

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

### Respondent details

**Comment ID number:** PDSP.049.001

**What is your Name:** nineteen47!

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

nineteen47

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

Jonathan Harrison

### Document

**Which document to you wish to make a representation on:**

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

**Which section of the document is your representation on:**

Chapter 4: Sheffield's Sub-Area Strategy

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

N/A

### Representation

**Do you consider the Local Plan is legally compliant:** Yes

**Do you consider the Local Plan is sound:** No

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

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

In accordance with paragraph 35 of the National Planning Policy Framework (NPPF), local plans must be considered against the four tests of soundness; Positively Prepared, Justified, Effective and Consistent with National Policy. This representation is submitted as the Local Plan is not considered to be justified in relation to the omission of land adjacent to Old Hay Lane, Totely. The evidence base to inform the Local Plan has not assessed the site and its ability to support the housing delivery of Sheffield and specifically, alleviate the demand in the southwest. The Local Plan has therefore not assessed reasonable alternatives in order to support an appropriate strategy towards a justified local plan.

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

Please refer to the Cover Letter provided in support of this representation.

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

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

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

Attendance is requested in order to present evidence with respect to our representation and to cross-examine the council's evidence.

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** Local Plan Representation - Objection to Plan - Southwest Subarea  
**Date:** 20 February 2023 13:25:11  
**Attachments:** [image001.jpg](#)  
[image002.jpg](#)  
[image003.png](#)  
[image004.jpg](#)  
[image005.png](#)  
[image006.png](#)  
[image007.jpg](#)  
[image008.png](#)  
[Your response on Draft Local Plan.msg](#)  
[Land adjacent Old Hay Lane Sheffield - Objection Final.pdf](#)

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Hello,

Following the comments submitted on the online form, a copy of which is attached, please also find the supporting cover letter which provides further detail to the representation we have made.

Any questions on this, please feel free to get in touch.

Kind regards,

Georgia Parker

Planner



w: [www.nineteen47.co.uk](http://www.nineteen47.co.uk)

Sheffield Office: Acero | 1 Concourse Way | Sheffield | S1 2BJ

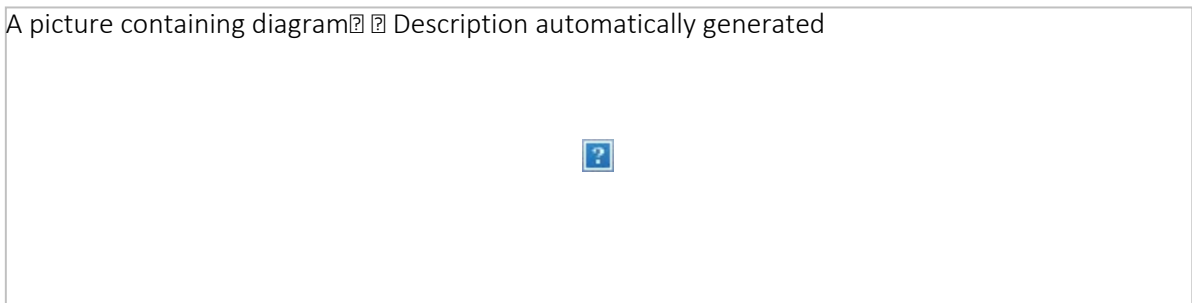
Midlands Office: Unit 4 | Innovate Mews | Lake View Drive | Sherwood Park | Nottingham | NG15

OEA

York Office: Unit B | Ryedale House | 58-60 Piccadilly | York | YO1 9NX

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A picture containing diagram? ? Description automatically generated



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Piccadilly | York | YO1 9NX. Registered in England Company Number 9875776.

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** Your response on Draft Local Plan  
**Date:** 20 February 2023 13:19:10

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## Have Your Say Sheffield

Hi nineteen47!,

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

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

nineteen47

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

Jonathan Harrison

**Which document do you wish to make a representation on?**

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

**Which section of the document is your representation on?**

Chapter 4: Sheffield's Sub-Area Strategy

**Do you consider the Local Plan is legally compliant?**

Yes

**Do you consider the Local Plan is sound?**

No

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

Yes

**Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its**

**compliance with the duty to co-operate, please also use this box to set out your comments.**

In accordance with paragraph 35 of the National Planning Policy Framework (NPPF), local plans must be considered against the four tests of soundness; Positively Prepared, Justified, Effective and Consistent with National Policy. This representation is submitted as the Local Plan is not considered to be justified in relation to the omission of land adjacent to Old Hay Lane, Totely. The evidence base to inform the Local Plan has not assessed the site and its ability to support the housing delivery of Sheffield and specifically, alleviate the demand in the southwest. The Local Plan has therefore not assessed reasonable alternatives in order to support an appropriate strategy towards a justified local plan.

**Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Please refer to the Cover Letter provided in support of this representation.

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

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

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

Attendance is requested in order to present evidence with respect to our representation and to cross-examine the council's evidence.

Thank you,  
Sheffield City Council

## Other projects that might interest you

Sheffield City Partnership Board Equality Monitoring  
Project for Sheffield City Partnership Board members and presenters.  
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GP/01/n2105

Head of Planning  
Sheffield City Council  
Howden House  
1 Union Street  
Sheffield  
S1 2SH

20<sup>th</sup> February 2023

Dear Sir/Madam,

**Re: Representation on Sheffield Local Plan Preferred Options Consultation.**

nineteen47 are instructed by Jonathan Harrison in relation to land adjacent to Old Hay Road, Totley, Sheffield. This representation presents a holding objection to the inclusion of the land within the Green Belt and the omission of the site as a housing allocation. This representation includes land within Mr Harrison's ownership and also neighbouring land within the ownership of HFT Ltd. Both sites have been previously promoted for development as part of the preparation of the new Local Plan and remain available, deliverable and suitable for development.

This letter will briefly outline the context of the site, including the reason why we consider the draft plan in its current form to be unsound.

**Site and Planning Context**

The site comprises 3.16ha of greenfield land on the western edge of Totley Brook in southwest Sheffield (see Figure 1).



Figure 1 The Site Plan

The site area includes two rectangular fields of grassland that have not been previously developed and to the north east corner The Elms Care Home, which comprises a range of buildings and associated garden land. The site is accessed off Old Hay Lane to the north. It slopes downwards from north to south and is defined by Old Hay Lane to the north and west, existing residential development to the east and woodland to the south.



The site is well-defined by existing physical boundary features and directly adjoins the existing urban area in this part of Sheffield. The site's western boundary in particular includes a well-screened boundary to the adjacent countryside, minimising views from the wider area.

The site is currently located within the Green Belt as defined in the Sheffield UDP (1998). The site has been promoted previously on behalf of both landowners for residential development with an indicated suggested yield of 75 dwellings. As part of the evidence base, the 2015 HELAA identified the site under reference SO2442, but did not provide a detailed site assessment on the basis that the site was located in the Green Belt and therefore would not be suitable. As the 2020 Green Belt Review did not remove any land from the Green Belt, the site was not included in the 2020 Sheffield Housing and Economic Land Availability Assessment Report (HELAA), which has informed the emerging Local Plan.

Notwithstanding the omission from the latest HELAA and the draft Local Plan, the site is considered to be suitable and deliverable to support residential development. The land is immediately available and would therefore be deliverable within 5 years of the plan period. For the reasons set out in previous representations regarding the site, the land is not considered to strongly support the purposes of including land within the Green Belt. The development of the site will not lead to unrestricted sprawl or the merging of neighbouring towns. It will not impact historic towns and will the wider countryside will continue to be safeguarded following any development.

The site offers the potential to development not only market and affordable housing but potentially older person accommodation linked to HFT's involvement in this area. The site is sustainably located in close proximity to Dore local centre and offers the opportunity to provide biodiversity enhancements as part of any development proposals for the site.

### Policy Objection

In accordance with paragraph 35 of the National Planning Policy Framework (NPPF), local plans must be considered against the four tests of soundness; *Positively Prepared, Justified, Effective* and *Consistent with National Policy*. This representation is submitted as the Local Plan is not considered to be **justified** in relation to the omission of land adjacent to Old Hay Lane, Totely. The evidence base to inform the Local Plan has not assessed the site and its ability to support the housing delivery of Sheffield and specifically, alleviate the demand in the southwest. The Local Plan has therefore not assessed reasonable alternatives in order to support an appropriate strategy towards a **justified** local plan.

**Policy SA7** regarding Southwest Sheffield Sub-Area Site Allocations sets out those sites that will be allocated for housing within this sub-area. This letter presents a **holding objection** to Policy SA7 due to the omission of Old Hay Lane, Sheffield as a housing allocation. The draft Local Plan makes only one allocation for housing in Dore, on site ref SWS11 for a total of 14 dwellings. This is not considered to represent sufficient provision of future housing land for the plan period in this area. Dore is one of the highest value housing market areas in Sheffield and offers significant potential to make viable provision for market and affordable housing within the City. It is sustainably located with strong public transport connections via bus routes and Dore Railway Station to the City Centre and to Manchester.

The draft Local Plan does not meet the housing requirement, including 35% uplift, set out by Government and relies on a significant level of high density city centre housing delivery on brownfield sites with significant potential viability challenges. In order to make suitable provision for affordable family housing within the plan, the approach to the housing target and the associated need for a

selective Green Belt review should be revised. In this context, the draft policies should also be reviewed, including the following suggested amendment:

*Recommendation – Within Policy SA7 and the associated Policies Map, identify the above site at Old Hay Lane for housing.*

The plan should include the site as a housing allocation within the southwest Sheffield sub-area. The plan should make it clear the site is capable of delivering approximately 75 dwellings within 0-5 years of the plan being adopted.

## Summary

This letter represents a **holding objection** to the omission of Land at Old Hay Lane, Sheffield in **Policy SA7 and recommends that the site should be allocated for housing**. The inclusion of the site within the Sheffield Green Belt is also objected to on this basis. T

We trust that the above is sufficiently clear, and we reserve the right to make further representations as the draft Local Plan is taken through Examination in Public. This includes the presentation of evidence to support the above objection.

Yours faithfully



Georgia Parker  
Planner

