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Cc: [Redacted]
Subject: Submission of Representations - Land at Little London Road
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[Little London Road - Representations FINAL 200223.pdf](#)

Dear Sir / Madam,

We submit the attached representation document, on behalf of our client, Laver Regeneration Limited, in response to Sheffield City Council's Publication Draft of the Sheffield Plan: Our City, Our Future.

The submitted document relates to our client's interest in Land at Little London Road (Site Location Plan appended).

I would be grateful if you could confirm receipt of the attached representation, and should you have any questions, please do not hesitate to contact me.

Kind regards,

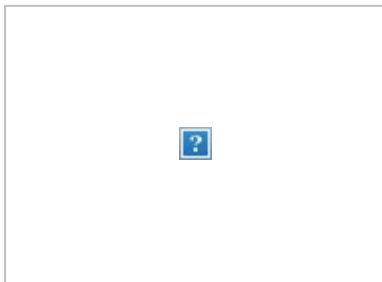
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Representations to the Publication Draft of the Sheffield Plan: Our City, Our Future

Land at Little London Road

On behalf of Laver Regeneration Limited
February 2023

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APPENDICES

APPENDIX 1 – Site Location Plan

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Version FINAL

Date: February 2023

1 INTRODUCTION

- 1.1 These representations have been prepared by Asteer Planning LLP ('Asteer') on behalf of Laver Regeneration Limited ('Laver') in response to Sheffield City Council's ('SCC') Publication Draft of the Sheffield Plan: Our City, Our Future ('Publication Plan').
- 1.2 These representations have been prepared in the context of Laver's interest in land at Little London Road ('the site'). A Site Location Plan is contained at **Appendix 1**.
- 1.3 These representations are structured as follows:
- **Chapter 2** sets out the background to the site, including its location, characteristics, and planning history;
 - **Chapter 3** sets out the site's sustainability credentials, deliverability and the benefits that its delivery for housing would bring;
 - **Chapter 4** sets out Laver's comments on the Publication Plan;
 - **Chapter 5** sets out a summary and conclusions.
- 1.4 Laver respectfully request that SCC gives due consideration to these representations in the ongoing preparation of the Local Plan.

2 SITE BACKGROUND

The Site and Surrounding Area

- 2.1 The site is situated within an existing industrial location between the Nether Edge and Brincliffe areas of Sheffield, located to the north of Little London Road. In its existing form, the site is approximately 1ha in size and hosts a single storey industrial unit, with an elevated roofspace. Until recently, the site hosted an Arnold Laver timber distribution business with associated parking and storage areas, but at the time of writing is scheduled to close down and the site is now vacant.
- 2.2 Within the current Development Plan, the site is not allocated for a specific use however is located within a wider area identified as a 'Fringe Industry and Business Area'.
- 2.3 The industrial unit sits upon hardstanding with two entry and exit points in the form of a one-way access road which surrounds the site. East and south of the site are other industrial units of similar height, and a railway line which runs east to west to the south. Immediately north of the site, lies the River Sheaf which meanders around the unit. Beyond the river, are traditional two storey terraced houses and Abbeydale Road (approximately 500m to the north) which forms a key access road into the city. Some areas within the proximity are starting to deliver residential housing units in an urban neighbourhood environment.
- 2.4 A number of local amenities and facilities are located within walking distance of the site, with Abbeydale Road to the north hosting a selection of convenience stores. The Hardy Pick public house is located approximately 100m to the north west, also off Little London Road with a selection of other restaurants and pubs which are located on the junction of Abbeydale Road and Sheldon Road. Nether Edge Primary School is located approximately 270m to the north of the site. With regard to access to public transport, Abbeydale Road hosts 3 bus stops within walking distance of the site, which all benefit from services into Sheffield City Centre.
- 2.5 There are no designated heritage assets within or adjacent to the site boundary.
- 2.6 No TPOs are located or within the vicinity of the site, and no ecological designations are assigned. The majority of the site sits within Flood Zone 2.
- 2.7 There are no public rights of way within the site.

Planning History

2.8 The following planning history is deemed relevant to the site and these representations:

Reference	Description	Decision
07/04294/FUL	Use of building as Builders' Merchants including external alterations and associated works.	Approved December 2007
01/10336/CHU	Use of building for car storage and preparation.	Approved December 2003

2.9 In addition, the immediate surroundings to the site has seen recent residential development comprising:

Reference	Description	Decision
21/01636/FUL	Demolition of building and erection of 2no. three-storey buildings consisting of 14no. residential apartments with commercial premises (Class E) at ground floor, provision of undercroft car/cycle parking and associated landscaping works.	Approved October 2022.
14/03493/FUL	Change of use of former Abbey Glen Laundry building to form 20 apartments and erection of a 3 storey building to form 9 apartments, 1 live /work unit and 2 Offices and erection of 16 terraced houses/ townhouses"	Approved March 2015.

3 A SUSTAINABLE AND DELIVERABLE SITE

3.1 The site is situated within a sustainable and accessible location and comprises underutilised brownfield land. As noted within Section 2 of these representations, the site lies approximately 500m from both Abbeydale Road and Heeley, two popular community centres within the City with access to a host of shops and transport connections.

3.2 The National Planning Policy Framework ('NPPF') (2021) and the Government's growth agenda seek to ensure that sufficient land is available in the most appropriate locations to increase housing supply, support growth and boost home ownership. Importantly, this land should be deliverable. In accordance with the definition of deliverable as set out in Annex 2 of the NPPF, to be considered deliverable, sites should:

- **Be Available:** A site is considered available where there is confidence that there are no legal or ownership problems;
- **Be Suitable:** A site is considered suitable for housing development if it offers a suitable location for development and would contribute to the creation of sustainable, mixed communities; and,
- **Be Achievable:** A site is considered achievable for development where there is a reasonable prospect that housing will be developed on the site within five years. This is a judgement about the economic viability of a site and the capacity of the Developer to compete and sell housing over a certain period taking into account market factors, cost factors and delivery factors.

3.3 The site is available, suitable and achievable and is ideally positioned to contribute towards the Council's housing supply in accordance with the NPPF. The following demonstrates that the site is deliverable:

Available

3.4 The site has recently closed its operation as a timber trade counter business and is available now for redevelopment. Laver have a strong track record of delivering residential development on sustainable brownfield sites, typically with their development partner, locally based Bolsterstone Group, with quick and effective delivery through recognised funding routes and trusted consultants.

3.5 The site is therefore considered to be available in the context of the NPPF.

Suitable

3.6 The site is deemed suitable for residential development as it:

- Comprises an available brownfield site within a sustainable and accessible location;
- Redevelopment of the site would ensure a vacant and currently underutilised site is brought back into use;
- Provides a unique opportunity to provide significant environmental benefits through opening up the River Sheaf and providing improvements to this important part of the strategic green network including the potential for enhanced planting and accessible walking routes along the river;
- Sits within a sustainable location, close to a range of amenities and transport links;
- Aligns with SCC's ambition within the Publication Plan to deliver growth within existing urban areas with minimal removal of land from the Green Belt. It is a key priority of the strategy for housing growth to deliver future housing on sustainable brownfield sites within existing urban areas;
- Residential schemes are already starting to be delivered in this part of Sheffield, owing to the high quality location and local amenities;
- Has no known identified environmental constraints that would prevent the site coming forward for residential development; and,
- Is situated within a local highway network that has the capacity to accommodate the development.

Achievable

3.7 There are no site constraints that would affect the viability and/or deliverability of the site. Therefore, it is considered that the site can be viably developed.

3.8 The delivery of new homes in this location would make a positive contribution towards meeting the housing needs of the Borough.

3.9 With recent approvals for high density, residential led development within the vicinity of the site, and alongside the Laver's resources and capability to deliver such development, the site presents itself as an achievable prospect for residential development in the short term.

4 COMMENTS ON THE PUBLICATION DRAFT PLAN

Housing Delivery

- 4.1 With regard to the delivery strategy for housing within the Publication Plan, the supporting text of Policy SP1 (Spatial Strategy) states that *"...a key priority is to maximise the reuse of brownfield sites within the existing urban areas. Releasing large amounts of Green Belt land would potentially jeopardise the regeneration of brownfield sites and would lead to higher carbon emissions due to the increased need to travel."*
- 4.2 Draft Policy H1 (Scale and Supply of New Housing) notes that the target for homes be delivered on previously developed land is 85% across the plan period.
- 4.3 Draft Policy SP1 identifies a housing need of 35,530 new homes by 2039 (2,090 homes per annum). Table 1 identifies that the Council's identified supply across the plan period is 35,558 homes. No buffer is therefore proposed between need and supply.
- 4.4 Laver are generally supportive of the Council's housing delivery strategy, in particular the objective to deliver the majority of housing on sustainable brownfield sites within the urban boundary.
- 4.5 As identified, no buffer between housing need and supply is identified, and therefore it is highly likely that over the plan period not all of the identified supply will be delivered for a number of reasons, including changing market conditions, viability or other technical issues that would impact on site delivery or the assumed housing trajectory. This could result in a scenario where SCC are very likely to fall short of their delivery targets. It is therefore imperative to maximise the opportunities to develop sustainable and suitable brownfield sites for housing by allocating such sites through the plan process.
- 4.6 We note that the Publication Plan proposes to allocate a number of small-medium sized brownfield sites as 'Housing Sites' (Refs: SWS02-SWS17) within the Southwest Sheffield Sub Area (where the site is located) under Draft Policy SA7: Southwest Sheffield Sub Area.
- 4.7 As demonstrated in Section 3 of these representations, the site is a vacant brownfield site in a sustainable and accessible location which is deliverable for housing development.
- 4.8 Laver therefore respectfully requests that the site is **included under Policy SA7 as a proposed 'Housing Site'**. This allocation would provide an important contribution towards the Council's housing land supply and assist in providing a housing buffer that would mitigate against an under delivery, particularly early in the Plan Period.

Draft Policy EC3 'Development in General Employment Zones'

4.9 Within the Publication Plan, the site is not proposed to be allocated for a specific use but is proposed to be located within a wider area identified as a 'General Employment Zone'.

4.10 Draft Policy EC3 (Development in General Employment Zones) states:

"In General Employment Zones the following uses will be:

Acceptable

- *Storage and distribution (Class B8) not including open storage*
- *Hotels (Class C1) where they would comply with Policy EC6*
- *Commercial, business and service uses (Class E) – where they would comply with Policy EC5*
- *Learning and non-residential institutions (Class F1) and local community uses (Class F2) – only in locations that are accessible and where they would comply with Policies EC5 and EC6*

Unacceptable

- *Residential institutions (Class C2)*
- *Secure residential institutions (Class C2A)*
- *Dwellinghouses (Class C3)*
- *Houses in multiple occupation (Class C4)*
- *Purpose built student accommodation*

Other uses will be considered on their individual merits but will not be permitted where they would undermine the suitability of the Zone for the acceptable uses or would not comply with Policies EC5 and EC6."

4.11 The supporting texts notes at para 5.14 that: *"The General Employment Zones provide opportunity and flexibility for a wide range of business to expand, locate and relocate. However, residential uses and other sensitives uses are not appropriate in these areas due to noise, traffic or other disturbance"*

- 4.12 Laverconsider that Policy EC3 is overly restrictive and limits the possibility of development on suitable sustainable brownfield sites, particularly for residential development. It is acknowledged that some sites within the designation would be unsuitable for residential development, however this general assumption severely limits the opportunity for deliverable sites, such as the site at Little London Road, to come forward for residential development where an employment use is no longer viable.
- 4.13 With reference to comments outlined above, Policy EC3 as drafted conflicts with SCC's ambitions to deliver the majority of housing on brownfield sites within the urban area.
- 4.14 Laver consider that the policy should allow greater flexibility when it comes to permitted land uses, rather than a prescriptive list of acceptable and unacceptable uses. It is not clear from the Council's evidence how the acceptability of uses has been determined. A criteria based mechanism should be included within the policy that allows for alternative uses to come forward where the site is no longer suitable for commercial or industrial use, and where it is acceptable when tested against other policies and considerations in the plan (such as amenity). The current policy wording, which wholly prohibits residential uses within General Employment Zones, severely restricts the deliverability of suitable brownfield sites for much needed housing within the city.
- 4.15 Furthermore, the reasoning provided by the Council in the supporting text for the unsuitability of residential development in this area is noted as noise, traffic and other disturbances. While this could be applicable to some sites within predominantly industrial areas, this is not a sufficient reason to prohibit residential development and could be considered against other detailed policies in the plan, such as Policy NC14 (Safeguarding Sensitive Uses from Noise, Odours and Other Nuisance) which sets out in detail the appropriate conditions for residential development and could be used to assess residential proposals.
- 4.16 Additional technical matters should be assessed on a case-by-case basis through appropriate technical assessments and specific mitigation proposed if required.

5 SUMMARY

- 5.1 These representations have been prepared by Asteer on behalf of Laver in response to SCC's Publication Draft of the Sheffield Plan in relation to their land interest at Little London Road.
- 5.2 The site at Little London Road is a highly sustainable, vacant, brownfield site which is suitable for residential uses and meets the definition of deliverable as set out within the NPPF.
- 5.3 Laver is generally supportive of SCC's proposed spatial strategy which seeks to maximise the reuse of brownfield sites within the existing urban areas, however the Council is only identifying enough sites to just meet its housing need and there is therefore a real risk that the Council will fall short of meeting their housing targets. Little London Road offers a sustainable, brownfield site that is deliverable in the short-medium term and would build upon successful schemes already in the vicinity.
- 5.4 Laver recommends that the following amendments should be considered by the Council as the Local Plan is progressed:
- **The inclusion of the site under Policy SA7 as a proposed 'Housing Site'** – which would support the delivery of a sustainable brownfield site that could contribute towards the Council's housing land supply and mitigate against any under-delivery of the identified supply.
 - **Greater flexibility is included in Policy EC3 'Development in General Employment Zones'** - Laver consider that this policy as drafted is too prescriptive and should not expressly prohibit residential development, rather should include a mechanism for alternative uses (such as residential) to come forward in circumstances where an employment use becomes unviable and where any technical, amenity or other impacts can be adequately mitigated when such a use is considered against other development management policies in the plan, and the site characteristics.
- 5.5 Laver would like to reserve the right to appear in person at the Examination in Public into the Local Plan.

APPENDIX 1 – SITE LOCATION PLAN



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