

From: [REDACTED]
To: [REDACTED]
Subject: RE: Yk6804PS objection to Local plan Policies SP1, SP2, H1 and omission site
Date: 20 February 2023 17:52:12
Attachments: [image001.png](#)
[SCC Reg 19 Consultation Form - Parts A and B Land at Fulwood.pdf](#)
[02.17.MW.YK6804PS.Land at Fulwood Site Specific obo Sheffield Hospital Charity.pdf](#)

Please find attached our objection and associated forms for a site at Fulwood

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Sheffield Plan Consultation Representation Form January – February 2023

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

Responses can be submitted via

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

Please note:

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

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

Data Protection Notice:

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

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

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

Please tick/ delete as appropriate:

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

Yes

No

Part B - Your representation

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

Name or Organisation: DLP Planning

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

Policy Number: SP1, SP2

Paragraph Number:

Policies Map:

4. Do you consider the Sheffield Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

4.(1) **Legally Compliant** Yes

No

4.(2) **Sound** Yes

No

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

No

5. Please give details of why you consider the Sheffield Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Sheffield Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

See attached report

Continue on a separate sheet if necessary

6. Please set out the modification(s) you consider necessary to make the Sheffield Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in Question 5 above.

(Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Sheffield Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See attached report

Continue on a separate sheet if necessary

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.

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

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

Yes

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

No

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

The SPRU/DLP Planning Ltd have significant experience both in plan making, and local plan examinations, especially in terms of the tests of soundness so their experience on these matters will be of assistance to the inspectors.

The issues raised in this objection are not stand alone but must be regarded as part of a wider objection to the Local Plan. The failings of the local plan are both systemic and raise complex issues that are inter related across the whole plan making process which have lead to the plan as a whole being unsound.

In order to demonstrate this objections fully and to appropriately test that soundness of the plan will require attendance of suitably knowable persons at the hearings.

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



Strategic Planning Research Unit
A specialist team within DLP Planning Ltd

For and on behalf of
Sheffield Hospitals Charity

**SHEFFIELD CITY COUNCIL
PROMOTION / SUBMISSION**

Land at Fulwood, Sheffield

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

February 2023



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1.0 INTRODUCTION

- 1.1 This Statement has been prepared by the Strategic Planning Research Unit (SPRU) of DLP Planning Ltd on behalf of Sheffield Hospital Charity and provides a comprehensive assessment of the residential development potential at land south of Fulwood Sheffield. In addition to the potential for residential development, given the urgent need to identify sites to accommodate accommodation for older persons, there is scope to consider specialist housing on site. Subject to an identified need, there is also scope to include some flexible employment/retail space on site, along with the aforementioned residential elements. The site location is shown in Section 2 of this Statement.
- 1.2 This submission responds to an acknowledge shortfall in the provision of proposed supply as set out in the Sheffield Local Plan Regulation 19 Consultation when considered against Local Housing Need, as derived from the Standard Method. On the basis of a shortfall in provision, additional land should be identified for the purpose of meeting housing needs across the city.
- 1.3 This Statement will demonstrate that the site is deliverable as defined in the National Planning Policy Framework (NPPF) i.e. that it is suitable, available, and achievable for residential development, being located to the southern edge of Fulwood, which is a sustainable location within the city of Sheffield.
- 1.4 This report is structures as follows;
- Section 2 provides an overview of the key background information, including a description of the site and planning history overview;
 - Section 3 provides an assessment of the site in terms of key considerations;
 - Section 4 provides a deliverability assessment of the suitability, availability and achievability of the site for residential development; and
 - Section 5 provides a summary and conclusions.

2.0 KEY BACKGROUND INFORMATION

The Site and its Surroundings

- 2.1 The site subject to this Promotion Statement comprises land at Old Fulwood, Fulwood, Sheffield. It measures approximately 4.16 ha. An extract of the site location is shown in Figure 1 below (a separate location plan is appended to this submission).

Figure 1. Aerial image of subject site



- 2.2 The subject site comprises 1 no. field currently in agricultural use.
- 2.3 The subject site is located on the southern edge of Fulwood. The land to the immediate north-east benefits from outline planning permission (18/04773/OUT) for up to 161 residential dwellings. Residential development at Mayfield Heights and Storth Park are located to the west and north-west of the subject site respectively. It is understood that the land to the immediate north of the site has been recently sold, with the new owners seeking to bring forward development in the short to medium term.
- 2.4 Porter Valley Woodlands Local Nature Reserve is located to the immediate south of the subject site.
- 2.5 The subject site is located within the Sheffield Green Belt and within the Fulwood Conservation Area

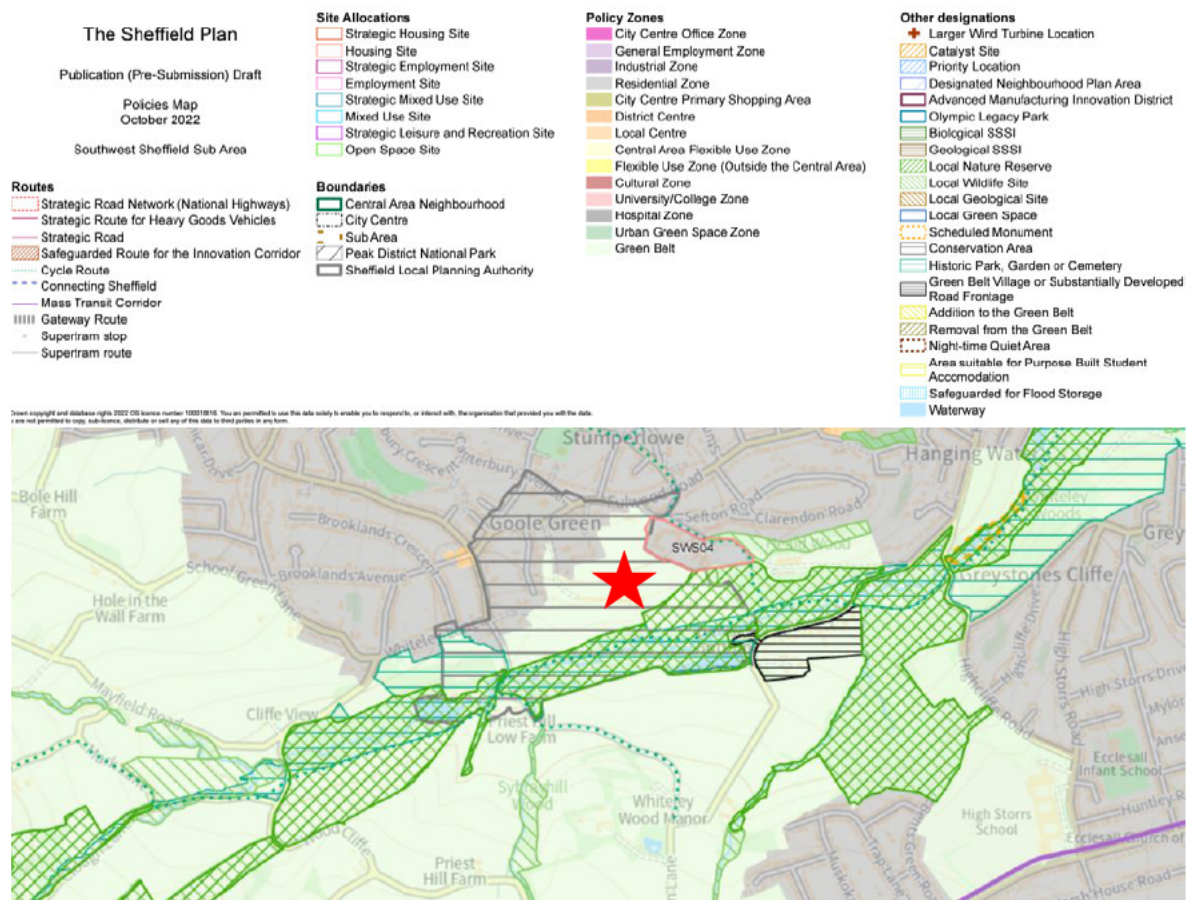
Planning Policy

- 2.6 The Development Plan relevant to the subject site currently comprise the Unitary Development Plan (UDP) and the Sheffield Core Strategy.
- 2.7 Given the datedness of the adopted Development Plan, the Council are currently preparing

a new Local Plan. In line with the Council’s latest Local Development Scheme (LDS), Regulation 19 consultation on the draft Local Plan is expected to commence in January 2023.

2.8 As demonstrated below, within the emerging Local Plan, the site remains within the Green Belt and Fulwood Conservation Area.

Figure 2. Emerging Local Plan Policy Map (red star denotes site location)



2.9 The emerging Plan outlines the expected Housing Land Supply for 2022-2039. With proposals for 35,700 homes, over the plan period, a rate of 2,100 homes per annum, an increase from 1,425 dwellings per annum set out in the Core Strategy, but is significantly below the latest figure calculated using the Government’s standard methodology (3,018 additional homes per year).

2.10 Some 298 sites are proposed to be allocated for housing and the Council also seeks to rely upon a further supply via future 'Broad Locations for Growth' and windfall sites. As is demonstrated on the above policy map, the site, listed above, to the immediate north of the subject site (SWS04) is allocated for residential development in line with the 2021 planning

permission.

- 2.11 The Plan seeks to protect much of the Green Belt boundaries with releases only at the former Norton Aerodrome, Loxley College, Stannington and University of Sheffield Innovation District. No further substantive review of the Green Belt has been recommended in terms of the performance of land against the five functions set out in national policy despite the Council identifying significantly less land for housing than that prescribed by the standard method.

Planning History

- 2.12 According to Sheffield City Council’s public access facility, the subject site has not been subject to any previous planning applications.

Sustainability

- 2.13 A residential suburb and ward of the city of Sheffield, Fulwood is located 5.5 kilometres west-southwest of the city centre. The ward had 18,233 residents as of the 2011 Census.
- 2.14 There are a range of services and facilities within Fulwood. The table below sets out key facilities and their walking distances from the subject site.

Table 1. Distance to nearest services & facilities

Service/Facility	Walking/Cycling Distance	Service/Facility	Walking/Cycling Distance
Nether Green Infant School	597m	Fulwood Sports Club	526m
Nether Green Junior School	862m	Co-op Food Store	596m
High Storrs Secondary School	3.37km	Christ Church	314m

- 2.15 The nearest bus stop is located approximately 130m to the north of the subject site on Fulwood Road. The stop is served by services 83A and 120 which provide direct connections to Ecclesfield, Sheffield City Centre and Halfway. The 120 service run from the stop approximately every 20 mins, with the first departing at 06:04 and the last returning at 22:02.
- 2.16 High Storrs Secondary School can be accessed via the 83A service from the subject site.

3.0 SITE ASSESSMENT - KEY CONSIDERATIONS

Access

- 3.1 Vehicular access can be taken via retained access off either Fulwood Road or via the permitted development to the north-east of the subject site. A short section of hedgerow will need to be lost to accommodate the access. The loss can be mitigated by new tree and hedgerow planting across the wider site.
- 3.2 Pedestrian footways run either side of Fulwood Road to the centre of the Fulwood suburb and the range of facilities on offer in the area. The route is lit and accordingly provides safe access to the amenities on offer, all of which are considered to be within a reasonable walking and cycling distance.

Topography

- 3.3 The site gently falls from north to south from a height of around 205m Above Ordinance Datum (AOD) to around 170m AOD. The topography of the subject site is not therefore considered a significant constraint to development.

Flood Risk and Drainage

- 3.4 The site is located entirely within Flood Zone 1 (low risk of flooding) as illustrated on the Environment Agency's Flood Map for Planning, such that the site's development would be consistent with the sequential approach to development prescribed in the NPPF. Further, there are no known surface water drainage issues on the site.

Figure 3. Flood Map for Planning



- 3.5 Despite the proximity to Porter Brook, the site is not identified as being at risk of surface water flooding. Any planning application would be supported by a detailed and robust Flood Risk Assessment and Drainage Strategy.

Legal/Operational

- 3.6 There are no known legal/operational issues associated with the development of the site for residential purposes.
- 3.7 The landowner is committed to promotion of the site, with a view to seeking to establish a principle of development by virtue of an outline planning application.

Environmental

- 3.8 The site does not contain any statutory ecological sites. As is set out above, the Porter Brook Woodlands Local Nature Reserve is located to the immediate south of the subject site. In addition to this, there are a number of non-statutory ecological sites within a 1km radius of the site, however no adverse effects are predicted.

Figure 4. Protected Areas



 Protected areas

- 3.9 A suitably qualified consultant will, at the time of an application, be instructed to assess the environmental impact of the proposed development, including identifying any recreational pressures that may be brought about by residential development of the subject site.
- 3.10 Any development proposals at the site would be informed by a Phase 1 Habitat Survey and any necessary species survey. In accordance with the NPPF (paragraphs 179-180) any development proposals could be designed in order to increase biodiversity.
- 3.11 In addition to this, there is significant scope within the site boundary to deliver a net gain in biodiversity, aligned with the green corridor to the south. There is sufficient available land to expand the green corridor and further open up the woodland for public access.

Landscape & Trees

- 3.12 As is set out above, the entirety of the subject site is located in the Sheffield Green Belt.

Figure 5. Green Belt Map



3.13 It is clear from the Regulation 19 version of the Local Plan, that the Council cannot, without releasing additional land from Green Belt, meet their housing needs as defined by the Local Housing Need figure derived from the Standard Method. As such, it is considered necessary that a comprehensive Green Belt Assessment is carried out, which assess each parcel, within the Green Belt, against the five purposes set out in national policy and guidance. The Framework places great importance on the Green Belt.

3.14 Aligned to this, it is noted that the subject site is well contained by mature vegetation on all sides, with views of the subject site generally limited to short distance views from neighbouring land. The majority of the existing landscape features located on the site can be retained within an appropriate layout. Development of the subject site, by virtue of the woodland to the south, will be limited and would not result in the built form extending any further south than is proposed through the adjacent planning permission/allocation. This also applies in respect of the coalescence of separate area, with Porter Brook acting as a permanent separation between Fulwood and the suburbs to the south.

3.15 Whilst there are a number of trees protected by a/numerous TPO's on the proposed

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allocation to the north-east, it is understood that the trees within the site are not subject to the same protection. Wherever possible, the trees within the site would be retained and designed into a viable layout. A detailed arboricultural assessment will accompany any formal application for residential development of the subject site.

Cultural Heritage

- 3.16 The site is located within the Fulwood Conservation Area, as is demonstrated on the plan below;

Figure 6. Conservation Area Plan



 Conservation Areas

- 3.17 The Fulwood Conservation Area Appraisal dates back to March 2008 but confirms that the Fulwood Conservation Area was designated in July 1978. Porter Brook and Whiteley Woods and the importance of the green corridor from the city centre out towards the Peak District are listed as one of the key defining features of the Conservation Area.
- 3.18 Within the Conservation Area Appraisal, the site is considered as part of Area 2 – The fields between village and wooded valley. The key characteristics of the Character Area include open field boundaries, views across Porter Brook Valley and a rural atmosphere.
- 3.19 An outline planning application would be supported by a comprehensive Heritage Assessment, which will consider any harm arising from development of the subject site to

the significance of the Conservation Area and its setting.

- 3.20 In addition to the Conservation Area, there are a number of non-designated heritage assets that will require further consideration, notably however, there are no designated or non-designated heritage assets within the site boundary.

Utilities & Infrastructure

- 3.21 There are no known constraints with regards to the availability of electricity, water, telecommunications and foul sewerage networks.

4.0 SITE CAPACITY AND DELIVERABILITY

Site Capacity

- 4.1 Taking into account site constraints, it is considered that the site is capable of delivering around between 80 and 90 dwellings on the basis of around 35 dwellings per hectare at a 60% developable area. In addition to this, and as set out above, the site is capable of accommodating specialist housing to meet the needs of an aging population and is also considered suitable to accommodate small-scale flexible employment land and/or retail space supplementary to the principle residential use.
- 4.2 A development of this size would make a significant contribution to meeting the City's identified need for new additional housing and 5 year housing land supply position. It is envisaged that the development could deliver policy compliant affordable housing to meet local needs, for example by way of affordable homes for rent, starter/first homes, discounted market sales housing or other affordable routes to home ownership (e.g. shared ownership) in accordance with the definition of affordable homes at Annex 2 of the NPPF and the Government's Ministerial Statement (concerning First Homes) published 24/05/21.

Deliverability

- 4.3 The glossary to the National Planning Policy Framework (NPPF, 2021) confirms that in order for a site to be considered deliverable, they should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.
- 4.4 The NPPF glossary also confirms that to be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.
- 4.5 The below therefore assesses the site in terms of its suitability, availability and achievability.

Suitability

- 4.6 The Planning Practice Guidance (PPG) confirms that a site can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated (Paragraph: 018 Reference ID: 3-018-20190722).
- 4.7 The site is located on the southern edge of a major city suburb, accommodating a range of existing housing. As set out earlier, the site is within walking and cycling distance of the a range of day-to-day facilities, services and employment opportunities. In addition, there are

bus stops around 130m from the subject site and provide services to the city centre every 20 minutes. As such, the site is therefore well placed to encourage more sustainable patterns of travel and reduced reliance on the private car, consistent with the sustainable principles set out in the NPPF.

4.8 In terms of technical constraints (including access, topography, landscape, trees, noise and air quality), these are capable of being mitigated through a sensitive layout and design and are not considered a barrier to development.

4.9 The site is therefore considered suitable for residential development.

Availability

4.10 The PPG states that a site can be considered available for development, when, on the best information available, there is confidence that there are no legal or ownership impediments to development. Land controlled by a landowner who has expressed an intention to develop may be considered available (Paragraph: 019 Reference ID: 3-019-20190722).

4.11 The site is controlled by Sheffield Hospitals Charity. It is their intention to develop the site for residential purposes and therefore the site is considered available for residential development.

Achievability

4.12 The PPG confirms a site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period (Paragraph: 020 Reference ID: 3-020-20190722).

4.13 Whilst no specific viability work has been undertaken to date, on the basis that there are no known/overriding technical constraints at this stage or that have indeed been identified as part of nearby applications, the development of this site for housing is likely to be economically viable as has indeed been the case for the adjacent sites.

4.14 As the site is greenfield, there are not expected to be any significant abnormal costs associated with contamination, ground conditions or access for example.

4.15 The site is therefore considered achievable for residential development.

5.0 SUMMARY AND CONCLUSIONS

- 5.1 This Promotion Statement has been prepared by DLP Planning Ltd on behalf of Sheffield Hospitals Trust in support of the ongoing promotion for residential /mixed development of land to the south of Fulwood, Sheffield.
- 5.2 It is imperative that a variety of size and types of sites are allocated for housing across the city to provide choice to the market and headroom for delivery against the objectively assessed requirement and economic growth aspirations. A development of this size would make a significant contribution to meeting the City’s identified need for new additional housing and 5 year housing land supply position, in a time of a national housing crisis. It is envisaged that the development could deliver policy compliant affordable housing to meet local needs.
- 5.3 This Statement demonstrates that the submitted site is suitable, available and achievable for residential development, with evidence of such successful schemes adjacent the site to the east. Development of the site for housing would enable the Council to make efficient use of land and maximise the delivery of housing for the emerging Plan period, forming a logical extension to the suburb on a well contained parcel of land.



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