

From: [REDACTED]
To: [REDACTED]
Subject: FW: Sheffield Plan Consultation Representation Forms February 2023
Date: 20 February 2023 11:22:39
Attachments: [Reg 19 IDP form 3.pdf](#)
[Reg 19 IDP form 4.pdf](#)
[Reg 19 IDP form 5.pdf](#)
[IDP Feb 2023 The Elms .pdf](#)
[Reg 19 IDP form 1.pdf](#)
[Reg 19 IDP form 2.pdf](#)
[Reg 19 IDP form 7.pdf](#)
[Reg 19 IDP form 8.pdf](#)
[Reg 19 IDP form 9.pdf](#)
[Reg 19 IDP form 6.pdf](#)
Importance: High

Good morning, my apologies I'm just resending this email as I didn't receive a delivery acknowledgement previously

Kind regards

Rachael

Rachael Martin BA DIPTP MRTPI

Director



a: 32 Eyre Street, Sheffield, S1 4QZ

w: www.idplanning.co.uk

From: Rachael Martin

Sent: Monday, February 20, 2023 8:40 AM

To: sheffieldplan@sheffield.gov.uk

Subject: Sheffield Plan Consultation Representation Forms February 2023

Importance: High

Dear Sir/Madam,

I am writing with regard to the above consultation and attached 9 completed response forms on behalf of our client Hft. The responses should be read in conjunction with our full representation statement, particularly forms 8 and 9.

I trust this is acceptable but please do not hesitate to contact me if you need any further information.

Kind regards

Rachael

Rachael Martin BA DIPTP MRTPI

Director



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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>
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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: Rachael Martin for ID Planning

Signature:



Date: 17.2.23

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:
Organisation (if applicable): Hft
Address: c/o Agent
Postcode:
Tel:
Fax:
Email:

2. Agent Details (if applicable)

Agent: Rachael Martin
Organisation (if applicable): ID Planning
Address: 32 Eyre Street
Postcode: S1 4QZ
Tel: 
Fax:
Email: 

Part B - Your representation

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

Name or Organisation: Hft

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

Policy Number:

Paragraph Number: 2.10

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.

Paragraph 2.10 of the plan sets out eight aims which flow from the Vision and are shown in figure 1. Aim 3 is 'Thriving neighbourhoods and communities. More specific objectives detailed on page 16 of the Plan states that the Plan will create a housing market that works for everyone which provides quality, choice and affordability. The third objective states that the supply of affordable housing, accessible market housing and specialist housing for older people, disabled people and other vulnerable groups will be increased.

We support the objectives to create thriving neighbourhoods and communities providing choice in the housing market.

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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Yes

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Printed Name: Rachael Martin for ID Planning

Signature:



Date: 17.2.23

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Organisation (if applicable): ID Planning
Address: 32 Eyre Street
Postcode: S1 4QZ
Tel: 
Fax:
Email: 

Part B - Your representation

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

Name or Organisation: Hft

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

Policy Number:

Paragraph Number: 3.1-3.8

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.

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No

4.(2) **Sound** Yes

No

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

No

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Paragraphs 3.1 to 3.4 state that the plan delivers sufficient new development to meet the city's needs to 2039. No reference is made to the spatial approach not meeting the full housing need figure.

The plan does not meet the full housing need of the city and therefore conflicts with the aims and objectives of the plan for thriving neighbourhoods and communities.

Paragraph 3.8 of the Plan refers to growth figures reflecting the capacity of the existing urban area and the restrictions imposed by the Green Belt. Reference is made to several supporting documents, whilst these provide a range of housing need figures based on economic development, they do not justify the proposed figure of 35,530 homes (2,090pa) detailed in Policy SP1.

No evidence is provided in the plan or supporting documents to support or justify the alternative approach to the standard method for housing need or to clearly justify exceptional circumstances for the use of an alternative capacity led approach. No evidence is provided to justify the proposed housing figure.

Please refer to our full statement for further information

Continue on a separate sheet if necessary

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The plan in its current form is not sound in the absence of supporting evidence providing exceptional circumstances to justify the use of an alternative approach to housing delivery.

The plan in its current form is not positively prepared or effective and further evidence is needed to justify the proposed approach and how the proposed strategy will deliver all the aims and objectives of the vision.

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Yes

No

Printed Name: Rachael Martin for ID Planning

Signature:



Date: 17.2.23

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Part A- Personal Details

1. Personal Details

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Organisation (if applicable): Hft
Address: c/o Agent
Postcode:
Tel:
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Email:

2. Agent Details (if applicable)

Agent: Rachael Martin
Organisation (if applicable): ID Planning
Address: 32 Eyre Street
Postcode: S1 4QZ
Tel: 
Fax:
Email: 

Part B - Your representation

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

Name or Organisation: Hft

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

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Policy SP1 part a) states that the Sheffield Plan will deliver 35,530 new homes by 2039. There is no evidence or clear methodology to support how this figure has been derived. Supporting Document, Housing, Economic Growth and Demographic Modelling Report (2021) concludes it is reasonable for the council to consider a range of housing need between 2,000 and 2,300 dwellings per annum. The proposed housing figure reflects the bottom range of this figure with no justification provided on how the figure proposed has been derived.

We are aware of the Transport, Regeneration and Climate Policy Committee Report, 3 November 2022 which refers to the Cooperative Executive decision in February 2022 agreeing that the housing requirement for the City should be limited to the number of homes that can be accommodated on suitable brownfield and previously undeveloped (greenfield) sites in the existing urban area and that the release of Green Belt land for development should be limited.

Reference is made to the officer reports to committee (February or November) in supporting documents in the evidence base (the Site Selection Methodology and Green Belt Review Addendum), however, the committee report and executive decision minutes are not provided as part of the Regulation 19 consultation.

Given the length and complexity of the Local Plan process, a technical paper detailing the methodology of how the housing requirement figure has been set is required and evidence to support how the strategy for the City and each sub area is justified.

In the absence of a methodology for consideration and review, the proposed housing requirement of 2,090dpa is not consistent with national policy, positively prepared or justified.

The proposed Plan is unsound because the proposed approach to the housing requirement is not justified.

Part h of the policy states the Plan will protect existing Green Belt boundaries around existing built up areas. This conflicts with the objectives of the plan detailed on page 16 which include 'creating a housing market which provides quality, choice and affordability'. The proposed strategy delivering the majority of growth to the Urban Area and based on a capacity approach does not meet housing need and limits choice for residents.

The policy does not refer to the delivery of infrastructure to support new homes such as schools, or health provision. This should be considered within the overall growth policy to ensure a sustainable approach.

Policy SP1 is not justified and has not been positively prepared. Evidence is required to demonstrate the exceptional circumstances to justify the approach to housing supply and that the supply includes a variety of land and that housing needs will be addressed as detailed in the aims and objectives of the plan.

Please refer to our full statement for further information

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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Evidence is required to demonstrate the exceptional circumstances to justify the approach to housing supply and that the supply includes a variety of land and that housing needs will be addressed as detailed in the aims and objectives of the plan.

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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:

To discuss the strategy and soundness of the Plan more fully

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Signature:



Date: 17.2.23

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Address: 32 Eyre Street
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Tel: 
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Email: 

Part B - Your representation

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

Name or Organisation: Hft

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

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Policy SP2 states that the majority of future growth will be on previously developed sites in the existing urban area including the main urban area and the towns of Stockbridge/ Deepcar and Chapelton/High Green.

The proposed strategy defines nine sub areas across the City, and states that each area has its own strategy set out in policies SA1 to SA9. The policy states the sub areas will deliver a pattern of sustainable development in the urban area. It is not considered the application of the capacity approach to sub areas provides a sustainable development pattern of growth.

As referred to in response to policy SP1, the policy fails to consider the need for additional infrastructure to support the proposed growth. The capacity approach and sub area development strategy results in a fragmented and unsustainable population growth without strategic consideration of housing need or delivery of supporting services and infrastructure. Reference is made to contributions to additional infrastructure including education and healthcare provision in some of the sub areas but no sites have been allocated or a clear strategy identified to ensure sustainable delivery to support growth.

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Policy SP2 fails to deliver a strategic approach to growth. We support the sub area approach in general, the combination of this and the capacity approach fail to deliver a strategic approach to meet identified needs. There are no exceptional circumstances to support the proposed housing growth figure and capacity approach. Policy SP2 is not sound in its current form as it is not currently justified or positively prepared.

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Yes

No

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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: Rachael Martin for ID Planning

Signature:



Date: 17.2.23

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Part A- Personal Details

1. Personal Details

Name:
Organisation (if applicable): Hft
Address: c/o Agent
Postcode:
Tel:
Fax:
Email:

2. Agent Details (if applicable)

Agent: Rachael Martin
Organisation (if applicable): ID Planning
Address: 32 Eyre Street
Postcode: S1 4QZ
Tel: 
Fax:
Email: 

Part B - Your representation

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

Name or Organisation: Hft

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.

Part a) of the policy states that approximately 755 new homes will be delivered in the Southwest Sheffield Sub Area. The allocations detailed in Appendix 1 provide a capacity of 701, it is not clear where the remaining 54 (to total 755) are derived.

The capacity led approach results in limited growth in this sustainable area of the city which benefits from a railway station, park and ride and existing and proposed cycle routes to the city centre.

As referred to in our response to Policy SP1, in the absence of a clear methodology to support the proposed growth strategy it is not considered the plan has been positively prepared.

Part b) of the Policy refers to a housing requirement figure of at least 40 homes in Dore Neighbourhood Plan. The policy includes a footnote advising that the figure of 40 include 14 homes on large sites and 26 homes with existing planning permission on small sites (as at 1st April 2022). The requirement figure of 'at least 10' homes is considered vague and open to interpretation and a more robust figure and allocation should be provided to ensure delivery as discussed in section 5 of this representation.

Please refer to our full statement for further information

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.

The plan in its current form is not positively prepared or justified and policy SA7 should be amended to allocate a site for housing in Dore to deliver the Neighbourhood Plan requirement and housing need.

Please refer to our full statement for further information

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.

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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

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To discuss the strategy and soundness of the Plan more fully

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No

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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: Rachael Martin for ID Planning

Signature:



Date: 17.2.23

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Address: 32 Eyre Street
Postcode: S1 4QZ
Tel: 
Fax:
Email: 

Part B - Your representation

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

Name or Organisation: Hft

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

Policy Number: H1, Table 1 and Table 2

Paragraph Number: 5.1 -5.6

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.

Paragraphs 5.1 to 5.6 provide a summary of the proposed housing strategy and state the housing requirement (Policy SP1) provides sufficient housing to support the city's economic growth aspirations and forecast levels of population and household change over the period 2022-2029. As referred to previously, this statement conflicts with the plans aims and objectives to create a housing market which works for everyone and provides quality, choice and affordability (P16 of the Plan).

Paragraph 5.3 states that sufficient sites have been allocated and identified to provide for the first five years of the plan period. Table 1 shows that 630 dwellings will be provided through capacity on large sites within planning permission not proposed as allocations. There is no clear supporting evidence which provides a trajectory for delivery of these sites or evidence to suggest the Council have applied a lapse rate to account for non implementation.

The second row of table 1 shows that allocated sites are expected to provide for 26,853 homes which equates to 75% of the plan requirement (35,558 table 1, or 35,530 as detailed in policy SP1).

The list of allocations (Appendix 1) and supporting Site Selection Methodology provide detailed site appraisals. We question the deliverability and developability of site allocations. The site appraisals refer to sites have planning permissions, a limited review of the allocations in the southwest sub area suggests permissions associated with sites SWS11 and SWS 15 have lapsed. The delivery of these sites and potentially others in the first 5 years is therefore questionable.

Additional sites we have reviewed are described as developable but contrary to NPPF and NPPG there is no evidence to support there is a reasonable prospect they will be deliverable. For example site LR01 is currently operating as an existing retail DIY store, there is no evidence in the detailed site appraisal to support that it is likely to become available after the first five years of the plan.

Paragraph 5.5 and 5.6 of the Plan and Table 1 shows that approximately 15% (4,675 homes) of the housing requirement (SP1) is expected to be delivered from developable sites in 'Broad Locations for Growth' in years 6-15'.

Annex 2 of NPPF defines what constitutes a developable site. Paragraph 20 of NPPG (68-020-20190722) provides further guidance on demonstrating there is a 'reasonable prospect' of a site being available and viably developed at the point envisaged.

There is no evidence provided within the plan or methodology to demonstrate there is a reasonable prospect the broad locations for growth are developable in accordance with NPPF and NPPG. Evidence is required for each of the proposed broad locations for growth to justify their inclusion in the housing supply

Chapter 5 and policy H1 conflict with the aims and objectives of the Plan. The unjustified housing strategy which will not meet full housing needs is exacerbated through the insufficient supply of housing land. Allocating land to meet 77% of the proposed housing requirement does not meet the objective (Page 16) to ensure the City has an adequate supply of residential development land so the city can meet its requirement for new housing.

Table 2 distributes the housing supply by sub area. The capacity approach results in growth directed to sub areas where land is available resulting in unsustainable patterns of development. The strategy does not result in the allocation of a variety of land and does not meet identified housing needs.

This is demonstrated by comparing Table 6.7 of the Sheffield and Rotherham SHMA with Table 2. While the Housing Market Areas used in the SHMA (Fig 3.5, Page 29) unfortunately do not fully reflect the Local Plan sub areas a general comparison can be considered.

Table 6.7 of the SHMA states that the annual affordable need for south west Sheffield is 180 homes, for Sheffield urban west the annual shortfall is 336. Together whilst these areas exceed the south west Local Plan sub area, it is clear that the capacity allocation of 755 in the south west over 15 years will not meet the identified needs and is therefore not justified or positively prepared. Similar scenarios are evident in the tables (6.7 of the SHMA and Table 2 of Part 1 of the Plan) for south Sheffield and north west Sheffield.

Table 2 shows that most housing supply and therefore growth is directed to the east and southeast areas (2,940 and 1,640 dwellings). The south east area has a low housing need figure (6 homes per annum) while the East, Manor and Arbourthorne, which correlate to the local plan east sub area have a surplus of 93 homes per annum

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Continue on a separate sheet if necessary

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There is no evidence to suggest that the Council has sought to apply a lapse rate to the housing supply and allocation figures. The Plan fails to provide a transparent evidence base to support the proposed supply figures. The lack of a delivery trajectory for the capacity led strategy which does not meet housing need raises further questions as to the effectiveness of the strategy.

The plan is not positively prepared because it is not clear or justified how the supply figures have been calculated. The proposed figures are based on expired planning permissions and there is no evidence of lapse rates or delivery rates being applied to inform a trajectory for the plan period.

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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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Yes

No

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

Yes

No

Printed Name: Rachael Martin for ID Planning

Signature:



Date: 17.2.23

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2. Agent Details (if applicable)

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Organisation (if applicable): ID Planning
Address: 32 Eyre Street
Postcode: S1 4QZ
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Part B - Your representation

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

Name or Organisation: Hft

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

Policy Number:

Paragraph Number:

Policies Map: Legend

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.

The proposed colours used to define the site allocations are considered to be confusing and are not clearly visible on the interactive map. Site allocations are detailed using a simple outline with different allocations largely adopting a range of red, orange, pink and purple colours. The pink housing allocations in particular are not clearly visible.

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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The map should be amended to include hatching on allocations and or to use more vivid colours so that against the other grey and green layers of the plan allocations are clearly visible.

Continue on a separate sheet if necessary

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Yes

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Name or Organisation: Hft

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

Policy Number:

Paragraph Number:

Policies Map: Allocation

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.

This section of the representation statement supports the amendment of Green Belt boundaries and allocation of a site. We have noted that we believe the plan in its current form is unsound on a number of grounds, mainly:

- That the proposed approach to housing delivery is unsound in the absence of exceptional circumstances to deviate from the standard method;
- That there is no evidence to determine how the proposed housing figure (35,530) has been derived.
- On the evidence available the proposed housing figure is too low and will not meet housing needs or the aims and objectives of the plan;
- There is no evidence to support the proposed housing supply to demonstrate it is robust, deliverable or developable;
- The proposed strategy will not meet the aims and objectives of the plan in providing choice and flexibility of housing;
- The proposed strategy will result in unsustainable growth in the absence of the allocation and delivery of supporting infrastructure leading to unsustainable patterns of travel;
- The proposed strategy will not address housing need

Should the Inspector agree with our comments we consider sites currently in the Green Belt should be released for housing allocation and development. The Elms site (existing buildings and land to the rear), Old Hay Lane, Dore (Location plan attached to this representation) is suitable for removal from the Green Belt and allocation for housing to meeting housing need in Dore.

[The Elms, Old Hay Lane, Dore, Sheffield S17](#)

[Site HELAA Reference SO3069](#)

A site location plan is enclosed (Appendix 1) and the site is described in section 2 of this representation. The site is not identified as a proposed allocation, we object to this site not being identified as a residential allocation. The northern part of site comprises an existing dwelling providing residential care for adults with learning disabilities. Land to the south of the dwelling is currently open. The site adjoins existing residential development within the urban area to the east and north and is therefore in a sustainable location for housing development.

There are no constraints to the physical delivery of the site. Access to the site can be gained from the existing site access on the eastern side of the northern boundary from Old Hay Lane. A second access is proposed on the western side of the northern site boundary, again from Old Hay Lane.

The site currently lies in the Green Belt but is well contained by Old Hay Lane which together with a strong tree and hedge row form a strong and defensible western boundary to land adjoining the proposed site.

The site is included in the Green Belt Review 2020, smaller parcel DS6-B. The parcel scored 14/20 against the Green Belt purposes which represents an average score where parcels were concluded as not meeting Green Belt purposes very strongly. More than 60% of the parcels considered attracted a score between 14 and 16.

The Green Belt Review considered scores for purposes 1 and 2 of the Green Belt as most parcels score similarly against purposes 3 and 5. The site scored 3 for purpose 1, to check the unrestricted sprawl of large built up areas and scored 1 against purpose 2, to prevent neighbouring towns merging into one another. The review concluded the site (parcel) performs a moderate Green Belt function.

The Council has identified a housing requirement figure of at least 40 homes in Dore Neighbourhood Plan. The footnote advises that 30 of these have existing planning permission. There is a requirement for at least 10 more homes in the area to be delivered in accordance with the other policies of the Plan and the Dore Neighbourhood Plan. This acknowledges the need for development in this sustainable location.

The Dore Neighbourhood Plan (DNP) does not allocate any land for new housing development. Policy 5 of the DNP relates to new infill housing in the Dore Housing Area. The supporting text states that new development involving the loss of mature residential gardens may be inappropriate as it could erode the attractive and distinctive character of the housing area. Tandem development is also cautioned against as potentially disrupting the urban grain of the area.

The allocation of The Elms site would ensure delivery of additional houses in Dore in a sustainable way having regard to the constraints of the area and policies of the emerging plan and DNP.

Policy H1 of the Local Plan states that a wide range of new housing will be supported to meet identified needs including independent living accommodation and housing to meet the needs of disabled people.

The Elms currently provides housing to meet the needs of people with learning disabilities. The existing building is not fit for purpose and a new purpose built facility is required to provide additional and enhanced supported living accommodation on the wider site. Additional market housing would ensure the supported living homes are fully integrated with the wider community and would assist in meeting the Local Plan requirement for the area.

We consider that there are exceptional circumstances to allocate the site for a mix of market housing and supported living to meet the housing requirement of the Neighbourhood Plan. The Elms site will provide a suitable and natural but contained sustainable extension to the settlement which the Green Belt Review concluded does not perform a strong Green Belt function.

Please refer to our full statement for further information

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.

We enclose an indicative masterplan (Appendix 2) for the site which shows the retention of the existing buildings and conversion to residential use, the development of three additional dwellings along with a supported living facility providing accommodation for up to 15 residents in purpose built accommodation.

We consider there are seven exceptional circumstances which apply to support the amendment of Green Belt boundaries and allocation for housing and supported living accommodation as follows

The site performs a moderately against the Green Belt purposes;

Strong and defensible boundaries can be created to a new Green Belt boundary to the west of the site;

Site currently provides residential care in an adapted building that is unsuitable and constrained;

New purpose built accommodation is required to deliver high quality supported living to adults with learning disabilities. New accommodation to promote greater independent living is supported by Sheffield City Council for permanent housing;

New purpose built accommodation will increase the number of self contained apartments on the site, increasing supported living accommodation in accordance with Policy H1 of the Local Plan.

Additional housing on the site will assist in meeting the housing needs of Dore and the South West sub area in a sustainable way, protecting the local characteristics of Dore Neighbourhood Area.

Additional housing on the site will provide capital funding to invest in the delivery of purpose built high quality supported living accommodation on the site.

The Elms site is a deliverable site and it available now. It is in a suitable location for development and is achievable being free from any physical development constraints and will assist in meeting identified housing needs.

Please refer to our full statement for further information

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:

To discuss the strategy and soundness of the Plan more fully

Please note that the inspector will make the final decision as to who is necessary to participate in hearing sessions, and to which hearing session(s) they should attend, and they will determine the most appropriate procedure to adopt to hear those who wish to participate at the examination hearings.

Sheffield Plan Consultation Representation Form January – February 2023

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

Responses can be submitted via

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

Please note:

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

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

Data Protection Notice:

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

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

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

Please tick/ delete as appropriate:

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

Yes

No

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

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

Yes

No

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

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

Yes

No

Printed Name: Rachael Martin for ID Planning

Signature:



Date: 17.2.23

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:
Organisation (if applicable): Hft
Address: c/o Agent
Postcode:
Tel:
Fax:
Email:

2. Agent Details (if applicable)

Agent: Rachael Martin
Organisation (if applicable): ID Planning
Address: 32 Eyre Street
Postcode: S1 4QZ
Tel: 
Fax:
Email: 

Part B - Your representation

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

Name or Organisation: Hft

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

Policy Number: Policy SP1, SP2 H1

Paragraph Number:

Policies Map: Allocation

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.

Please refer to our full statement for further information

Continue on a separate sheet if necessary

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Please refer to our full statement for further information

- The plan is not sound in the absence of supporting evidence providing exceptional circumstances to justify the use of an alternative approach to housing development.
- The plan is not positively prepared and conflicts with the aims and objectives of the plan.
Exceptional Circumstances are required to justify the proposed capacity led approach
Evidence is required to justify the decision to not meet housing the full housing need figure
Evidence is required to justify the proposed housing need figure.
Evidence is required to justify the approach to housing need and explain how the proposed strategy will deliver the aims and objectives of the plan, particularly aim 3.
- A housing technical paper is required to demonstrate the proposed approach to housing is justified and to detail the methodology of how the housing requirement figure has been set.
- Evidence is required to justify the plan has been positively prepared and that the supply includes a variety of land and that housing needs will be addressed.
- The plan is not positively prepared as it is not clear or justified how the supply figures have been calculated
- *Evidence of the supply including the application of lapse rates, assumed delivery rates and a trajectory is required.*
- *Evidence is needed to demonstrate that allocations are deliverable;*
- *Further evidence is required to demonstrate the Broad Locations for Growth are developable.*
- The policy map legend requires amendments to be clearer and more legible;
- The Elms site in Dore should be removed from the Green Belt and allocated for housing including the delivery of supported living accommodation.
- The Green Belt boundary should be amended on the western side of Dore.

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.

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Yes

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No

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To discuss the strategy and soundness of the Plan more fully

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.

February 2023



**Representations to the
Sheffield Plan: Our City, Our Future
Publication (Pre Submission) Draft
With Specific Reference to Land associated with The Elms, Old
Hay Lane, Dore Sheffield.**

On behalf of

Hft

Prepared by

I D Planning
32 Eyre Street,
Sheffield
S1 4QZ



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1. Introduction

- 1.1 These representations have been prepared on behalf of Hft in response to the Sheffield Plan, Publication (Pre-Submission) Draft, December 2022.
- 1.2 These representations are made in the specific context of their site, The Elms and associated land, Old Hay Lane, Dore. The site is identified as Green Belt in the Publication Draft Plan.
- 1.3 These representations seek to make comment on the Publication Plan in the context of this site and highlight the site's suitability for residential allocation as a deliverable site for supported and market housing to meet identified needs on adoption of the plan.

2. Site Description, Current Allocation and Proposed Allocation.

The Elms, Old Hay Lane, Dore, Sheffield.

- 2.1 The site comprises approximately 1.5ha of land currently in the Sheffield Green Belt on the western edge of the built up area of Dore. The site comprises two distinct areas, the northern part of the site comprises existing buildings (a Victorian house and associated buildings) and formal gardens and the southern part is currently undeveloped land.
- 2.2 Old Hay Lane forms the northern boundary of the site, a public footpath forms the eastern boundary with the properties of Old Hay Close beyond. The footpath forms the existing and proposed boundary to the built up area and Green Belt.
- 2.3 Open green space known as Topley Brook Green Space is situated to the south east with open fields bounded by some trees stretching south to Old Hay Brook which lies within an area of mature trees and landscape.
- 2.4 The western boundary of the site is formed by a tree and hedge line. A field adjoins the subject site and Old Hay Lane stretches southwards within a strong hedgerow and tree line forming a strong western boundary to the urban area. To the west beyond Old Hay Lane open fields continue towards the City Boundary and Peak District National Park.
- 2.5 Hft are a national charity providing services for people with learning disabilities, offering support from a couple of hours a week to 24 hour support and care. Hft provide supported housing, residential care, community support and day services to enable people to live the best possible life.
- 2.6 The Elms at Dore is operated by Hft and currently provides residential care for people on the site. The existing premises comprises a four story (including basement) Victorian property adapted to provide living accommodation for seven people. Additional supported living accommodation is provided in smaller building on the site known as The Lodge and The Stables.
- 2.7 The existing buildings have been adapted over time and do not meet the requirements to provide the best care or accommodation for adults with learning disabilities. Hft are seeking to provide new contemporary purpose-built accessible accommodation that is suitable for people with a wide range of needs in buildings that are able to adapt to changing needs over time.

Proposed Allocation

- 2.8 The Regulation 19 Policies Map does not allocate the site for development. The site falls within the Green Belt.

Proposed Changes to make the Plan Sound.

- 2.9 This representation demonstrates that the Council have not positively prepared their plan and that it is not deliverable. The representation supports the proposed removal of the site from the green belt and allocation for housing including an element of supported living.

- 2.10 The site is deliverable and available and therefore should come forward in the first five years of the plan following adoption to provide enhanced supported living accommodation and additional market housing to provide a choice of housing supply and meet local needs.

3.0 Representations to the Publication Local Plan

- 3.1 This section of the representation statement provides comment on Part 1 of the Sheffield Plan and the Interactive Policies Map.

Sheffield Plan: Our City, Our Future Publication (Pre-Submission) Draft Part 1: Vision, Spatial Strategy, Sub Area Policies and Site Allocations.

2 Vision, Aims and Objectives

Sheffield Plan Aims and objectives- Page 15

- 3.2 Paragraph 2.10 of the plan sets out eight aims which flow from the Vision and are shown in figure 1. Aim 3 is 'Thriving neighbourhoods and communities. More specific objectives detailed on page 16 of the Plan states that the Plan will create a housing market that works for everyone which provides quality, choice and affordability. The third objective states that the supply of affordable housing, accessible market housing and specialist housing for older people, disabled people and other vulnerable groups will be increased.
- 3.3 We support the objectives to create thriving neighbourhoods and communities providing choice in the housing market.
- 3.4 It is considered that the Aim 3 of the plan is **sound** and has been **positively prepared**.

3 Growth Plan and Spatial Strategy

Planning for Growth – Paragraph 3.1

- 3.5 Paragraphs 3.1 to 3.4 state that the plan delivers sufficient new development to meet the city's needs to 2039. No reference is made to the spatial approach not meeting the full housing need figure.
- 3.6 The plan does not meet the full housing need of the city and therefore conflicts with the aims and objectives of the plan for thriving neighbourhoods and communities.
- 3.7 Paragraph 3.8 of the Plan refers to growth figures reflecting the capacity of the existing urban area and the restrictions imposed by the Green Belt. Reference is made to several supporting documents, whilst these provide a range of housing need figures based on economic development, they do not justify the proposed figure of 35,530 homes (2,090pa) detailed in Policy SP1.
- 3.8 No evidence is provided in the plan or supporting documents to support or justify the alternative approach to the standard method for housing need or to clearly justify exceptional circumstances for the use of an alternative capacity led approach. No evidence is provided to justify the proposed housing figure.
- 3.9 **The plan in its current form is not sound in the absence of supporting evidence providing exceptional circumstances to justify the use of an alternative approach to housing delivery.**

- 3.10 The plan in its current form is not **positively prepared** or effective and **further evidence** is needed to justify the proposed approach and how the proposed strategy will deliver all the aims and objectives of the vision.

Policy SP1: Overall Growth Plan

- 3.11 **Policy SP1** part a) states that the Sheffield Plan will deliver 35,530 new homes by 2039. There is no evidence or clear methodology to support how this figure has been derived. Supporting Document, Housing, Economic Growth and Demographic Modelling Report (2021) concludes it is reasonable for the council to consider a range of housing need between 2,000 and 2,300 dwellings per annum. The proposed housing figure reflects the bottom range of this figure with no justification provided on how the figure proposed has been derived.
- 3.12 We are aware of the **Transport, Regeneration and Climate Policy Committee Report, 3 November 2022** which refers to the Cooperative Executive decision in February 2022 agreeing that the housing requirement for the City should be limited to the number of homes that can be accommodated on suitable brownfield and previously undeveloped (greenfield) sites in the existing urban area and that the release of Green Belt land for development should be limited.
- 3.13 Reference is made to the officer reports to committee (February or November) in supporting documents in the evidence base (the Site Selection Methodology and Green Belt Review Addendum), however, the committee report and executive decision minutes are not provided as part of the Regulation 19 consultation.
- 3.14 Given the length and complexity of the Local Plan process, a technical paper detailing the methodology of how the housing requirement figure has been set is required and evidence to support how the strategy for the City and each sub area is justified.
- 3.15 In the absence of a methodology for consideration and review, the proposed housing requirement of 2,090dpa is **not consistent with national policy, positively prepared or justified**.
- 3.16 The proposed Plan is **unsound** because the proposed approach to the housing requirement is **not justified**.
- 3.17 **Part h** of the policy states the Plan will protect existing Green Belt boundaries around existing built up areas. This conflicts with the objectives of the plan detailed on page 16 which include 'creating a housing market which provides quality, choice and affordability'. The proposed strategy delivering the majority of growth to the Urban Area and based on a capacity approach does not meet housing need and limits choice for residents.
- 3.18 The policy does not refer to the delivery of infrastructure to support new homes such as schools, or health provision. This should be considered within the overall growth policy to ensure a sustainable approach.
- 3.19 **Policy SP1 is not justified** and has not been **positively prepared**. Evidence is required to demonstrate the exceptional circumstances to justify the approach to housing supply to demonstrate that the supply includes a variety of land and that housing needs will be addressed as detailed in the aims and objectives of the plan.

Policy SP2: Spatial Strategy

- 3.20 Policy SP2 states that the majority of future growth will be on previously developed sites in the existing urban area including the main urban area and the towns of Stockbridge/ Deepcar and Chapeltown/High Green.
- 3.21 The proposed strategy defines nine sub areas across the City, and states that each area has its own strategy set out in policies SA1 to SA9. The policy states the sub areas will deliver a pattern of sustainable development in the urban area. It is not considered the application of the capacity approach to sub areas provides a sustainable development pattern of growth.
- 3.22 As referred to in response to policy SP1, the policy fails to consider the need for additional infrastructure to support the proposed growth. The capacity approach and sub area development strategy results in a fragmented and unsustainable population growth without strategic consideration of housing need or delivery of supporting services and infrastructure. Reference is made to contributions to additional infrastructure including education and healthcare provision in some of the sub areas but no sites have been allocated or a clear strategy identified to ensure sustainable delivery to support growth.
- 3.23 **Policy SP2** fails to deliver a strategic approach to growth. We support the sub area approach in general, the combination of this and the capacity approach fail to deliver a strategic approach to meet identified needs. There are no exceptional circumstances to support the proposed housing growth figure and capacity approach. Policy SP2 is not sound in its current form as it is not currently justified or positively prepared.

4 Sheffield's Sub Area Strategy

Southwest Sheffield Sub Area

Policy SA7: Southwest Sheffield Sub Area

- 3.24 Part a) of the policy states that approximately 755 new homes will be delivered in the Southwest Sheffield Sub Area. The allocations detailed in Appendix 1 provide a capacity of 701, it is not clear where the remaining 54 (to total 755) are derived.
- 3.25 The capacity led approach results in limited growth in this sustainable area of the city which benefits from a railway station, park and ride and existing and proposed cycle routes to the city centre.
- 3.26 As referred to in our response to Policy SP1, in the absence of a clear methodology to support the proposed growth strategy it is not considered the plan has been **positively prepared**.
- 3.27 Part b) of the Policy refers to a housing requirement figure of at least 40 homes in Dore Neighbourhood Plan. The policy includes a footnote advising that the figure of 40 include 14 homes on large sites and 26 homes with existing planning permission on small sites (as at 1st April 2022). The requirement figure of 'at least 10' homes is considered vague and open to interpretation and a more robust figure and allocation should be provided to ensure delivery as discussed in section 5 of this representation.
- 3.28 The plan in its current form is not **positively prepared or justified** and policy SA7 should be amended to allocate a site for housing in Dore to deliver the Neighbourhood Plan requirement and housing need.

5. Topic Policies

Housing Growth and Housing Land Supply

- 3.29 Paragraphs 5.1 to 5.6 provide a summary of the proposed housing strategy and state the housing requirement (Policy SP1) provides sufficient housing to support the city's economic growth aspirations and forecast levels of population and household change over the period 2022-2029. As referred to previously, this statement conflicts with the plans aims and objectives to create a housing market which works for everyone and provides quality, choice and affordability (P16 of the Plan).
- 3.30 Paragraph 5.3 states that sufficient sites have been allocated and identified to provide for the first five years of the plan period. Table 1 shows that 630 dwellings will be provided through capacity on large sites within planning permission not proposed as allocations. There is no clear supporting evidence which provides a trajectory for delivery of these sites or evidence to suggest the Council have applied a lapse rate to account for non implementation.
- 3.31 The second row of table 1 shows that allocated sites are expected to provide for 26,853 homes which equates to 75% of the plan requirement (35,558 table 1, or 35,530 as detailed in policy SP1).
- 3.32 The list of allocations (Appendix 1) and supporting Site Selection Methodology provide detailed site appraisals. We question the deliverability and developability of site allocations. The site appraisals refer to sites have planning permissions, a limited review of the allocations in the southwest sub area suggests permissions associated with sites SWS11 and SWS 15 have lapsed. The delivery of these sites and potentially others in the first 5 years is therefore questionable.
- 3.33 Additional sites we have reviewed are described as developable but contrary to NPPF and NPPG there is no evidence to support there is a reasonable prospect they will be deliverable. For example site LR01 is currently operating as an existing retail DIY store, there is no evidence in the detailed site appraisal to support that it is likely to become available after the first five years of the plan.
- 3.34 There is no evidence to suggest that the Council has sought to apply a lapse rate to the housing supply and allocation figures. The Plan fails to provide a transparent evidence base to support the proposed supply figures. The lack of a delivery trajectory for the capacity led strategy which does not meet housing need raises further questions as to the effectiveness of the strategy.
- 3.35 Paragraph 5.5 and 5.6 of the Plan and Table 1 shows that approximately 15% (4,675 homes) of the housing requirement (SP1) is expected to be delivered from developable sites in 'Broad Locations for Growth' in years 6-15'.
- 3.36 Annex 2 of NPPF defines what constitutes a developable site. Paragraph 20 of NPPG (68-020-20190722) provides further guidance on demonstrating there is a 'reasonable prospect' of a site being available and viably developed at the point envisaged.
- 3.37 There is no evidence provided within the plan or methodology to demonstrate there is a reasonable prospect the broad locations for growth are developable in accordance with NPPF and NPPG. Evidence is required for each of the proposed broad locations for growth to justify their inclusion in the housing supply.

- 3.38 Chapter 5 and policy H1 conflict with the aims and objectives of the Plan. The unjustified housing strategy which will not meet full housing needs is exacerbated through the insufficient supply of housing land. Allocating land to meet 77% of the proposed housing requirement does not meet the objective (Page 16) to ensure the City has an adequate supply of residential development land so the city can meet its requirement for new housing.
- 3.39 Table 2 distributes the housing supply by sub area. The capacity approach results in growth directed to sub areas where land is available resulting in unsustainable patterns of development. The strategy does not result in the allocation of a variety of land and does not meet identified housing needs.
- 3.40 This is demonstrated by comparing Table 6.7 of the Sheffield and Rotherham SHMA with Table 2. While the Housing Market Areas used in the SHMA (Fig 3.5, Page 29) unfortunately do not fully reflect the Local Plan sub areas a general comparison can be considered.
- 3.41 Table 6.7 of the SHMA states that the annual affordable need for south west Sheffield is 180 homes, for Sheffield urban west the annual shortfall is 336. Together whilst these areas exceed the south west Local Plan sub area, it is clear that the capacity allocation of 755 in the south west over 15 years will not meet the identified needs and is therefore not justified or positively prepared. Similar scenarios are evident in the tables (6.7 of the SHMA and Table 2 of Part 1 of the Plan) for south Sheffield and north west Sheffield.
- 3.42 Table 2 shows that most housing supply and therefore growth is directed to the east and southeast areas (2,940 and 1,640 dwellings). The south east area has a low housing need figure (6 homes per annum) while the East, Manor and Arbourthorne, which correlate to the local plan east sub area have a surplus of 93 homes per annum.
- 3.43 The plan is not **positively prepared** because it is not clear or justified how the supply figures have been calculated. The proposed figures are based on expired planning permissions and there is no evidence of lapse rates or delivery rates being applied to inform a trajectory for the plan period.

Sheffield Plan Policies Map

Legend.

- 3.44 The proposed colours used to define the site allocations are considered to be confusing and are not clearly visible on the interactive map. Site allocations are detailed using a simple outline with different allocations largely adopting a range of red, orange, pink and purple colours. The pink housing allocations in particular are not clearly visible.
- 3.45 The map should be amended to include hatching on allocations and or to use more vivid colours so that against the other grey and green layers of the plan allocations are clearly visible.

4 Representations to support an Allocation

- 4.1 This section of the representation statement supports the amendment of Green Belt boundaries and allocation of a site. We have noted that we believe the plan in its current form is unsound on a number of grounds, mainly:
- That the proposed approach to housing delivery is unsound in the absence of exceptional circumstances to deviate from the standard method;
 - That there is no evidence to determine how the proposed housing figure (35,530) has been derived.
 - On the evidence available the proposed housing figure is too low and will not meet housing needs or the aims and objectives of the plan;
 - There is no evidence to support the proposed housing supply to demonstrate it is robust, deliverable or developable;
 - The proposed strategy will not meet the aims and objectives of the plan in providing choice and flexibility of housing;
 - The proposed strategy will result in unsustainable growth in the absence of the allocation and delivery of supporting infrastructure leading to unsustainable patterns of travel;
 - The proposed strategy will not address housing need
- 4.2 Should the Inspector agree with our comments we consider sites currently in the Green Belt should be released for housing allocation and development. The Elms site (existing buildings and land to the rear), Old Hay Lane, Dore (Location plan attached to this representation) is suitable for removal from the Green Belt and allocation for housing to meeting housing need in Dore.
- The Elms, Old Hay Lane, Dore, Sheffield S17*
Site HELAA Reference SO3069
- 4.3 A site location plan is enclosed (Appendix 1) and the site is described in section 2 of this representation. The site is not identified as a proposed allocation, we object to this site not being identified as a residential allocation.
- 4.4 The northern part of site comprises an existing dwelling providing residential care for adults with learning disabilities. Land to the south of the dwelling is currently open. The site adjoins existing residential development within the urban area to the east and north and is therefore in a sustainable location for housing development.
- 4.5 There are no constraints to the physical delivery of the site. Access to the site can be gained from the existing site access on the eastern side of the northern boundary from Old Hay Lane. A second access is proposed on the western side of the northern site boundary, again from Old Hay Lane.
- 4.6 The site currently lies in the Green Belt but is well contained by Old Hay Lane which together with a strong tree and hedge row form a strong and defensible western boundary to land adjoining the proposed site.
- 4.7 The site is included in the Green Belt Review 2020, smaller parcel DS6-B. The parcel scored 14/20 against the Green Belt purposes which represents an average score where parcels were concluded as not meeting Green Belt purposes very strongly. More than 60% of the parcels considered attracted a score between 14 and 16.
- 4.8 The Green Belt Review considered scores for purposes 1 and 2 of the Green Belt as most parcels score similarly against purposes 3 and 5. The site scored 3 for purpose

1, to check the unrestricted sprawl of large built up areas and scored 1 against purpose 2, to prevent neighbouring towns merging into one another. The review concluded the site (parcel) performs a moderate Green Belt function.

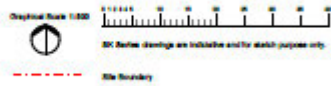
- 4.9 The Council has identified a housing requirement figure of at least 40 homes in Dore Neighbourhood Plan. The footnote advises that 30 of these have existing planning permission. There is a requirement for at least 10 more homes in the area to be delivered in accordance with the other policies of the Plan and the Dore Neighbourhood Plan. This acknowledges the need for development in this sustainable location.
- 4.10 The Dore Neighbourhood Plan (DNP) does not allocate any land for new housing development. Policy 5 of the DNP relates to new infill housing in the Dore Housing Area. The supporting text states that new development involving the loss of mature residential gardens may be inappropriate as it could erode the attractive and distinctive character of the housing area. Tandem development is also cautioned against as potentially disrupting the urban grain of the area.
- 4.11 The allocation of The Elms site would ensure delivery of additional houses in Dore in a sustainable way having regard to the constraints of the area and policies of the emerging plan and DNP.
- 4.12 Policy H1 of the Local Plan states that a wide range of new housing will be supported to meet identified needs including independent living accommodation and housing to meet the needs of disabled people.
- 4.13 The Elms currently provides housing to meet the needs of people with learning disabilities. The existing building is not fit for purpose and a new purpose built facility is required to provide additional and enhanced supported living accommodation on the wider site. Additional market housing would ensure the supported living homes are fully integrated with the wider community and would assist in meeting the Local Plan requirement for the area.
- 4.14 We consider that there are exceptional circumstances to allocate the site for a mix of market housing and supported living to meet the housing requirement of the Neighbourhood Plan. The Elms site will provide a suitable and natural but contained sustainable extension to the settlement which the Green Belt Review concluded does not perform a strong Green Belt function.
- 4.15 We enclose an indicative masterplan (Appendix 2) for the site which shows the retention of the existing buildings and conversion to residential use, the development of three additional dwellings along with a supported living facility providing accommodation for up to 15 residents in purpose built accommodation.
- 4.16 We consider there are seven exceptional circumstances which apply to support the amendment of Green Belt boundaries and allocation for housing and supported living accommodation as follows
- The site performs a moderately against the Green Belt purposes;
 - Strong and defensible boundaries can be created to a new Green Belt boundary to the west of the site;
 - Site currently provides residential care in an adapted building that is unsuitable and constrained;
 - New purpose built accommodation is required to deliver high quality supported living to adults with learning disabilities. New accommodation to promote greater independent living is supported by Sheffield City Council for permanent housing;

- New purpose built accommodation will increase the number of self contained apartments on the site, increasing supported living accommodation in accordance with Policy H1 of the Local Plan.
 - Additional housing on the site will assist in meeting the housing needs of Dore and the South West sub area in a sustainable way, protecting the local characteristics of Dore Neighbourhood Area.
 - Additional housing on the site will provide capital funding to invest in the delivery of purpose built high quality supported living accommodation on the site.
- 4.17 The Elms site is a deliverable site and it available now. It is in a suitable location for development and is achievable being free from any physical development constraints and will assist in meeting identified housing needs.

5.0 Required Changes to the Initial Draft Plan

- 5.1 The bullet points below provide a summary of the changes required to the Publication Sheffield Plan to ensure the tests of soundness can be met.
- The plan is not sound in the absence of supporting evidence providing exceptional circumstances to justify the use of an alternative approach to housing development.
 - The plan is not positively prepared and conflicts with the aims and objectives of the plan.
 - o *Exceptional Circumstances are required to justify the proposed capacity led approach*
 - o *Evidence is required to justify the decision to not meet housing the full housing need figure*
 - o *Evidence is required to justify the proposed housing need figure.*
 - o *Evidence is required to justify the approach to housing need and explain how the proposed strategy will deliver the aims and objectives of the plan, particularly aim 3.*
 - A housing technical paper is required to demonstrate the proposed approach to housing is justified and to detail the methodology of how the housing requirement figure has been set.
 - Evidence is required to justify the plan has been positively prepared and that the supply includes a variety of land and that housing needs will be addressed.
 - The plan is not positively prepared as it is not clear or justified how the supply figures have been calculated
 - o *Evidence of the supply including the application of lapse rates, assumed delivery rates and a trajectory is required.*
 - o *Evidence is needed to demonstrate that allocations are deliverable;*
 - o *Further evidence is required to demonstrate the Broad Locations for Growth are developable.*
 - The policy map legend requires amendments to be clearer and more legible;
 - The Elms site in Dore should be removed from the Green Belt and allocated for housing including the delivery of supported living accommodation.
 - The Green Belt boundary should be amended on the western side of Dore.

Appendix 1 - The Elms Site Location Plan



Appendix 2 - Indicative Masterplan layout



Rev	Description	Date	By
1	Drawing 576-PKA-XX-ZZ-DR-SK00 Masterplan Option 3		Rev
			Project 576 The Elms
		11/04/22	Date
		@ A3	Scale

peakarchitects[^]