tenure because this is the tenure which they are responsible for commissioning. Inspired Villages is concerned to ensure planning policy also gives sufficient policy support for the full range of specialist housing provision to serve older people, including private extra care/IRC's, as set out in the definitions of specialist housing in the PPG.
- 5.17 The need identified for both affordable and private tenures must be recognised, and LPAs have a duty to plan for the delivery of development to meet all housing needs. The 'critical need' has been identified in the PPG and the requirement to ensure sufficient land is available to address housing requirements of groups with specific needs and incorporate policies that deliver housing for all is identified at paragraphs 59 and 61 of the NPPF. Private extra care is one of the options, along with care homes, affordable extra care, and private and affordable sheltered housing, that will cumulatively contribute towards addressing the need and having provided choice.
- 5.18 In addition to responding to this duty, planning policies that support the delivery of specialist housing for all older people, regardless of financial means, is of significant benefit to social care and NHS funding. This is because individuals who plan for their future by using their own private financial means to secure accommodation in a setting that supports their health and wellbeing, without or before the need to call on the NHS and social care, will significantly reduce their need to draw on these socially funded services. Prevention of health issues is vital to the resilience of the NHS and social care services. LPAs should not underestimate the beneficial effect that supporting development proposals that facilitate people to fund and plan for their own health and wellbeing.
- 5.19 We therefore strongly encourage the LPA to produce policy, which supports the delivery of specialist housing to meet the needs of older people in line with the requirements of the NPPF

and the PPG which states *“where there is an identified unmet need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need.”*³³

Rectory Homes Judgement

Rectory Homes Ltd sought permission for ‘the erection of a ‘Housing with Care’ development (use class C2) for 78 open market extra care dwellings and a communal residents centre’ in Thame, South Oxfordshire. Both the applicant and the local planning authority agreed that the proposed use fell within use class C2, but there were differing opinions as to whether an affordable housing contribution was required.

The question to be determined by the Court was whether the proposed C2 units were ‘dwellings’ for the purpose of the development plan policy. The Court concluded that units of accommodation that allow for independent living comprise dwellings despite falling within use class C2 meaning that an extra care development may be caught by a widely drafted policy requirement to provide affordable housing.

Consequently, the decision has the potential to cause significant difficulties for the sector, resulting in an increased reliance on viability assessments, resulting in further cost and uncertainty in the planning process. This has the potential to disincentivise delivery of a much-needed form of specialist accommodation in circumstances where providers are already at a disadvantage against traditional residential developers due to the inherent costs within a retirement community development.

It is important that the drafting of affordable housing is precisely worded to reflect its applicability to C3 residential dwellings, particularly where the Council’s evidence base viability work has not assessed retirement communities.

³³ NPPG Paragraph: 016 Reference ID: 63-016-20190626

Examples of other local authorities taking a positive policy approach

Hart Local (Plan Strategy and Sites) 2032 (adopted 30 April 2020):

Policy H4 - Specialist and supported accommodation (as per main modifications)

Proposals for specialist and supported accommodation that meets the needs of older persons or others requiring specialist care will be permitted:

- a) on sites within settlement boundaries; and
- b) on sites in the countryside provided:
 - i. there is a demonstrated need for the development; and
 - ii. there are no available and viable alternatives within settlement boundaries; and
 - iii. the site is well related to an existing settlement with appropriate access to services and facilities either on or off site.

South Northamptonshire Part 2 local plan (adopted 22 July 2020):

Policy LH6 - Specialist housing and accommodation needs

1. Proposals to meet older persons / specialist housing needs for two or more dwellings will be supported on suitable sites that are within the settlement confines subject to the following criteria:
 - a) The location is well served by public transport or within walking distance of community facilities (within 400m) such as shops, medical services, public open space, and social networks appropriate to the needs of the intended occupiers, or where this is not the case, such facilities are provided on site; and
 - b) The scale, form and design of the development is appropriate to the client group and in relation to the settlement where it is located; and
 - c) Highway, parking and servicing arrangements are satisfactorily addressed; and
 - d) Gardens and amenity space are provided and are of an appropriate size and quality.

Proposals for older persons / specialist housing on suitable sites immediately adjacent to the settlement confines of Rural Service Centres and Primary Service and Secondary Villages (A) should meet all of criteria (a) to (d) above and:

- e) The scale of development should be clearly justified by evidence of need in the district; and
 - f) Evidence is provided which demonstrates that there are no alternative suitable available sites within the adjacent confines.
2. Proposals for specialist housing and accommodation to meet clearly evidenced needs arising from outside the district will be considered where they relate to suitable sites that are within or immediately adjacent to the confines of the Rural Services Centres.

Horsham District Planning Framework (November 2015)

Policy 18 Retirement Housing and Specialist Care

3. Proposals for development which provide retirement housing and specialist care housing will be encouraged and supported where it is accessible by foot or public transport to local shops, services, community facilities and the wider public transport network. The Council will particularly encourage schemes that meet identified local needs for those on lower incomes and provide affordable accommodation for rent or shared ownership / equity.
4. Large scale 'continuing care retirement communities' will be supported in appropriate locations, normally within defined built-up areas, where they can be justified in terms of meeting identified need, and:
 - a) Provide accommodation for a full range of needs, including care provision separate from the self-contained accommodation;
 - b) Include 'affordable' provision to meet identified local needs, or where this is not possible, provide an appropriate commuted sum in lieu of on-site units; and
 - c) Include appropriate services and facilities, including transport, to meet the needs of residents / staff and which contribute to the wider economy.

Vale of Aylesbury District Council Local Plan 2013-2033 (adopted 15 September 2021)

Policy H6b Housing for older people – in addition to identifying eight site allocations and four broad locations for the provision of C2 accommodation, also proposes:

3. Proposals for C2 older people accommodation will be granted permission provided the following criteria are met:
 - a) The proposal is in a sustainable location for amenities and services
 - b) There is an identified package of care provision on site
 - c) Minimum Clinical Commissioning Group inspected space standards are met or exceeded
 - d) Facilitates social and recreational activity are provided
 - e) Guest accommodation is provided (unless the proposal is for Extra Care Sheltered Accommodation)

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3 Issues Affecting Viability

- 3.1 There are a number of issues that affect the viability of specialist housing for older people. These can relate to internal factors such as design efficiencies or external factors such as the market and competition with traditional / general needs housing.
- 3.2 In the private sector both retirement housing and retirement community developments predominantly operate on a sales model whereby an individual home comprising part of a managed development is sold to a purchaser by the developer/operator. Care packages (Assisted Living & Extra Care schemes) are separately provided, either by the operator or by a 3rd party care provider, at an additional cost.
- 3.3 Care Homes operate on an investment basis whereby the home is sold or let to an operator with individual residents paying for their room, board and care. Any lease to the operator (whether created by themselves or the developer if separate) is then often sold as an investment. Accordingly the economics are quite distinct from 'for sale' developments of specialist housing for older people. I will limit this statement to the development viability issues affecting the sale of the latter.
- 3.4 I will consider the various issues and comment whether these have been reflected within the viability work undertaken by CW for the local plan viability assessment.

Design Efficiencies

- 3.5 The development and construction of houses is highly efficient as a purchaser is buying the entirety of the built house, including any external storage. Apartment blocks require shared bin stores, lobbies, corridors, stairwells, as well as cycle parking and lifts. These are outside the apartment and thus, within the constraints of a block, reduce its saleable space and in turn the efficiency of the scheme. In most Extra Care communities a proportion and in some cases all of the accommodation will be provided as apartments even in areas where general needs accommodation is generally provided as housing.
- 3.6 As set out in the section above all types of specialist housing for older people incorporate a significant provision of facilities in addition to the individual units themselves and the common parts found in general needs apartment blocks. In some very high value locations, such as Central London, additional on-site facilities (eg swimming pools) will be provided within a general needs development but this is rare.
- 3.7 As a result the 'efficiency' of specialist housing for older people, i.e. the floor spaces of individual units ('net') to the total floor space ('gross'), is significantly poorer than in traditional / general needs housing. The exact efficiency will depend upon the detailed design of each scheme and the number of units within it but in general based upon my own experience of schemes I would expect the following design efficiencies:

Housing Type	Net:Gross Efficiency
Traditional / General Needs Houses	100%
Traditional / General Needs Apartment	85%
Sheltered Living / Retirement Living Apartments	75%
Extra Care Community – Mix of Apartments and Bungalows	70% -75% depending on size and mix.

- 3.8 The Retirement Housing Group Paper attached as Appendix C makes a similar point albeit that the efficiency shown for Extra Care is even poorer in this report at 60-65%.
- 3.9 As one can see developments of specialist housing for older people, in particular Assisted Living / Extra Care, have a significantly lower amount of saleable space compared with traditional developments. The precise efficiency will vary and where houses form part of a development of specialist housing for older people it will improve marginally but cannot achieve the 100% efficiency of traditional housing estates given the facilities provided. Larger Extra Care communities will be more efficient than older apartment schemes and I would therefore expect a more efficient ratio of 75% or even more in some cases reflecting the current trends for larger communities.
- 3.10 As a consequence of the net:gross ratio of developments of specialist housing for older people a comparatively lower total sales revenue for the same amount of built space is achieved making them less viable.
- 3.11 It is not clear what allowances CW have made in this respect and therefore we cannot comment on the validity of their figures in this respect.
- 3.12 In view of this significant provision of additional facilities provided for the residents well-being a retirement village needs to be of a certain quantum to be viable. Current market thinking from clients who I act for in this market is that a minimum village size of circa 150 units is necessary to enable viable delivery of the overall scheme. We will refer to this further throughout this report.

Gross Development Values

- 3.13 Due to the facilities developments of specialist housing for older people include a sales premium (ie a higher sales value) that can be achieved from prospective purchasers who value the benefits this provides. However, to overcome the differences in efficiency set out above, Extra Care schemes would have to achieve a significant premium against general residential apartments and an even greater one against general needs houses to achieve a comparative level with these developments. The premium I have experience in the market is not at the level require to achieve parity mainly because the majority of prospective purchasers will come from the local area and therefore the value of the extra care unit has to reflect the value of the customers current property to ensure it is affordable to them. The level of premium will vary depending on the supply of similar extra care property in an area but in my experience of this market I would expect to see a premium of circa 10% on a £psf/m basis over similar quality new build general needs housing.
- 3.14 In addition to the efficiency of units they are also significantly larger than general needs housing. National Described Space Standards (NDSS) benchmark minimum floor areas for general needs housing at 50sqm for a one bed and 61- 70sqm for a two bedroom unit. In comparison, the extra care accommodation far exceeds these standards in order to provide improved mobility access, storage and flexible living spaces. Apartments within schemes I have worked on recently range in floor area from around 70sqm for a one bed to up to 110sqm plus for the larger two bedroom units. For the extra care bungalows/cottages the floors areas are also generous ranging from circa 110sqm to 140sqm. This means that if the same £/psft/m value is applied to these units as to general housing a significantly higher unit price will result. This can prove a barrier to achieving the higher levels of value required to compete with general needs housing.

- 3.15 It should be noted that CW adopt minimum space standards which even for retirement living properties are likely to be on the low side and means the build costs are likely to be under estimated and the viability over estimated.
- 3.16 Deferred Management Fees (DMF) or Event Fees also need to be considered. The Inspired Villages business model requires those taking a lease to agree that a Fee is paid when their flat is eventually vacated, normally after their death. The charging of such 'event fees' is a feature of the majority of operators in this market and it is therefore correct, in my opinion, to consider for planning viability purposes.
- 3.17 The inspector in the Gondar Gardens Case (Appeal Ref: APP/X5210/W/18/3198746 Gondar Gardens Reservoir, Gondar Gardens, London NW6 1QF) considered the need to include the DMF within the value of the scheme and concluded that an element of the DMF could be reflected in the value of the scheme when deciding how much it could afford towards affordable housing.
- 3.18 Based upon my experience of the market I would suggest that an average fee of up to 10% of the sale price when an occupier decides to sell their home is the market norm. The initial fee on first purchase would be zero but this then increases up to this level usually over the first five years of occupation at circa 2% per annum and after that the occupier would pay the full amount. In the Gondar case the inspector references a report by a firm specialising in finance for healthcare and retirement living (Conaghan Healthcare and Corporate Finance: Retirement Communities and 'Event Fees', June 2016). The report confirms that event fees are becoming commonplace within the 'retirement community' sector and suggests that the majority of these are set at 10% or less.
- 3.19 However only a proportion of this fee can be taken into account in consideration of the GDV of the scheme at the outset as it is designed to cover a number of costs. Extra Care villages require long term investment which will not be covered by the service charge. Service charges may pay for repainting corridors, communal areas, landscaping etc and the sinking fund included within the service charge means that if roof needs replacing, there is money for that. However longer term investment needed to maintain the villages value and attractiveness as a place to live in retirement will be required which cannot be covered by this service charge. For example; at some point in future every car will be electric and will need additional electricity sub-stations and electric charging points installations. This is just one example of the sort of costs retirement villages built in recent decades will face and it cannot be known now what similar challenges will be faced over the term of a long lease and beyond.
- 3.20 Many operators also carry out a complete refurbishment of a property once it becomes vacant and prior to re sale to ensure values within the estate are maximised. Currently the average cost of this to Inspired Villages is circa £12,000 per unit. The communal services which have to be provided upfront are a considerable cost to the development in terms of both the provision and the interest thereon until units can be sold. This is not covered by the sale price of the properties and the DMF helps to pay towards these and thus only an element of the fee can be reflected in the GDV value. The operation of the amenities and services within retirement villages are not materially profit-making, being either based on a cost-recovery service charge model or a management fee model with minimal profitability. Given the operational risks associated, which are far in excess of those for a standard portfolio of managed rental accommodation, an additional role of the DMF is to offset this risk which would otherwise be commercially insupportable.
- 3.21 As yet there is no common market practice which can be referred to in valuing the DMF and RICS guidance with regard to viability assessments makes it clear that benefits or disbenefits

unique to the applicant should be disregarded other than in exceptional circumstances. Whatever we add in has to be appropriate to the market as a whole and also has to be in line with the evidence from which the base value for the unit is drawn.

- 3.22 I have created our own model in order to arrive at the value of the DMF. This considers:
- Scheme Build out and the average length of time to maturity for villages
 - The average length of tenancies at villages
 - Growth in market value
 - The discount rate applicable
 - The level of reinvestment required
- 3.23 Based on the above our model suggest that the addition to the base market value of properties will be in the order of 5%. In terms of carrying out viability testing for plan making purposes I would suggest that it would be prudent to allow no more than a 5% addition to reflect the potential for DMF. In the case of the scheme assumptions on site KN2 I have calculated an addition of 5.2% further details of which are included within the scheme viability assessment included within Appendix D.
- 3.24 CW do not consider DMF however the prevalence of these within the retirement living sector is less and therefore this is not necessarily an oversight but rather reflective of the typology they have considered.

Construction Costs

- 3.25 Notwithstanding the need to build a larger scheme to achieve the same sales space, developments of specialist housing for older people are more expensive to construct than general residential housing. Firstly any flatted development is more expensive to construct due to the proportionally higher costs of a larger structure, noise insulation, incorporating car, cycle and bin storage (which often cannot be put into a separate, cheaper structure), and higher proportion of bathrooms and kitchens which cost more to fit out. Secondly, developments of specialist housing for older people cost more to construct compared to general needs developments as they will often include a significant number of lifts (even if only two storey), specially adapted bathrooms, fitted out treatment rooms and other specialist items such as underfloor movement sensors etc.
- 3.26 For Local plan and CIL viability work local authority advisors will often rely on average price reports from the Building Cost Information Service (BCIS) provided by the RICS. This is the case with the CW report in respect of the housing element although it is not clear where the cost used for the Retirement Living scheme comes from albeit these are higher and at £1,453 per square meter (psm.) sit slightly above the median BCIS costs for 2 storey supported housing. We attach as Appendix E the BCIS costs for the West Midlands as CW have used within their report.
- 3.27 It should be noted that the BCIS Costs for 'Supported Housing' include homes for those with learning difficulties which do not require the same level of care facilities. Likewise BCIS do not provide a separate cost for Sheltered / Retirement Living developments in comparison to Assisted Living / Extra Care which require additional expensive facilities. Finally there are very few retirement villages which have been built out and will factor in to the BCIS cost information.

Accordingly the cost differential compared to residential housing is likely to be larger for Extra Care developments than reported.

- 3.28 For this reason I would always suggest that when considering Extra Care viability practitioners should adopt the upper quartile of the BCIS costs and compare this with the median quartile for good quality general needs housing. The rates shown for the West Midlands are £1,943 psm for 2 storey housing, approximately 50% higher than Flats at £1,295 psm and 68% higher than 'Estate' housing at only £1,157 psm.
- 3.29 I would note that even at these levels in our experience the costs for Extra Care villages can often be higher.
- 3.30 BCIS costs do not account for external works such as service connections or landscaping which is proportionally higher for housing estates. In my experience I would apply approximately 10% of costs for external works to apartment led developments (whether developments of specialist housing for older people or for general needs) and 15% for housing led schemes. Extra Care schemes have very high levels of design quality and significant open space as this is part of what the community will be buying into. Based upon my experience to date external works costs of 15-20% of the base cost are appropriate for Extra Care village schemes.

These higher construction costs are compounded by the aforementioned reduced efficiency of developments of specialist housing for older people. The increased costs are shown below across a range of housing types:

	Housing Estates	Residential Flats	Retirement Living	Extra Care Village
Net Sales Area	100	100	100	100
Efficiency	100%	85%	75%	75%
Gross Internal Area	100	118	133	133
BCIS £/psm Costs	£1,157	£1,295	£1,424	£1,943
Plus External @	15%	10%	10%	15%
Total £/psm Costs	£1,331	£1,425	£1,566	£2,234
Total Costs	£133,055	£167,588	£208,853	£297,927
Difference to Housing	0%	26%	57%	124%

- 3.31 In order to back up the levels suggested above for Extra Care the following are details of a number of sites which one of our Extra Care developer clients has built out within the last 18 months. These figures are inclusive of external works and it will be noted that the average exceeds the above figure:

	No of Apts	Location	£per m2
Project 2	51	Surrey	2,329
Project 3	80	Berkshire	2,168
Project 4	53	Surrey	2,249

- 3.32 My client also has a number of projects recently tendered or currently on site the base build costs excluding external works for which may be compared with the BCIS rates and are as follows:

	No of Apts	Location	£per m2
Project 1	39	Cheshire	2,107
Project2	54	Kent	2,098
Project 3	76	Bedfordshire	1,902

- 3.33 My client has a further project which has recently been tendered. The contract is in the process of being awarded with the winning contractor having bid at a base build cost equating to £2,175 psm. The average of the above scheme build cost excluding external works is in the order of £2,070 psm.
- 3.34 The most recent viability assessment we have concluded have included a build costs from QS responsible for the scheme which have equated to £2,260 psm (£210 psf) as a base build cost prior to additions for external works , utilities and other additions which will general include a ground source heat pump solution for the heating element and other sustainability related items such as electric car charging points etc.
- 3.35 Reflecting all of the above for testing purposes we will adopt £2,045 psm (£190psf) plus 15% for external works and an allowance of £20,000 per unit in respect of strategic site infrastructure which is in line with the amounts included within the CW viability work.
- 3.36 Finally, many of the house builders (i.e. the larger well known companies such as Barratts, Redrow, Crest Nicholson etc), as the name suggests, build their houses themselves through their own construction arm. Conversely most developers of specialist housing for older people do not have the scale that enables them to employ their own in-house team and they must appoint a third party contractor. As a result the house builders are able to secure more competitive construction rates in comparison to the figures reported by the BCIS.

Professional Fees

- 3.37 In addition to the cost of building any scheme professional fees will need to be expended designing, securing planning and undertaking technical work. Housing estates are often designed around an existing set of plans based upon a house builder's product types; such that anyone can see the same home at many different sites. Accordingly fees only need be expended to place these designs within the specific site's setting and make any adjustments for local materials or the planning conditions. In their local plan assessment CW adopt 8% which I would suggest is fair.
- 3.38 The majority of Extra Care schemes include an element of apartments and any apartment development is ultimately a bespoke product requiring it to be individually designed by Architects with appropriate input from allied professionals (Quantity Surveyors, Planners, Environmental Consultancy, Mechanical & Electrical Engineers, Structural Engineers etc) which increases its cost.
- 3.39 In addition the design of Specialist housing for older people and particularly Assisted living/Extra Care has to be high to try and recoup some of the additional build costs by way of improved sale values.
- 3.40 Developments of specialist housing for older people will therefore require a greater level of professional input than a general needs housing scheme in order to ensure the scheme meets the specific needs of its intended occupants as well as the need to design the additional facilities that these schemes have. For this reason it is my opinion that the rate adopted for Extra Care schemes should be higher than that which is adopted for general needs schemes.

- 3.41 In the majority of local plan viability assessments we see Professional Fees set at circa 9-10% for General Needs residential and therefore I am of the opinion that a minimum rate of 10% for plan viability testing is appropriate for Extra Care schemes and that this should always be higher than the rate used for the General Needs housing tests. We note that CW adopt 10% in relation to the Retirement living scheme which believe to be fair related to the level adopted for general needs housing.

Construction Rates

- 3.42 Because of its design any apartment block must be fully constructed before the sale of a single unit can be completed. As a result the capital cost of the block must be financed in its entirety. Developments of specialist housing for older people, in particular Extra Care schemes, with their additional construction costs and facilities (which must be completed in time for the first occupation) therefore entail a greater funding burden.
- 3.43 In both cases this will result in all of the units within a block coming onto the market at the same time increasing the supply versus the static demand and thereby having a negative effect on values. Clearly a mix of housing and flats will improve matters however it is still the case that buyers for this type of product prefer to see the end product and are far less likely to buy off plan.
- 3.44 Conversely a housing estate can be built out on a rolling basis such that a small number of homes are started at any one time before moving onto the next set. This results in the sales of the completed houses funding the construction of the next set and so forth thus reducing the financing cost of the project significantly. This also has the effect of restricting the supply of homes on the market at any one time.
- 3.45 Furthermore, this rolling construction programme can be adjusted to meet market expectations (if sales rates slow the construction rate can be reduced) whereas apartments must be completed in their entirety. As a result general house building is fundamentally a less risky venture which is reflected in finance costs and profit expectations.
- 3.46 In the scheme we expect to see come forward at KN2 the development will be split into three phases with three separate build contracts being awarded. Each phase will be completed prior to sales commencing in order that purchasers can see the entirety of what they are buying into. This model is common to the way in which other retirement operators I work with build out their schemes.

Start Up Costs / Empty Property Costs

- 3.47 As the facilities within a development of specialist housing for older people assist in residents well-being, in the case of Assisted Living / Extra Care, their day to day care needs must be fully operational before the scheme can be occupied.
- 3.48 Once completed any facilities within a development will need their operational costs covering. This is achieved through a service charge paid by residents. However, the amount chargeable to any one owner is only proportionate to the development at full occupation. Accordingly the developer has to cover the cost of any unsold units which is significant particularly at the outset of the sales programme. CW recognise this cost in their work in appraising the retirement living scheme allowing £3,324 per annum for 1 bed units and £4,680 for two bed units. It should however be noted that in view of the extra facilities service charges

at Extra Care Villages are significantly higher usually falling between £8,000 and £10,000 per unit per annum.

- 3.49 In addition to the service charge, as units have to be completed to encourage purchasers the developer will have a Council Tax liability for the sales period which again is likely to be considerable given the sales period. Given the large units of high value this is a significant sum.
- 3.50 As most general needs residential schemes do not have additional facilities developers of such schemes do not face this cost burden. Even where schemes do include additional facilities (such as swimming pools) their operational start can be delayed until a certain level of occupation is achieved. Furthermore, due to the differences in the market, the sales rates of general needs housing is faster and thus any Empty Property Costs are further reduced.
- 3.51 These additional costs have an added impact on the finance costs for the scheme.

Sales Rates

- 3.52 By their nature, developments of specialist housing for older people are limited to those over the age of 55 or indeed often older – 65+ in the case of my clients schemes. As a result this significantly limits the market for potential purchasers in comparison to general needs housing which carries no age restrictions whatsoever. Considering moving away from the family home is a sizeable decision and because of a prospective purchaser's age and care needs, any sale is likely to involve additional family members, predominately their children, who will also need convincing that a property provides the best place for their parent(s) to live out their remaining years (and as importantly without eroding any inheritance)s. Accordingly, the sales rates of developments of specialist housing for older people are much slower which increases their finance costs and decreases the Internal Rate of Return. Extra Care developments are further impacted as such schemes are limited to purchasers with care needs thus further reducing the market.
- 3.53 In addition given the importance of the decision and often the involvement of the whole family buyers will want to see the finished product and the quality of the community facilities being provided. This means that the facilities must be available prior to sales and that off plan sales are not commonly achieved at such developments. The build out programme for a Retirement Village/Community will ensure that there is a constant supply of finished units but the phases will not overlap. Hence the build of the second and third phases will be timed to complete in line with the sale of the last unit in the previous phase.
- 3.54 In contrast general needs residential schemes are not restricted by age or care requirements and are open to all who can afford them; including the elderly who often resist a move to specialist housing despite their existing homes becoming increasingly inappropriate to their needs. Consequently these developments are able to sell at a much faster rate providing another competitive edge that age and care need restricted developments struggle to match.
- 3.55 CW recognise the difference adopting sales rates of 4 per month for market housing and less than two per month for the retirement living scheme.

Sales & Marketing Costs

- 3.56 A significant cost in any development is the cost of sales. Only the smallest developments can rely solely upon an estate agent to sell the units at an acceptable rate. Most schemes will require a significant degree of marketing including a manned sales office and show home.
- 3.57 The increased sales period faced by developments of specialist housing for older people means that the sales office has to be manned for longer which increases its cost relative to general needs housing. Furthermore, in order to secure the support of family members, additional time will need to be spent with each family which also increases costs. Additionally less mobile purchasers will be met at their home further increasing the time and expense required to sell each unit relative to general needs housing developments.
- 3.58 On average a typical market housing scheme might cost circa 3% of the developed value to sell compared to 5% -6% for a development of specialist housing for older people.
- 3.59 CW recognise this in their work adopting 3,5% plus £500 per unit legal fees for market units and a total of 6% for the retirement living scheme.

Risk Return / Profit

- 3.60 Profit is widely considered as an output of any development which is collected at the point a scheme is completed. However, when deliberating what can be paid when bidding for a site a developer will have to consider their profit requirement. Once this (together with the costs of construction, professional fees, finance etc) is deducted from the expected revenue (i.e. sales values) the residual is the amount that can be paid for a site. This is known as the Residual valuation method.
- 3.61 Any profit requirement that a developer seeks is carefully balanced between the need to secure highly competitive and limited development sites versus the risks of a potential project. As a result of the issues raised above (higher construction costs, slow sales rates etc) funders of developments of specialist housing for older people often require a greater 'hurdle rate' compared to general needs housing.
- 3.62 The governments' Planning Policy Guidance at Paragraph: 018 Reference ID: 10-018-20190509 sets out that "For the purpose of plan making an assumption of 15-20% of gross development value (GDV) may be considered a suitable return to developers in order to establish the viability of plan policies". The level of profit will vary depending on risk with housing estates normally at the bottom of this range, standard flatted developments in the middle and developments of specialist housing for older people or other complex developments (e.g. tower developments) at the top. This further reduces the competitiveness of operators of developments of specialist housing for older people in the market for land.
- 3.63 This need for a difference in profit rates is missed by CW who adopt a profit of 20% for both private housing and retirement living.

Land Value

- 3.64 In line with Planning Policy Guidance I do not consider the price paid for land to be relevant in determining what a scheme can afford to pay towards planning policy requirements

including affordable housing. If a developer has overpaid for land for whatever reason this is not good reason not to make a fair contribution towards planning benefits and if that in turn means the land deal has to be renegotiated then so be it.

- 3.65 Having stated this, the price which developers have to pay for land, when forced to complete with housebuilders in the open market is a concern for the viability of Specialist housing for older people and in particular Extra Care housing as set out in my summary in respect of viability issues below. This is particularly the case where Extra Care operators are required to deliver affordable housing and other planning benefits.
- 3.66 CW are the only consultant to date that we have come across that have recognised the need for retirement developers to compete with the housebuilders. They realise that not only will they have to cover any benchmark value based upon existing use but if the value for policy compliant residential use is higher they will also need to cover this. To reflect this they adopt a residential based alternative use value as the benchmark land value for the retirement living scheme.
- 3.67 This approach will make it clear whether the retirement developer can compete in the market and in situations where retirement sites are not specifically allocated, which is the case in the majority of local authority areas, will ensure viability is considered on an equal footing with the housebuilder. We would highly recommend this approach for both plan making and decision taking viability assessments related to retirement living and Extra Care schemes. We will follow this approach in our consideration of the Extra Care scheme on allocation KN2.

Summary

- 3.68 The impact on viability of the above issues is that ultimately developments of Specialist housing for older people are less able to pay the same price for land as General Needs residential developers. There is a continuum of reducing viability in relation to housing types with Retirement Housing less viable than General Needs housing and Extra Care Retirement Communities/Villages being even less viable than Retirement Housing. Accordingly it is much harder for developers of specialist housing for older people and in particular those seeking to deliver Extra Care to secure sites for development and meet the housing needs they aim to supply.
- 3.69 One of the very few ways the imbalance is redressed, so that developers of specialist housing for older people can compete, is that they have not until recently been required to provide onsite affordable housing. Sheltered / Retirement Housing, generally falling into Use Class C3, may be required to provide a contribution but the viability constraints will be reflected. Given the additional constraints affecting Extra Care schemes, which generally fall within Use Class C2, these to date have not normally been required to make any provision at all. However, the decision in the Rectory Homes case means that local authorities are now more likely to seek both CIL and affordable housing in relation to C2 Extra Care schemes. Imposing this requirement reduces the viability of such projects, thus the amount that can be paid for a site and consequently the ability of Extra Care Developers to compete in the market for sites and the probability that such uses will be delivered.
- 3.70 I believe that it is imperative that Local Authorities fully test the ability of different sectors of the elderly housing market to deliver planning benefits and remain able to compete for sites to ensure planning need is met. This testing must be rigorous and with a full understanding of the economics which relate to this class of property. It should also test against a policy compliant residential land value as CW have done in this case where the authority is relying

on the market to deliver this type of development. If it is not done and Authorities rely on viability assessments at the decision taking point in the planning process it is far less likely that sites will come forward for this use.



Strategic Planning Research Unit
A specialist team within DLP Planning Ltd

For and on behalf of
**Hallam Land Management
Inspired Villages
Limes Developments Limited
Strata Homes (Yorkshire)**

**Sheffield Local Plan
Regulation 19 Consultation**

**Objections to the Local Plan
Objection to the Integrated Impact Assessment Report December, 2022**

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

February 2023



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1.0 OBJECTION TO THE INTEGRATED IMPACT ASSESSMENT REPORT DECEMBER 2022

- 1.1 The IIA demonstrates that it is possible to identify specific sites to meet the minimum housing requirement as set by the Standard Method. As highlighted by our objection to the IIA the approach taken does not allow for the contribution that could be made from smaller non-strategic sites released from the green belt. A site size of 1,000 dwellings was set at the beginning of the assessment. If there was no size criteria this would increase further the selection of sustainable and deliverable sites.
- 1.2 In terms of the IIA it is appropriate to note that this only considered the release of strategic sites from the Green Belt but there is the potential to release smaller sites from the Green Belt which would be no less sustainable in terms of their relationship to services, facilities and public transport routes than some of the employment areas that the Council are encouraging to be redeveloped for housing and certainly have comparable access to services and facilities as the single site selected for release from the Green Belt at Norton Aerodrome.
- 1.3 The inclusion of these smaller sites would increase the choice from which the Council could select suitable and deliverable sites to meet the minimum level of housing need.
- 1.4 In passing it is worth noting that the approach of setting a minimum size of Green Belt site as prerequisite prior to undertaking a Green Belt Review assessment has been previously found unsound by the inspectors at the St Albans Local Plan examination on the basis that suitability and sustainability of a site is not dependent upon its size.
- 1.5 In summary therefore the IIA could have assessed a greater range of Green Belt sites as limiting the assessment to 1,000 dwellings is unsound as smaller sites maybe be just if not more sustainable. The implications of this is that there is we would argue that a wider range of potential Green Belt sites that could be released without causing high harm to the Green Belt function in order to meet the minimum level of housing need and this would represent a further reasonable alternative to those considered in the IIA.
- 1.6 **ACTION:**
- 1.7 The IIA should revisit the assessment of reasonable alternatives to assess both non-strategic Green Belt sites including those submitted as part of the call for sites. This assessment should take into account the actual proposal that have been submitted in terms of area proposed for development and any mitigation measures as well as Biodiversity Net Gain where this has been highlighted in the submissions.



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Sheffield Plan Consultation Representation Form January – February 2023

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

Responses can be submitted via

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

Please note:

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

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

Data Protection Notice:

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

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

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

Please tick/ delete as appropriate:

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

Yes

No

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

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

Yes

No

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

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

Yes

No

Printed Name: 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, Grace Clarkson, Stuart Garnett and Marcus Jolly
Organisation (if applicable): Hallam Land Management, Strata Homes, Inspired Villages and Lime Developments Limited
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:

Paragraph Number: The Integrated Impact Assessment Report December 2022

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.