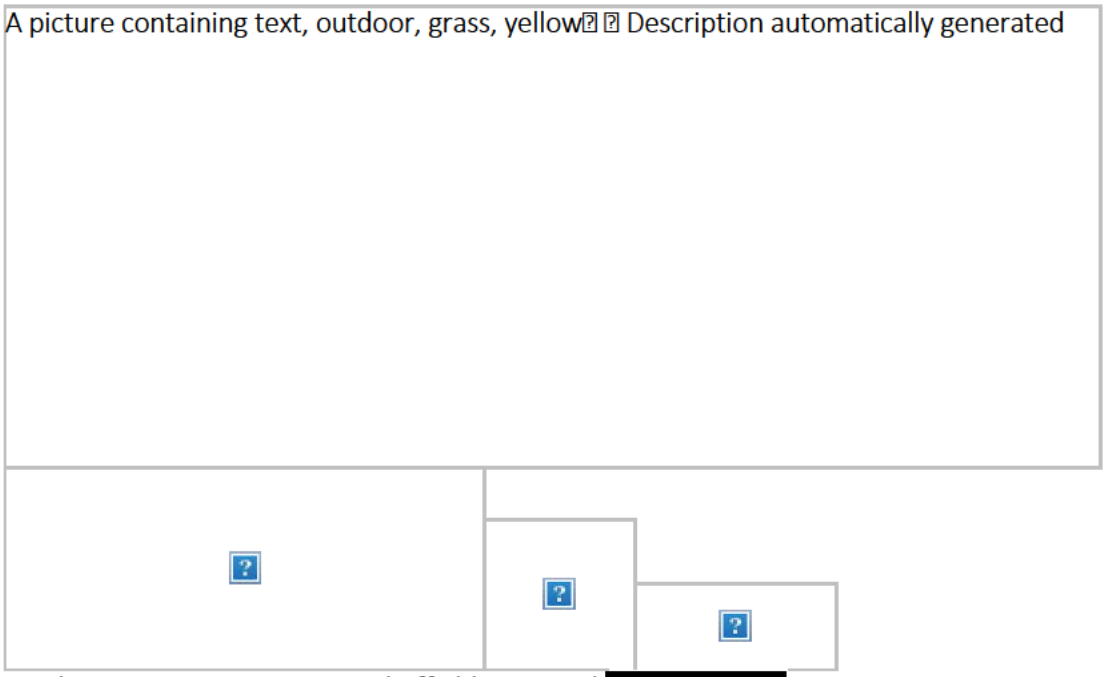
From: [redacted]
To:
Subject: Representations to the Draft Local Plan
Date: 20 February 2023 13:13:49
Attachments: image005.png
image006.jpg
image007.png
image008.jpg
CD R 0223 - SCC Draft Local Plan - Land North and East of Myers Grove Lane Malin Bridge.pdf
Part B Forms - Quinta Developments Limited.pdf
Part B Forms - Hartwood Estates.pdf
CD R 0223 - SCC Draft Local Plan - Land Adjacent Moor Valley Mosborough.pdf
CD R 0223 - SCC Draft Local Plan - Totley Hall Road.pdf
Part B Forms - Sheffield Hallam University.pdf
CD R 0223 - SCC Draft Local Plan - Loicher Lane.pdf
Part B Forms - Aldene Developments Limited.pdf
Part B Forms - Heritage Estates (Yorkshire) Limited.pdf
Part B Forms - MHH Contracting.pdf
Rep Form Part A - Urbana.pdf
CD R 0223 - SCC Draft Local Plan - Long Lane.pdf
CD R 0223 - SCC Draft Local Plan - Aldene Road.pdf
CD R 0223 - SCC Draft Local Plan - SHU PBSA + Innovation.pdf

Good afternoon,
As per the subject above please find attached the following as submission to the current consultation:

- Consultation form Part A
- Consultation form Part B filled out for the following parties:
    1. Hartwood Estates
    2. Quinta Developments
    3. Sheffield Hallam University
    4. Aldene Developments Limited
    5. MHH Contracting Limited
    6. Heritage Estates (Yorkshire) Limited
- Corresponding representations relating to land/sites listed as follows:
    1. Land adj Moor Valley, Mosborough
    2. Land N and E of Myers grove Lane, Malin Bridge
    3. Land at Totley Hall Road, Totley
    4. Land NE of Aldene Road, Wadsley
    5. Land S of Loicher Lane
    6. Land E of Long Lane, Worrall
- A separate representation from Sheffield Hallam University relating to PBSA and the Sheffield Innovation Spine, not related to a specific site.

I would be grateful of confirmation of receipt (and acceptance of representations) by return.
Kind regards,
Charles Dunn
Director



Steel City House, West Street, Sheffield, S1 2GQ | [redacted]
Wool & Tailor Building, 10-12 Alie Street, London, E1 8DE | [redacted]
[redacted]

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: CHARLES DUNN

[redacted]

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):
Address:
Postcode:
Tel:
Fax:
Email:

2. Agent Details (if applicable)

Agent: CHARLES DUNN
Organisation (if applicable): URBANA
Address: STEEL CITY HOUSE, 2 WEST ST, SHEFFIELD
Postcode: S1 2GQ

[redacted]

Part B - Your representation

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

Name or Organisation: OBO MHH Contracting

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

Policy Number: Various.
Paragraph Number: Various.
Policies Map: Multiple, with focus on Central Area Map showing allocations.

2. **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	☐

3. **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 accompanying representation document.

Continue on a separate sheet if necessary

4. **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.

Please refer to accompanying representation document.

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.

5. **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 ☐

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

Our representations drive at the heart of the degree to which the Draft Plan might be considered sound or unsound. There is a strong degree of relevance to the nuances as to what level of housing need should be provided for by the Plan, the implications on this of emerging changes to national policy, whether or not exceptional circumstances exist to justify an alternative spatial strategy, and whether the Plan will ultimately deliver for the city.

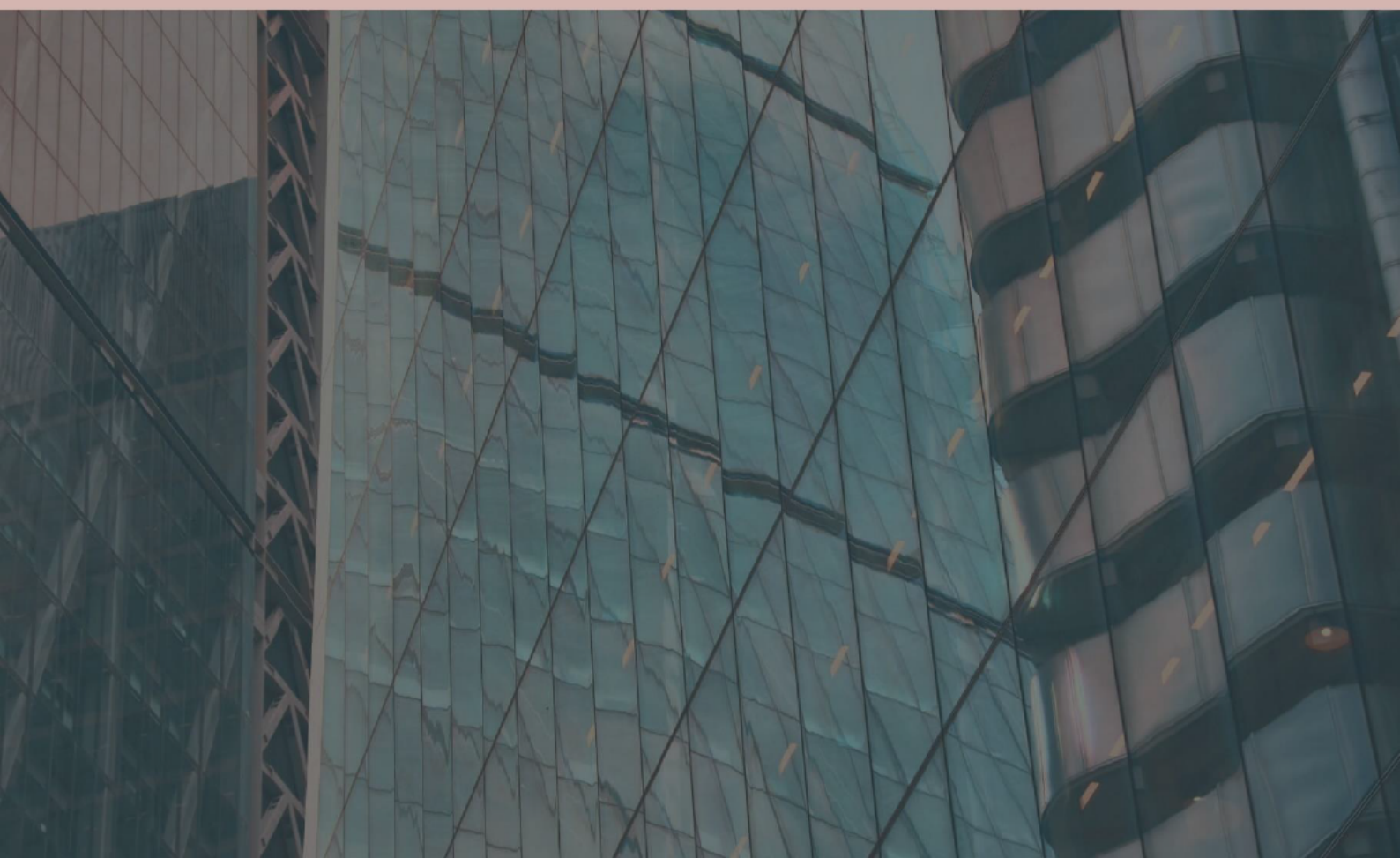
We have closely examined the reasoning behind the Council's intended approach and different elements of the underlying evidence. We have also referred to specific professional knowledge of the above factors and of specific sites and planning/development activity in Sheffield that will impact the deliverability and ultimately the effectiveness of the Plan.

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.

URBANA

SUBMISSION TO REGULATION 19 CONSULTATION ON THE EMERGING DRAFT SHEFFIELD PLAN

Land South of Loicher Lane
Ecclesfield, Sheffield



Prepared by: CD/MB
Checked and approved by: CD
Client: MHH Contracting Limited
Date: February 2023
Submitted to: Sheffield City Council

REPRESENTATION AND SUPPORTING STATEMENT FOR LAND SOUTH OF LOICHER LANE, ECCLESFIELD, SHEFFIELD

Regulation 19 consultation on Sheffield City Council's emerging Draft Local Plan

1.0 INTRODUCTION

1.1 In reference to the current stage of Sheffield City Council's Draft Local Plan, the following representation is prepared by Urbana on behalf of our client, MHH Contracting Limited, to promote land south of Loicher Lane in Ecclesfield, Sheffield (hereafter referred to as 'the site'), for release from the Green Belt and allocation for residential development.

1.2 We understand that preceding the Draft Plan, Sheffield City Council have undertaken a lengthy Call for Sites process (with a focus on Brownfield land) as well as an Issues and Options consultation designed to test a number of different Spatial Options. We agree that not all of the sites that were promoted through these processes will be suitable, achievable and available, but in contrast to the Spatial Option taken forward by the Council strongly consider that the future housing needs of the area can only be met through a varied approach to development across sustainable sites both Brown- and Greenfield.

1.3 This site was previously promoted through the Citywide Options for Growth consultation which concluded in January 2016. The consultation was in support of a previous Local Plan update that was subsequently abandoned and has since been replaced with the current Emerging Local Plan, which has been informed by an Issues and Options consultation held in 2020. Whilst the resultant draft plan confirms the Council's intention to pursue a growth strategy that prioritises the redevelopment of previously developed land in the built-up urban area, this document sets out the site's continued suitability in the face of various constraints that the Council's intended strategy will face.

1.4 In line with the methodology which the Council has used to assess land through previous stages of consultation on the emerging Plan, including the Call for Sites process, this document asserts the subject site's suitability, availability and achievability (including viability) to accommodate development.

1.5 Critically, this is set out against the backdrop of an assessment of the specific spatial approach taken in the Draft Plan, with analysis of specific policies and allocations, its deliverability and its implications on Sheffield's ability to deliver for its housing need, its economic growth and the future prosperity and vitality of the city. Accordingly, each point of analysis feeds into conclusions as to

the Plan's conformity with the NPPF and Planning Practice Guidance, and ultimately on the soundness of the Draft Plan in its current form.

1.6 The conclusion is drawn that the current form of the emerging Plan critically fails in a number of respects, and that as part of a successful response to dealing with these failures, the site in question is not only suitable for allocation for resident development, but that it is necessary the site comes forward for residential development in order for the emerging Local Plan to be delivered in a positive way and also to make sure that the Council can meet its identified housing targets in the plan period.

2.0 SITE INTRODUCTION AND DEVELOPMENT POTENTIAL

2.1 The site, shown in the aerial image above, comprises an area of approximately 2.26 heactares and is located in Green Belt land adjacent to a General Industry Area (as defined by Sheffield's Unitary Development Plan) that is loosely formed around Station Road and Butterthwaite Lane.

2.2 Despite this proximity of policy areas, physically the site does not directly relate to this area and is in fact approximately 100 metres from the closest industrial units to the west and south-west, with an area of greenfield land acting as a buffer of sorts.

2.3 To the east and north of the site is bounded by open greenfield land that is referred to as Butterthwiate Farm, and to the north-west by an electricity substation.

2.4 Access to the site is readily available via Loicher Lane which, though relatively narrow, is easily capable of accommodating two-way traffic and is served by a footpath. The site is served by various shops as well as a wide range of other amenities and services formed around The Common and Station Road, within 500 metres.

2.5 As will be set out in further detail in the following sections of this document, the bringing forward of this site through the emerging Local Plan will not only assist in the delivery of much-needed housing in a suitable location in close proximity to the built-up area of Ecclesfield, but it will stand to have wider benefits for the locality pursuant to the long-term sustainability of Sheffield as a city.

3.0 CURRENT PLANNING POLICY CONTEXT

Adopted Plan

3.1 In order to fully analyse the content of the consultation documentation, it is important to understand the existing context in the form of adopted planning policy. Sheffield's adopted development plan comprises the 2009 Sheffield Core Strategy and the saved policies of the 1998 Unitary Development Plan, including the older Proposals Maps and Allocations from the latter.

3.2 Subsequently to these adopted documents -and prior to and around the emergence of the NPPF- the Council formulated its City Policies and Sites document, which included replacement Proposals Maps with site allocations, and represented a more up-to-date indication of spatial and land use thinking at that time. However, the Council's work on this was abandoned after the decision was taken in December 2013 to begin work on a wholly new Plan, which is now finally beginning to emerge in greater substance in the form of course of the current Draft Plan consultation.

3.3 More specifically, the approach taken towards development in these documents that form the adopted development plan is important in understanding the merits of the emerging Draft Plan. For instance, in describing the spatial strategy taken in the UDP, SCC outlined:

- *'[The] guiding principles all point to a central theme of the Plan which is regeneration.'*
- *'Development will be encouraged on unused and under-used sites within the main urban area.'*
- *'An increasing share of [housing] sites will be in the Inner City, including the East End, and in the City Centre.'*
- *'The emphasis on regenerating the built-up areas means keeping a firm Green Belt and so the outer limits of the urban areas will not change much in most parts of the City.'*

3.4 Similarly, the following quotes are from the spatial strategy set out within the Core Strategy:

- *'New development will be concentrated in the main urban area of Sheffield [...] and will take place mainly on previously developed land.'*
- *'Densities will be increased within the existing built-up areas rather than spreading out into the surrounding countryside, which will remain protected as Green Belt.'*

3.5 This makes clear that adopted policy did not make any meaningful attempt to identify new residential land for the delivery of family housing, or to examine the undertaking of a Green Belt Review that would most likely have been necessary in order to achieve this. In this way, as will be set out in greater detail over the course of this representation, it can be seen that there is little meaningful difference in the spatial strategy pursued decades ago than that being put forward now.

3.6 With this in mind, this context should also be considered against the state of housing land supply and delivery over recent years. Relevant statistics in this respect are included in the in following section of discussion, and these very firmly evidence Sheffield's failure to deliver housing of the type and at the scale necessary to meet the city's need. From this, what can be very strongly inferred is that the spatial approach taken historically in adopted policy was ineffective and incapable of delivering for the city. Consequently, and especially given the parallels in spatial strategy, this has significant implications for the appropriateness of the emerging Plan, as set out in the following sections of discussion.

Housing Land Supply and Delivery

3.7 Looking forward, Sheffield City Council currently does not have an up-to-date 5 Year Housing Land Supply. The LPA now acknowledges this fact following certain notable Appeal determinations by the Planning Inspectorate. Accordingly, the position that SCC accepts is that as of a base date of 1 April 2022, a housing land supply of just 3.63 years exists for the period 2022/23 to 2026/27.

3.8 SCC also accepts that this is a drop-off from their previous position of a 4.0 year supply, which itself was a substantial fall from a previous claim of 5.4 years, which erroneously relied upon the supply deriving from purpose-built student accommodation. A high-level overview of this situation, and the nature of the land supply that does remain (i.e. heavily dependent on apartment-based development that is typically more challenging in terms of financial viability), allows for the following conclusion to be drawn:

- The current housing market and wider economic picture (increasing interest rates, increasing build costs, reducing residential values, etc) means that:
  - It can be reasonably expected that a further re-examination of the relevant sites currently forming part of the housing land supply would most likely result in a reduced figure owing to lack of financial viability; and,
  - For the same economic reasons, it can be reasonably expected that in the short and medium terms as sites fall out of the housing land supply, the supply of new

sites entering into it will be reduced accordingly, resulting in a figure diminishing over time.

3.9 This suggests that even the 3.63 years currently claimed is likely to be an overestimate, or if not then it is likely to shrink rather than grow at least in the short to medium term.

3.10 While this situation is doubtless partly a result of the lack of an up-to-date Local Plan and a lack of suitable residential allocations, as made clear above it is also intimately connected to the wider economic and financial viability situation in the city relating to land that is currently available for residential development. That is -in accordance with spatial strategies past and future- that fact that the vast majority of land available for the delivery of residential development is brownfield in nature. While this does of course have numerous merits in terms of laudable sustainability and regeneration objectives, the mathematics that sit behind this context (in terms of land values, remediation costs, building costs, density and height-restricting planning policy, etc, that all impinge upon brownfield sites) restricts, and in many scenarios totally precludes, the ultimate delivery of such sites for development.

3.11 The implications of this situation on housing land supply are even wider, in that it doesn't simply reduce the quantum of supply, but coupled with the Council's largely unchanging spatial strategies, it also specifically constrains the delivery of larger dwellings and in particular family housing. This is a natural economic consequence of this context: with housing land supply so lacking, and so restricted to mostly centrally-located brownfield sites, that which does exist demands development at an intensified scale and typological concentration in order to be financially viable to deliver.

3.12 With this being said, it should also be acknowledged that in recent years Sheffield has delivered marginally more dwellings than the city's requirement as per the Housing Delivery Test (6,909 dwellings delivered vs 5,461 required in the years 2018/19 to 2020/21). However, this rate of delivery (averaged out to 2,303 dpa delivered vs 1,820 dpa required) still falls some way short of the requirement set out by the standard method with its additional 35% largest urban area uplift, which prompts a figure for Sheffield of 2,972 dpa.

3.13 The specific manner and timescales of delivery is also of important relevance here, as of the above delivery, a disproportionate number (3,083 dwellings) was achieved within a single year (2019-20), with a drop of to 1,850 the following year. As described above, it is considered highly likely that market conditions are causing a shrink in dwelling delivery and this is borne out by DLUHC data which identifies that more recently over the delivery year 2021/22, Sheffield suffered a further reduction to 1,774 net additional dwellings (*DLUHC Live Table 122 'Net additional dwellings by local*

authority district, England 2001-02 to 2021-22'). This makes the prospect of new Housing Delivery Test results finding that Sheffield is not delivering its need very likely.

3.14 Furthermore, *and most critically*, this delivery has been staggeringly unbalanced in terms of the type and size of dwellings achieved. Taking figures from the Council's 2019 Housing Completions Report, it is identified that over its five-year data period just 25% of dwellings built in the city were houses, with the vast majority being apartments or student accommodation. This must be compared to SCC's 2019 Strategic Housing Market Assessment, which makes clear that over 80% of dwelling demand by type is for houses or other non-flat dwellings.

3.15 This issue can be seen reflected in future supply too, with the 2020 HELAA identifying that 72% of future supply over the forthcoming five years will comprise of apartments and purpose-built student accommodation (cluster flats). Data also shows the geographical dysfunction of this supply, with 70% of all dwelling completions from 2015-2020 being located in just two areas: the City Centre and City Centre West.

3.16 As a result of the previous paragraphs of discussion it can only be concluded that the current planning policy context and spatial strategy has overwhelmingly failed to deliver the homes and growth that Sheffield needs – both according to statistical requirements and to the aspirations of the city to grow and prosper.

3.17 As indicated previously, and as explained in much more detail over the following sections of this representation, the policy approach and spatial strategy now being pushed by the Draft Local Plan does not represent any meaningful change to the ineffective incumbent. This will likely result in further failure for Sheffield and failure of the Plan itself in being found sound by the Planning Inspectorate, and the following analysis will now show.

4.0 SOUNDNESS OF DRAFT LOCAL PLAN

4.1 As the above discussion establishes a very worrying existing context for the delivery of Sheffield's housing and development need within its extant planning policy context, the following discussion now proceeds to examine the Draft Plan itself, with several topics being examined with conclusions drawn as to their implications on the overall soundness of the Plan in its current form.

4.2 The National Planning Policy Framework establishes that the examination of Local Plans is undertaken to assess whether they have been prepared in accordance with legal and procedural requirements (e.g. the Duty to Cooperate), as well as whether they are sound.

4.3 The Framework describes that Plans are 'sound' if they are:

a) *Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs[21]; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*

b) *Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

c) *Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*

d) *Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.*

[21] *Where this relates to housing, such needs should be assessed using a clear and justified method, as set out in paragraph 60 of the Framework.*

4.4 As alluded to in the preceding section, much of the following discussion revolves around the central principle of the proposed spatial strategy to choose not to deliver any new growth within the Green Belt surrounding the city (with one relatively minor brownfield site as an exception). Ultimately, as per the following quote from Officers' report to the Transport, Regeneration and Climate Policy Committee: *'exceptional circumstances are needed to alter the boundary of the Green Belt but*

Members concluded that those circumstances do not exist to justify the removal of greenfield land from the Green Belt.'

4.5 Accordingly, it is our position that such a fundamental underlying flaw in the emerging Plan has ramifications for the document across all of the tests of soundness as set out above. Our assertions in this respect are broken down thematically as follows.

Sheffield's Housing Need

4.6 Sheffield City Council have been in the process of producing their new Local Plan for several years. Prior to the current consultation, the 2020 Issues and Options document was brought forward in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. As part of this stage of consultation the Council did acknowledge that determining and delivering the city's objectively assessed need for housing must be informed by the Government's Standard Methodology ('standard method'), which at the time derived a figure of 39,330 dwellings (rounded up to 40,000) over the 18-year plan period from 2020-2038 (2,222 dwellings per annum).

4.7 In December 2020 the Government issued a revised Standard Method, which added the '35% uplift' to need figures for the county's 20 largest urban areas. This includes Sheffield, and consequently the objectively assessed housing need for the city as per the Standard Method increased to over 53,500 dwellings over an 18-year plan period 2021-2039 (2,972 dwellings per annum). Taking a more contemporary view, April 2022 figures from the Office for National Statistics showing housing affordability ratios for the calendar year 2021 determine a slight worsening in Sheffield, with the ratio increasing from 5.8 to 6.1 (ratio of median annual earnings and median property price).

4.8 The consequence of this as it relates to the workings of the Standard Method, within which 'step 2' of the formula is an adjustment to account for local housing affordability, is that Sheffield's overall need is increased from that previously recognised by SCC, to a figure of 54,324 dwellings, or 3,018 dwellings for annum for an 18-year plan period. This is the baseline figure at which the Plan must drive and from which any deviation must, in accordance with current policy, be thoroughly and exceptionally justified.

4.9 It is within this context that the Draft Plan proposes to deliver a total of 35,700 dwellings over the adjusted 17-year 2022-2039 period, equating to just 2,100 dwellings per annum.

4.10 When setting this out in the emerging Plan, Sheffield City Council recognises ongoing demographic shifts and the intense affordability crisis that is resulting in increasing homelessness, overcrowding

and ever-lengthening council housing waiting lists, and accordingly must acknowledge the knock-on effects of these issues to economic prosperity, mental and physical health and general wellbeing of residents of the city. Nevertheless, the Council has chosen to restrict the scope of dwelling delivery in the Plan to a scale that it believes can be accommodated on almost exclusively brownfield sites.

4.11 As introduced previously in paragraph 4.4, the Council recognises that the justification for this choice must be assessed against the NPPF in its current form in terms of its requirement for Plans to, as a minimum, provide for objectively assessed needs for housing. The NPPF does allow for lower levels of growth to be provided for in circumstances where a neighbouring area can help to accommodate it (which is not the case here), and where meeting the full need would harm certain assets of particular importance, including areas of Green Belt.

4.12 With respect to this latter point, it is acknowledged that the presence of Green Belt (and land afforded similar protection) is indeed a valid reason not to provide for full objectively assessed needs. However, it must be stressed that almost universally, where this has been accepted as a sound by the Planning Inspectorate at Examination, Local Authorities have undertaken full and detailed reviews of their Green Belt in order to determine how far it may be possible to accommodate growth on, perhaps just a small number, of greenfield Green Belt sites. An approach to plan-making that doesn't *seek* a reasonable exploration of the suitability of poorly functioning Green Belt sites simply cannot be considered to be positively prepared. This specific point is expanded on in further detail later in this representation.

4.13 In conjunction with this 'capacity-led' approach, Sheffield City Council is also making the claim that the Draft Plan's proposal to provide only for such a low figure can be justified through a position that this number is a more appropriate response to demographic forecasts for the city, and that it is all that is required to support the economic needs of the city, as indicated in the Sheffield City Region Strategic Economic Plan (SEP).

4.14 To address these points, firstly, with respect to the LPA's position on demographics, it must be accepted that this is based on a slower historic rate of population growth in Sheffield than would otherwise prompt the level of need that the Standard Method results in. This is identified by Iceni Projects' July 2021 Housing, Economic Growth and Demographic Modelling Report (HEGDMR) for SCC, which makes the case that the Standard Method's 2,923 dpa growth figure (now 3,018 dpa) would correspond to an increase in population of 16.2% over the plan period (due principally to higher levels of migration), as opposed to the 7.7% increase anticipated by 2018-based subnational population projections.

4.15 While the figures are not disputed here, there is a logical fallacy in this approach that results in the danger of 'baking in' a lower level of growth than would otherwise be seen by the city. That is, as shown in earlier sections of discussion, the quantum and typologies of new dwellings in the city has failed to meet market demand in recent years and more broadly over the course of the extant UDP and Core Strategy plan period(s). Accordingly, the fact that there is in Sheffield significant latent housing demand also indicates the existence of latent potential for population growth. SCC is therefore proposing to reduce the number of dwellings the Plan will provide for, based on demographic growth figures (i.e., just 7.7%) that have already been suppressed by insufficient historic dwelling delivery.

4.16 This creates the potential for a vicious cycle of under delivery and reduced growth. The very same principle (the danger of 'baking in' under delivery) is the reason why typically more recent subnational household projections are either discounted or adjusted (as in the case of the 2021 HEGDMR): to avoid 'baking in' suppression of household formation. This danger exists in the approach SCC is taking from the HEGDMR's conclusions.

4.17 Parallel to this, SCC's position is also reliant on the HEGDMR's finding that extrapolating from past trends in jobs growth broadly aligns with the SEP's policy-on scenario, and that the labour supply increase linked to this particular forecast suggests a need of up 2,323 dwellings per annum (subject to commuting patterns). Even disregarding the Standard Method for a moment, this figure still exceeds that which the Draft Plan proposes to work to (2,100 dpa), once again indicating that it is insufficient.

4.18 More broadly, when considering the validity of this data in feeding into the proposed level of housing to be provided for the in the Draft Plan, first and foremost it must be considered against the fact that the Standard Method 'is what it is'. It does not include an allowance for regressive speculation as to an area's job growth statistics to mean that the 35% urban uplift can be discounted. Indeed, the HEDGMR clearly acknowledges that this is the case (p.26). Moreover, with respect to the differences in population growth discussed above in paragraph 4.14, this is indeed the purpose of the Standard Method's 35% uplift: to direct higher levels of growth to the country's largest urban areas, which are more appropriate locations to accommodate such growth than more remote or rural local authority areas. This is therefore not a flaw to pick at, but an intended feature.

4.19 The LPA is therefore not justified in seeking to utilise this data to push back against the requirements of the Standard Method, but even if they were, it has been shown that they are <u>still</u> not seeking to provide for a suitable rate of dwelling growth at a level that may still be necessary as identified in their own HEDGMR – the 2,323 dpa vs. 2,100 dpa figures referred to above.

4.20 Therefore, the following assertions are made with respect to the Draft Plan as it relates to its proposed strategy to providing for housing need:

- It is not consistent with national policy, as it does not accord with the policies and requirements of the NPPF as they relate to the plan making process.
- It is not positively prepared, as it does not even try to seek to meet the city's objectively assessed needs.
- It is not justified, as it proposes a strategy that derives from a plan making approach that is not positively prepared, and is therefore not an appropriate strategy.

4.21 It is therefore demonstrably unsound.

Results and Implications of Recent Dwelling Delivery and the Housing Delivery Test

4.22 As explained previously in paragraphs 3.12 – 3.14, looking at past delivery Housing Delivery Test figures for Sheffield do indicate that the LPA has marginally fulfilled its needs. However, these figures do not account for the 35% uplift and are based solely on a shallow quantum-based assessment.

4.23 Critically, with that in mind this previous discussion also shows that the nature, typology and location of the dwellings delivered is extraordinarily misaligned with actual demand. Beyond this, it is also shown that there is growing risk -even under the limited testing scenario of the HDT- of Sheffield becoming likely to fail the Test over the coming years. This is principally due to market conditions, which are already extremely challenging and are likely to become even more so over the short term, especially when subject to future policy requirements of the Draft Plan, as is explained in a later section of this representation.

4.24 This situation presents greater reasoning as to why the quantum and typology of housing to be provided for by the Draft Plan needs much greater consideration. It means that it is paramount that the Local Plan identifies and allocates more suitable and more achievable sites to create a supply of homes that can be *delivered* to cater for the actual, objectively assessed, needs of the city.

4.25 Accordingly, and parallel to the conclusions above in paragraph 4.20, this means that the emerging Plan in its current form is unsound due to it not seeking to meet objectively assessed needs, not being deliverable over the plan period, and therefore not positively prepared or effective.

The Status Quo

4.26 As set out in discussion of current context, status quo is a failure to the city …. And, below….

4.27 Not positively prepared (or otherwise unsound?) because it doesn't effectively change anything. It is status quo. The vast majority of proposed housing allocations and other sources of housing supply will -or will not- be delivered regardless of the existence or future adoption of the Plan in its emerging form. Allocations do not change viability challenges that already exist, and given the nature of the vast majority of allocations, they do not allow for housing to be delivered where it currently cannot be, as the residential development of these sites is already acceptable in principle under current planning policy context. The Plan therefore does not meaningfully increase the likelihood of these sites yielding housing in terms of either planning policy or deliverability, and an assumption must be made therefore that there will be no meaningful consequential impact on the delivery of such housing, regardless of the LPA's intentions.
===== it is ineffective

Viability and Deliverability

4.28 Deliverability of pathfinder/focus areas, e.g. furnace hill – language used, 'scale/heights that respect the conservation area' etc - - huge amount of experience, examples in the public sphere, or development approved but not taken forward because imposing these restrictions invariably render schemes unviable financially. And for every such example, there will be a dozen more things that haven't come forward full stop because developers know that they won't be able to get permission for anything that is actually viable. *Check against whole plan viability assessment.*

Quotes from WPVA re central area:

- Private Rented Schemes, (i.e. Build to Rent) are shown as unviable.
- '**based on the initial appraisals, it is recommended thq the Council reviews the overall policy requirements. SCC should be cautious about relying on development in the lower value areas and the Central Area to deliver its housing requirement.' Lmfao**

Conversely, with respect to greenfield sites, while the report acknowledges that they are limited, it finds 'if they are to be allocated for development, then the Council can be confident that they would be deliverable and be able to deliver some affordable housing'.

4.29 Assess say 3 specific central area case study sites… with conclusions drawn == allocations and the spatial approach to delivering growth is at odds with current commercial reality.

4.30 **Worse still –** the following additional requirements and policy directions will definitively result in further marginality of individual and collective financial viability of central area sites making the overall approach once again even more divorced from the commercial reality of delivering the mooted approach to developing out the (less than actual) housing need ++miscellaeneous -- the crappy policies that will kill viability in the city centre (affordable, space standards, increased need for unit mix, etc) - in combination with sticking half the OAN there? Madness and unsound.

4.31 Whole plan viability report corroborates this in no uncertain terms. When testing a range of policy requirements ranging from 'minimum' to 'higher', covering different aspects (e.g. 2025 Part L, Biodiversity Net Gain, EV Charging, Sustainable Design, S106, and even simply the prevailing CIL charges), the Council's own evidence base finds that: 'both brownfield and greenfield development is unviable, including at a minimum policy scenario. The viability evidence suggests a zero affordable housing requirement.'

4.32 The report finds this to be the case for the following market areas: City Centre, City Centre East, North East, the Manor/Arbourthorne/GleadlessUrban West, and the be the case for brownfield development in the Stocksbridge/Deepcar, Rural Upper Don Valley and the Chapeltown/Ecclesfield areas.

4.33 With particular focus on the City Centre area, it should be understood from this that the Council's own evidence base finds that the intended approach towards providing for housing growth is not viable or deliverable in the manner proposed, and recommends that it cannot and should not be relied upon.

4.34 Evidently, in this respect, that Draft Plan is not.... And is therefore unsound in its current form.

Sustainability and Biodiversity

Remember check the sustainability appraisal testing of other spatial options.

4.35 ^>In above respect, also check general discussion RE biodiversity crisis as reasoning for selection of current spatial option. IT MAKES NO SENSE for this to be a reason to avoid GB release. Any GB site release and developed would only be allocated and permission granted if it achieves BNG (which by the time it comes around will be full legally implement +10%). Therefore releasing GB land and developing it in a policy compliant manner really should create opportunities for overall significant BNG to be achieved. Not doing so limited opportunities for biodiversity enhancement. ==== Plan in this respect is not justified, in that its overall strategy is not an appropriate strategy to meet the

needs of the city taking into account the reasonable and -as has been argued- more appropriate alternatives.

Comparable spatial approaches to GB in surrounding Las

4.36 Barnsley, Donny, Rotherham – all Plans adopted now with GB released to fulfil their respective housing need.. especially NED which has lots of non-GB land but PINS still required them to release GB land in order to deliver the right housing in the right places. The GB alone is simply not enough to justify non-delivery of OAN. All evidence makes this clear.

4.37 If SCC are saying 'well actually we don't need X housing numbers to support the job creation we anticipate. Then how is this positively prepared?! The Plan is failing to plan for growth and for economic and social strands of sustainable development if it is seeking to justify sub-OAN housing numbers on the basis of planning for poor economic performance.... Mad.

Implications of Brownfield Development Only and the Benefits of Green Belt Release

4.38 As has been set out in representations made by Urbana to previous stages of consultation, planning for the delivery of housing almost entirely within the Central Area and on brownfield sites will, very simply, not meet the need for housing in Sheffield, either in terms of quantum or typology. Aside from any of the content in the preceding discussion, this fact is evident as the LPA acknowledge that delivery of objectively assessed need defined by the Standard Method (either with or without the 35% uplift) will not be possible through the proposed spatial strategy.

4.39 With this being firmly established, it is important to note that Green Belt sites exist in sustainable locations, that are adjacent to the urban area and with good access to amenities and to sustainable public transport options. It is not that case that releasing Green Belt land for housing allocations will mean that large area of 'rural' greenfield land would be developed. It is paramount that <u>any</u> site allocated for residential development is sustainably located, and it is clear that this can be achieved on certain sites currently in the Green Belt just as it can be for more centrally-located brownfield sites.

4.40 It is clear shown that the proposed over-reliance on brownfield sites is highly likely to cause time delays for housing delivery, and under delivery in an absolute sense, meaning that Sheffield will not hit its housing targets. Brownfield land is a finite resource and as demonstrate above can be challenging to fully unlock, especially in more constrained markets. While this is largely due to economic difficulties arising from contamination and environmental issues, it is also due to land

ownership complexities, and even the unwillingness of all landowners to sell land for development – as is recognised in the Whole Plan Viability Appraisal.

4.41 It is common that greenfield sites do not face the same challenges, thus making more Green Belt sites more deliverable. In addition, it may be the case that outer-town development can be of benefit to the centre, with capital arising from this investment being reinjected into the centre itself. There also often very little clean-up costs associated with Greenfield sites, causing less delays for delivery.

4.42 Positively, development in the Green Belt would allow the Council to allocate sites in more / all market sub-areas of the authority and the expanse of land available and the ability to build-out the required number of homes would result in the creation of mixed and balanced communities with a great mix of house types, including family homes, as well as affordable housing. It is this level of contribution that can be made on a site of this scale, rather than on smaller brownfield sites.

4.43 It is clear from even a cursory examination of housing need and brownfield capacity/deliverability that exceptional circumstances exist to justify the review of the Green Belt and release of certain sites from it, as has been set out in previous representations. We agree that this is not the case for all Green Belt sites, but for more suitable sites that will have less impact on Green Belt purposes and other important and material factors, such as land at Raans Road, which adjoins the built-up area of Amersham.

5.0 SUITABILITY OF THE PROPOSED SITE

Green Belt Release

5.1 As set out, to ensure that the Emerging Local Plan is sound it is the case that where Green Belt release is required, only the most optimal sites (in terms of its performance against the purposes of Green Belt land) must be allocated for new residential development. With that context being established, it is asserted that the site in question is suitable for removal from its Green Belt designation to form part of this process.

5.2 Key in the assertion that this site should be released from its Green Belt designation is the fact that is previously developed land. Historically, the site formed part of a railway station siding and following the granting of a certificate of lawfulness for use as a scrap yard, was used for the storage, breaking and dismantling of scrap metals, plant and machinery.

5.3 Following the site's ceasing of operations as a scrap yard, the site remains vacant having been cleared of previous structures, now consisting of mixed hardstanding, scrub and recovering grassland. As such, the previous use of the site and the fact that it has yet to be regreened makes it a favourable opportunity for development. Indeed, the site does not contribute to the preservation of any special character, does not represent a significant part of a strategic gap between settlements and does not make any notable contribution to other beneficial uses of the Green Belt.

5.4 In order to help demonstrate the merits of the site for Green Belt release, and with respect to the site's Green Belt function in accordance with the five purposes of the Green Belt as set out in the NPPF, an assessment of the site and its characteristics reveals the following:

- In the wider context the site sits to the east of the railway line that denotes the fringe of Ecclesfield. Furthermore, the M1 is located approximately 500 metres to the east of the site. With regard to the potential impact of developing the site, it can be said that the M1 would provide a logical limit to development, with large expanses of green landscape to the east in the form of The Grange Golf Club and Grange Park. Therefore, despite the site being scored highly in the recent Green Belt Review in respect of its performance in checking the 'sprawl of large built-up areas', it is nevertheless considered that the major road infrastructure to the east of the site represents a more appropriate means of preventing the spread of development, particularly when assessed in the context of the site's previously developed status. Furthermore, the potential held within the site to be returned

to its previous use as a scrap yard would effectively curtail any value of its Green Belt status in this regard, particularly insofar as its impact on visual amenity.

- Development would not connect, or encroach into, a strategic gap between any settlements. It does not therefore fulfil the Green Belt purpose of 'preventing neighbouring towns merging into one another.'

- It is acknowledged that development of the site would have a degree of impact upon the Green Belt purpose of 'safeguarding' the countryside from encroachment. However, this is relatively unavoidable by virtue of the transition from urban to rural that is common in settlement fringe sites. As has been highlighted in respect of checking the unrestricted sprawl of large built-up areas, the site holds minimal amenity, landscape or aesthetic value as it currently exists as open space. The previous use of the site is such that the land in fact has negative value in terms of appearance and usability. It can be said, therefore, that development along the lines proposed can have a positive impact on the wider area

- The site is not sited in close proximity to any historical sites or settlements, such that its development would not impact upon the setting or special character of historic towns.

- The potential allocation of the site for residential development would not detract from the Green Belt purpose to assist in urban regeneration by encouraging the recycling of derelict and other existing urban land.

5.5 Further to the above assessment of the site against Green Belt purposes, the most recent Green Belt Review undertaken by Sheffield City Council shows that the 'resultant parcel' within which the site is located achieved a Green Belt score of 11 and a Green Belt Boundary score of 2. These scores demonstrate the Council's view that the site may be suitable for release due to its relatively limited Green Belt function, and reflects favourably on the justification put forward to release the site for development.

Capacity for Residential Development

5.6 As stated in section 4, one of Sheffield City Council's fundamental targets within the Draft Local Plan is the delivery of 35,700 homes across a 17-year period to 2039, which equates to 2,100 homes delivered per year.

5.7 Notwithstanding the shortfall against the objectively assessed housing targets figure that the Council have sought to justify in the Draft Plan, also highlighted in section 4 is the precarity of the

already insufficient housing land supply position to achieve the lesser housing delivery target. This precarity is attributable to a number of substantial sites with planning permission within the Council's figures that are facing issues around deliverability due to viability.

5.8 Additionally, the imbalance of the high demand for family housing and the longstanding issue of significant under delivery in favour of apartment schemes and purpose-built student accommodation (which is set to continue in the current guise of the Emerging Local Plan), further highlights how this urgent issue is certain to intensify if not addressed.

5.9 With the above in mind, the site in question has an area of approximately 2.26 hectares (as indicated by the red-line boundary provided in the images in section 2). In accordance with the aforementioned assessment of the site's Green Belt function and extrapolating the density of existing residential housing in the locality, an appropriate and efficient density of up to 35 dwellings per hectare would equate to a maximum capacity of 79 dwellings within the site.

5.10 Whilst the capacity of the site, on face value, might be considered a relatively small development opportunity, it must be considered within the context of the above highlighted issues that threaten to undermine the Council's apparent optimism with regards to the prospects of the Draft Local Plan's soundness. If the concerns raised with regard to the Draft Local Plan are borne out in the pending independent examination, it will serve to emphasise the suitability and sustainability of the site for residential development.

5.11 Equally, in line with the prevailing character of residential development in the area, the site can deliver family housing that has proved, and will continue to prove (if not urgently addressed in the Emerging Local Plan), elusive in Sheffield as evidenced by delivery statistics. This is an element of the housing market that cannot be ignored if the city hopes to fulfil its economic and employment goals, and it is therefore vital in order to achieve 'sustainable development' in all three of its core facets (particularly social sustainability in this instance).

5.12 As has been established in successive local plan strategies in Sheffield, pursuing a spatial option that actively avoids utilising Green Belt land (including on plots that perform poorly against Green Belt purposes) is undeliverable and therefore unsustainable. As such, it is imperative that the opportunity to change the approach to achieving the housing and employment aims for Sheffield is embraced by the Council. Indeed, the benefits to be derived from allowing development on appropriate Green Belt plots would ensure that the change in approach is not a negative one but has an enduring positive impact on existing and future citizens, including from a fundamental sustainability perspective.

Availability of the Proposed Site

5.13 The site is under single ownership and is available for development.

Achievability

5.14 There are no financial constraints that would reduce the achievability of the development of this site.

6.0 CONCLUSIONS

6.1 This document has clearly set out that the site is suitable for the delivery of sustainable development in the manner indicated, and it is also available and achievable. It is therefore asserted once again that this site must be very favourably considered for such an allocation within the Emerging Local Plan as it continues to progress.

6.2 It is imperative that the Emerging Local Plan releases and allocates land from the Green Belt to support Sheffield in meeting its future housing targets. As part of this process, this report has sought to promote the site in question as being highly suitable for housing allocation within the new Emerging Local Plan.

6.3 Valid concerns remain in respect of the Emerging Plan's objective to deliver sufficient housing across the plan period within the existing built-up area. As has been set out in this document, this reliance on previously developed land predominantly within the central area, where permitted sites are already facing subsequent viability obstacles, is severely undermining the soundness of the Emerging Local Plan.

6.4 Similarly, a reliance on apartment schemes and Purpose Built Student Accommodation to deliver housing numbers overlooks the critical need for a full range of housing to meet increasing demand, thereby not meeting the requirements of those looking to remain or to locate in Sheffield in the future. Together, these shortcomings stand to have a severe negative impact on Sheffield's economic prosperity.

6.5 The discussion throughout this document has shown that the subject site represents an appropriate and suitable release of land from the Green Belt, to assist Sheffield City Council in delivering their housing targets in the Emerging Local Plan. This document has demonstrated its relative merits in relation to the Green Belt and wider planning policy.

6.6 Beyond this, and on a more general level, it is further asserted that the site in question represents a suitable site for housing delivery, being sustainably located in close proximity to the main built-up urban area of Ecclesfield in north Sheffield.

6.7 It is clear that the site does not fulfil a particularly important role within the Green Belt, and that what role it does play will not be harmed by its release from the Green Belt and any potential development in the future.

6.8 In summary, on account of the precarity of the purported available land for housing that is set out in the Draft Local Plan, much of which is located in areas that will undermine delivering a full range of housing, it is critical that significant additional land is identified to avoid an inevitable shortfall. Notwithstanding the evident underlying sustainable agenda that has guided the approach to development across the plan period, it is equally clear that delivery of housing targets will not be wholly possible through brownfield sites and in fact would be counterproductive to Sheffield's aspirations for growth. Subsequently, it is abundantly clear that sustainable Green Belt sites are required to accommodate this growth, providing a full range of homes to meet documented need. The site at Loicher Lane is able to host housing development on a highly sustainable Green Belt site, which is suitable, available and achievable.