

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

Respondent details

Comment ID number: PDSP.078.001

What is your Name: James Hobson

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

JEH Planning Limited

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

St Pauls Developments plc and Smithywood Business Parks Development LLP

Document

Which document to you wish to make a representation on:

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

Which section of the document is your representation on:

Policy SP1: Overall Growth Plan

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

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: No

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

Please see our representations sent via email in relation to the following policies:

- 2.0 SP Part 2 Section 5 - A Strong Economy
- 3.0 Part 1: Policy SP1 (criterion b.) - Future employment land requirements 4
- 4.0 Part 1: Policy SP 2: Spatial Strategy for Employment
- 5.0 Part 1: Policy SP1 Protection of Green Belt
- 6.0 Part 1: Policy SP1 Major New Transport Infrastructure
- 7.0 Evidence Demonstrating the Suitability and Deliverability of Site Ref No S04101 - HELAA 15

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

Please see our representations

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

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

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

The representation we have submitted raise fundamental issues regarding the soundness of the draft Local Plan.

From: [REDACTED]
To: [REDACTED]
Subject: FW: Your response on Draft Local Plan -St Pauls Developments plc and Smithywood Business Parks Development LLP
Date: 20 February 2023 09:48:01
Attachments: [image001.jpg](#)
[Smithywood Draft Repls Sheffield Plan Publication Version Dec 2022 Final 15022023.pdf](#)
[image002.jpg](#)

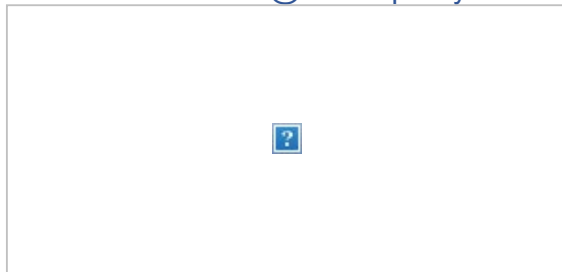
Alaina Briggs (she/her)
Equalities and Engagement Officer
Equalities & Engagement Team
Policy, Performance and Communications
Sheffield City Council
Phone: [REDACTED]

I am currently hybrid working from home and the office. My working days are Monday, Tuesday, Thursday and Friday. I am on leave every Wednesday.

Website: www.sheffield.gov.uk/equality

Website: <https://www.sheffield.gov.uk/home/campaigns/equality-partnership>

Follow us on twitter: @SCCEqualityPart



From: James Hobson [REDACTED]
Sent: 15 February 2023 16:34
To: consultation <consultation@sheffield.gov.uk>
Subject: RE: Your response on Draft Local Plan -St Pauls Developments plc and Smithywood Business Parks Development LLP

Dear Sir/Madam

To accompany the representation form we have completed and submitted on behalf of St Pauls Developments plc and Smithywood Business Parks Development LLP below, please find attached the full version of our representations for your consideration.

Kind regards

James

James Hobson
Managing Director



Address: Lindley House Hungate Bishop Monkton Harrogate HG3 3QL

Telephone: [REDACTED]

Website: <https://jehplanning.com/>

From: Have Your Say Sheffield <notifications@engagementhq.com>

Sent: Wednesday, February 15, 2023 4:25 PM

To: James Hobson [REDACTED]

Subject: Your response on Draft Local Plan

Thank you for your response on [Draft Local Plan](#)

Have Your Say Sheffield

Hi James Hobson,

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

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

JEH Panning Limited

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

St Pauls Developments plc and Smithywood Business Parks Development LLP

Which document do you wish to make a representation on?

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

Which section of the document is your representation on?

Policy SP1: Overall Growth Plan

Do you consider the Local Plan is legally compliant?

Yes

Do you consider the Local Plan is sound?

No

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

No

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

Please see our representations sent via email in relation to the following policies: 2.0 SP Part 2 Section 5 - A Strong Economy 3.0 Part 1: Policy SP1 (criterion b.) - Future employment land requirements 4.4.0 Part 1: Policy SP 2: Spatial Strategy for Employment 5.0 Part 1: Policy SP1 Protection of Green Belt 6.0 Part 1: Policy SP1 Major New Transport Infrastructure 7.0 Evidence Demonstrating the Suitability and Deliverability of Site Ref No S04101 - HELAA 15

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

Please see our representations

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

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

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

The representation we have submitted raise fundamental issues regarding the soundness of the draft Local Plan.

Thank you,
Sheffield City Council

Other projects that might interest you

Sheffield City Partnership Board Equality Monitoring

Project for Sheffield City Partnership Board members and presenters.

[View Project](#)

Commissioning Plan for Mainstream Education Places 2023-2026

The Council is consulting on our Commissioning Plan for Mainstream Education Places 2023-2026,...

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Stocksbridge - new local bus service

The Stocksbridge Towns Fund Board is looking to work with local transport providers to deliver a...

[View Project](#)

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Representations

Client: St Pauls Developments plc and Smithywood
Business Parks Development LLP

Proposal: Sheffield Plan Publication Draft December 2022

Site: Land South of Junction 35 of M1 Motorway and
South of Smithywood Business Park, Cowley Way,
Sheffield S35 1QP (HELAA Ref: S04101)

Date: February 2023

Ref: JEH013



Representations

Document control

Document:	Representations		
Project:	Sheffield Plan Publication Draft		
Client:	St Pauls Developments plc and Smithywood Business Parks Development LLP		
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Prepared by:	██████████	Checked by:	██████████
		Approved By:	██████████
Description of revision:			

Representations

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Representations

1.0 Introduction.

- 1.1 These representations are prepared by JEH Planning and have been made on behalf of the St Pauls Developments plc and Smithywood Business Parks Development LLP 'our client' in response to the Publication Version of Draft Sheffield Local Plan that was released in January 2023 for consultation.
- 1.2 Smithywood Business Park LLP is a well established joint venture partnership between Norfolk Estates and St Pauls Developments Plc and is the company vehicle that has led to the successfully remediation and ongoing redeveloped of the former Smithywood Colliery into a 20 hectare business park. To date over 46,451 sq.m of accommodation has been completed and approximately 4.5 Ha of land remains available for further employment development.
- 1.3 Our client also has a landholding interest on a site known as land to the south of Junction 35 of the M1 Motorway and immediately to the south the Smithywood Business Park, Cowley Way, Sheffield S35 1QPL. These representations specifically relate to the active promotion of a proposed employment use on this land.
- 1.4 This site has been actively promoted through the call for sites HELAA process that was undertaken in February 2020 and our clients are firmly committed to unlocking the right kind of economic and sustainable growth for the region with the objective of achieving a development allocation within a key strategic location.
- 1.5 Our clients fully embrace the local plan process of evaluating spatial strategies and this development prospect would deliver the right kind of employment and housing to achieve the Council's objectives. Technical and environmental reports have already been prepared in relation to transport flood risk/ drainage strategy, ecology, ground conditions as well as landscape and visual assessment as a result of the proposed MSA planning application that progress on part of the site and was subsequent withdrawn for determination.
- 1.6 Whilst a recent updated draft of the NPPF has been released for consultation as well as the related Prospectus, we consider that given the draft status of these documents the proposed changes carry no weight in the consideration of the Council's Local Plan process and so our representations are submitted in the context of the current national guidance regarding plan making.

Representations

- 1.7 This statement has been prepared and formatted using the relevant policy headings taken from the draft Sheffield Plan document. Where relevant our representations also examine in detail the background documents and evidenced based work that has been undertaken by the Council to inform the decision making process.

Representations

2.0 SP Part 2 Section 5 - A Strong Economy

- 2.1 In terms of the key aims, we would not quarrel with ensuring that there is a strong economy across the city with strong transport connectivity between communities and commercial areas. However, it is also important to secure successful commercial markets for a wide range of sectors and the size and locations of these requirements need to take full account of relevant market and economic signals and so a more positive approach to this objective is required. These issues are explored in more detail in our objections to draft Policies SP1 and SP2 in Part 1 of the Local Plan.

Representations

3.0 Part 1: Policy SP1 (criterion b.) - Future employment land requirements

Employment Need

- 3.1 Policy SP1 criterion b.) makes reference to the provision of 12.9 ha of employment land per year which includes 2.9 hectares for office development; and 10 hectares for industrial development. We consider that this level of requirement is insufficient to deliver the key objective of achieving a stronger economy as outlined in the plan.
- 3.2 A number of key drivers and macro trends are likely to influence the type, scale and location of requirements for employment space in the city over the plan. It is therefore important that the Council responds to these changing preferences to ensure that the business needs can be met with in Sheffield.
- 3.3 In terms of reviewing employment requirement, consideration should also be given to the Employment Land Review 2021 (ELR), the Employment Land Need and Supply Technical Note and the Sheffield Economic Plan (SEP).
- 3.4 The ELR modelled eight different economic scenarios focusing on Labour demand, Labour supply and past take it rates and the figures ranged from a requirement of between 176ha to 242 ha during the period 2018 and 2038.
- 3.5 The commercial market analysis undertaken as part of the ELR has concluded that there is a shortage of employment land available for development in the short to medium term, with those consulted stating that there is an over-supply of poorer quality, older industrial stock in particular which gives a misleading impression when vacancy rates and availability levels are analysed. As a consequence, the City has missed out on several very large enquiries for industrial / warehousing land in the past
- 3.6 The current rapid growth seen in e-commerce (which is not reflected in the historical record or Experian job growth projections to the fullest extent), combined with increased 'on-shoring' has driven demand in the industrial and logistics market across 2020 and is affecting Sheffield City just as it is impacting on most of the larger cities across the UK.

Representations

- 3.7 This growth in demand represents an excellent opportunity for Sheffield; however, the lack of land available for industrial development, both for inward investment but also for more modest smaller industrial units in the short to medium term will lead to the City being unable to capitalise on this opportunity, and as a result lead to a further loss of potential occupiers to competing areas.
- 3.8 Evidence from agents in the ELR noted that the lack of appropriate stock is causing many firms to instead locate into other less desirable areas such as Doncaster, Rotherham and Barnsley. The City risks missing big opportunities from the sector in the near future, as whilst the offer is ideal with good transport links, availability of skills and a wider leisure offer for workers, no specific land requirement or sites feature in the Local Plan and we object to this approach.
- 3.9 The Logics Study prepared by IcenI and commissioned by the Council was released in December 2022. This study identifies a Class B8 need of between 69.6 – 86.8 ha with a mid point of 78.2 ha. The report recommends that Sheffield should plan for this amount to make a meaningful contribution within the South Yorkshire property market in line with its own forecast need. Even with the possibility of factoring existing sites being potentially recycled for logistic requirements the consultants of the report confirm it would only modestly reduce the requirement to 62.6Ha or 3.7ha per year.
- 3.10 Turning to Sheffield's supply position, IcenI has assessed sites for large scale logistics resulting in a potential 22.3 ha – 84.2 ha of available land. However, it is acknowledged that much of this identified supply is reserved for manufacturing activities, as many of these parcels of land are in manufacturing priority locations. Overall, based on the recommended need of 62.6 ha (assuming a contribution from recycled sites as above) and the supply is 22.3 ha there will be a deficit in provision. However, the Council have no intention of meeting the longer term logistics needs for its own area, which will result in further constraints on business activity as confirmed by their consultant. We consider that this approach to the will make the plan unsound.

Representations

- 3.11 The selection of the employment land requirement should align with the Council's economic aspirations and housing targets which in our view should be more ambitious than the Local Housing Need figure to reflect the jobs growth target set out within the SEP and the status of Sheffield as an important city having the capacity and opportunity to drive the local and regional economy forward as part of the levelling up agenda for the north of England.
- 3.12 Against the recommendation set out within the ELR, the Sheffield Plan figure of 12.9 Ha per annum is not very ambitious and it ignores an allowance to cater for the logistics sector against the advice of their consultants. We recommend It should increase to a figure more towards the upper end of the range of the eight scenarios tested and suggest a requirement figure of 242 hectares over the plan period which would be reasonable and achievable.

Employment Supply

- 3.13 In terms of the quantitative supply, the 2021 ELR reviewed a range of sites to assess their suitability for employment use. Having regard to sustainability, market attractiveness and policy adherence it was considered that 67 were suitable for employment and comprised 197.17 hectares. However, 10 of the 67 sites are likely to include an element of non-employment uses, relating to 28.16 ha. Therefore, the Council's employment land portfolio could comprise up to 169.01 ha, plus a further 28.16 ha of sites that are likely to contain an element of office, industrial and warehousing land.
- 3.14 The draft Local Plan at paragraph 3.8 refers to existing planning permissions and proposed site allocations identified in the plan which would provide 171.42 hectares of employment land. Although it is not clear, we assume that the different and reduction in supply between the ELR and the figure within the draft Local Plan is because the Council have decided to transfer land previously earmarked for employment and allocated it for other uses such as housing to avoid development on Green Belt land. Paragraph 6.8 of the HELAA seem to confirm this approach by making an assumption that 4.23 hectares of employment land per year (or 71.91 ha over the plan period) will be developed for housing and other non office, business or industrial uses.

Representations

- 3.15 However, the implication of adopting this approach is that based on the Council's employment need figure this will reduce the supply and represent a shortfall of 47.88 Ha which will not be sufficient to support the economy strategy in the Plan. Indeed, we think the need figure of 242 ha at the upper end of the recommended range found in the ELR should be adopted which would increase the shortfall proposed in the emerging Plan to 70.58Ha.
- 3.16 Whilst the Council may wish to claim that further potential sites may come forward from windfall opportunities to add to future economic land supply, no compelling evidence of this category of potential site has been provided.
- 3.17 Furthermore, the demand /supply analysis within the ELR assumes that the authority's undeveloped employment allocations come forward in their entirety for employment development over the plan period, and that all extant employment land planning permissions will be developed which will not be the case due a wide range of reasons.
- 3.18 Any significant deviation from this broad assumption would have an impact upon the overall balance resulting in an increase in the shortfall. There will be insufficient 'churn' of economic land within the city and no flexibility across the city region to ensure that demand can be met throughout the plan period.
- 3.19 In addition, based on an assessment of the proposed employment allocations these do not offer a sufficiently wide range of provision to address qualitative factors. Additional land is therefore required for qualitative reasons, in order to:
- Improve the choice of provision for occupiers;
 - Meet gaps in the supply of particular types of premises;
 - Improve or modernise the quality of current provision and so help attract more occupiers; and/or,
 - Provide a better spatial distribution of employment sites to meet the needs of different urban areas and settlements.

Representations

- 3.20 Based on this assessment we consider that further employments need to be allocated. It is therefore requested that the Council identifies and allocates additional sites that are considered to be suitable and deliverable for B Class employment uses. Any new sites should be sustainable and, ideally, located within areas of strong market demand.
- 3.21 Policy SP1 makes no provision for large scale B8 uses which we object to. Given the scale and urgency of the 'Big Box' logistics e-commerce issue nationwide, the Council should give consideration to the opportunity arises to quantify and provide for large-scale strategic B8 in their area and identify specific sites where this need should be allocated. This approach was specifically recommended in the ELR and also by the consultant who prepared the Logistics study.

Representations

4.0 Part 1: Policy SP 2: Spatial Strategy for Employment

- 4.1 We are aware that a high level city region wide Strategic Employment Land Appraisal (SELA) (May 2020) has examined the need for the supply of employment land across the SCR. This is in line with guidance to work with planning authorities in a Functional Economic Market Area (FEMA) when assessing the need for land in the context of the duty to cooperate.
- 4.2 A key recommendation in the SELA is for local planning authorities to work together on a collaborative strategy to steer footloose uses search as logistics and distribution uses to the most optimum locations. However, the SEA recognise that Sheffield is well positioned within the M1 corridor and this strong North-South highly accessible link should be considered as part of this process for locating these types of uses as it is an inherent strength and opportunity of the city which should be exploited rather than rely on other opportunities emerging elsewhere within the region.
- 4.3 Therefore, Sheffield is considered to be the prime industrial market within the South Yorkshire region and the ELR suggests there is a limited supply of suitable sites along the M1 corridor between junctions 33-34. The ELR has also identified that agents consider there is a need for additional level sites to the east of Sheffield close to the motorway.
- 4.4 In terms of the different types of industrial and logistics space which need to be provided in the future, it will be important for Sheffield to maintain an appropriate mix of sites in key locations in order to attract higher end occupiers and still retain its core indigenous employment base.
- 4.5 When considering the distribution and character of economic growth across Sheffield, the spatial strategy relates to nine sub areas that feature in Policy SP2 and these need to have more regard to the market in terms of locational requirement for different types of businesses.

Representations

- 4.6 Policy SP1 at criterion d.) confirms that the priority locations for economic growth are proposed within the Central Sub-Area, and the Advanced Manufacturing Innovation District (AMID) to help meet the objectives of the South Yorkshire Mayor Combined Authority Strategic Economic Plan (SYMCA SEP). However, we consider the Plan should also recognise the commercial locational value associated with other sub areas that have a strong relationship to the strategic transport network including Sub Area Northeast Sheffield.
- 4.7 We note that for the sub area of Northeast Sheffield the existing Smithywood Industrial Estate is identified which we support, however this provision and approach to employment in this area does not go far enough in order to capitalise on its economic growth potential.
- 4.8 In terms of future growth potential for Sheffield, we consider that this area to the south of Junction 35 of the M1 Motorway has excellent connectivity to the M1 corridor and ready access to the labour market being close to the existing employment area immediately to the west, and the existing Smithywood Phase1 to the north. There is also the possibility of a future rail or tram train connection to the site via the Chapeltown to Meadow line which should be considered for upgrading/reinstatement. This infrastructure provision would not only improve accessibility to adjacent employment areas but also open up the opportunity to extend the AMID in a northerly direction.
- 4.9 Furthermore, rather than simply focus the AMID area within the East Sheffield Sub area, greater emphasis should be given to facilitating a wider geographical fluidity of AMID linked to establishing a strategy of delivering a strong transport network that will create new opportunities such as extending out the Northeast sub area and including the strategic development site we are promoting at Smithywood Phase 2.
- 4.10 In summary, the proposed Spatial strategy does not allow for a sustainable pattern of development to be able to grow the economy. The location of proposed employment allocations in the Plan do not reflect the requirements of future businesses which will be influenced by site opportunities that have excellent connectivity to the strategic transport network.

Representations

- 4.11 Based on the proposed spatial distribution of growth within the both the City and this sub area we consider that this approach does not maximise this opportunity. As an alternative we contend that within the Northeast Sub area an employment allocation at Smithywood Phase 2 site, which amounts to approximately 35 Ha (gross) in size represents a good opportunity for economic development as it would create a truly first class business opportunity that would directly satisfy and capture the demands of the anticipated future commercial market as well as meet the aims and objectives of the emerging plan.

Representations

5.0 Part 1: Policy SP1 Protection of Green Belt

- 5.1 Criterion h.) of draft Policy SP 1 confirms the protection for existing Green Belt boundaries around existing built-up areas, with one strategic land releases on a predominantly brownfield site at the former Norton Aerodrome (for residential use).
- 5.2 The draft Plan makes references to Smithywood in the context of the existing identified industrial areas but we consider this site should be expanded to provide an attractive employment location to address the shortfall in employment need as set out in our response Policy SP1 . The plan avoids addressing the relationship between finding suitable employment locations and sites to support economic growth and demonstrating exceptional circumstances before making changes to the Green Belt.
- 5.3 Based on the evidence found within the ELR and the Logistic Study, we consider the Council have wrongly come to the conclusion that there is an adequate supply and quality of employment land available without requiring the need to release Green Belt land. We take an opposing view and suggest that based on: the envisaged level of growth required during the plan period; the limited availability of sites to accommodate this need on brownfield site; and the locational requirements of the different economic sectors, there are significant grounds to confirm that exceptional circumstance exist to warrant the release of Green Belt land to deliver the economic objectives of the plan.
- 5.4 We are aware that the proposed draft changes to the NPPF at paragraph 142 states as follows:

' Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Green Belt boundaries are not required to be reviewed and altered if this would be the only means of meeting the objectively assessed need for housing over the plan period.'

Representations

- 5.5 Given its draft status no weight can be given to this proposed policy change. However, it should be appreciated that this proposed change is specifically directed at meeting the objective assessment needs for housing only and therefore it does not apply to meeting the objective assessment needs of employment provision in a local authority's area. This is an important distinguish that should be recognised in the Council's plan preparation process and allows them to release land from Green Belt for employment purposes where exceptional circumstances can be demonstrated which in Sheffield's case these exist.

Representations

6.0 Part 1: Policy SP1 Major New Transport Infrastructure

- 6.1 Criterion j.) of draft Policy SP1 identifies major new transport infrastructure, including: local rail upgrades, including to the Hope Valley Line and Barrow Hill Line. In addition to these upgrades we consider that to improve the key mass transit transport corridors for providing fast direct public transport services from the suburbs to the central area we would recommend that using the existing railway line between Meadowhall and Chapeltown as an extension to the tramline to facilitate a potential extension of employment areas for AMID in this direction should also be considered.
- 6.2 Within the UDP there was a proposal for a proposed railway station and park and ride facility in close proximity to the Smithywood site to the south of Nether Lane and as part of the reinstatement study to maximise rail/tram as a mass transit option this opportunity should be re-assessed as part of examining the employment proposal we are seeking to advance.
- 6.3 Development along this transport corridors would increase the prospects of creating key pieces of infrastructure that would be more viability as a result of increasing the population and businesses in the catchment areas of the proposed station.
- 6.4 It is also important to consider this proposed transport initiative in the context of ensuring that AMID is equipped with better and more improved transport connectivity as this will enable accelerated growth as well as improved levels of sustainability and reduced highway congestion through providing modal choice.

Representations

7.0 Evidence Demonstrating the Suitability and Deliverability of Site Ref No S04101 - HELAA

Overview

- 7.1 The introduction to our representations outlines the site our client has an interest in and is actively promoting it as a development opportunity. This site has been promoted through the 'Call for sites' consultation process.
- 7.2 The site extends to approximately 35 hectares and is currently in agricultural and woodland use. The site relates well to the existing urban area as it lies immediately to the south of Smithywood Business Park and to the west lies an existing Industrial Estate with access off Loicher Lane.
- 7.3 In terms of the other site boundaries, to the east lies the M1 motorway with Junction 35 roundabout immediately to the north east of the site. To the south lies Butterwaite House (serviced office space) and Jumble Cattery. The southern boundary is physically defined by Loicher Lane and Jumble Lane. All these features visually create an urban fringe character to the site which is well contained and detached from the wider countryside setting further to the east. and south
- 7.4 The site lends itself to be a strategically well placed employment site due to its good level of accessibility to Junction 35 of the M1 motorway and its association with the successful Smithywood Business Park development immediately to the north. We consider that this area of the site would be appropriate for commercial / business related uses with a direct access extending through the existing Smithywood development via Cowley Way. The site location plan below shows the site edged blue together with a white arrow denoting the proposed access from Cowley Way:

Representations



Figure 1: Site Location Plan

Representations

- 7.5 The northern portion of the site was previously promoted as a Motorway Service Station (MSA) and this application was recently withdrawn on 22nd January 2020. The MSA proposal identified a direct highway access from Junction 35 roundabout which raised issues regarding its impact on the adjoining ancient woodland and ecological habitats
- 7.6 The previous MSA application carefully considered and addressed in detail the implication of the likely environmental effects of a large scale development proposal within and adjoining the ancient woodland, ecology habitats and the wider landscape character. This new development opportunity would be informed by the previous technical work undertaken. The revised site area found within the HELAA site provides an opportunity to review the development layout and avoid the more environmentally sensitive areas that related to the previous MSA application. It could also look to introduce a scheme of mitigation/compensation measures if required.
- 7.7 In terms of the availability of the sites we can confirm that Smithywood Business Park LLP already controls the access into the site from Cowley Way. There are two other landowners relating to this site and both are fully aware of the potential opportunity being promoted. They have expressed a willingness to cooperate with our client to allow them to actively pursue this development opportunity through the local plan process.
- 7.8 The Smithywood area is served by a number of bus services running along the A629. Bus Service number 135/135a provides a regularly weekday service between Chapelton and Sheffield city centre.
- 7.9 By virtue of an increased critical mass and scale of employment that would be delivered as a result of an expansion of the Smithywood employment area, there would also be the opportunity to consider public transport improvement measure as part of the Council's wider transportation strategy. These measures could include the re direction of bus routes through the proposed employment areas and exploring the provision of a new tram/train station positioned in close proximity to Smithywood employment area as part of the Rail Reinstatement funding initiatives to upgrade the line between Meadowhall to Chapelton.

Representations

- 7.10 Whilst the draft Plan seeks to promote and focus employment opportunities with the AMID area we would contend that that AMID in its current form is nearing capacity and suitable opportunities for good quality employment sites are being exhausted. It is therefore important that its geographical area is reconsidered and becomes more fluid in form. The future transport links and connectivity that would serve the Northeast Sub Area and link into the existing AMID area together with the proposed expansion at Smithywood to create a key strategic location would ensure that the threat of not achieving the economic opportunities associated with AMID on the scale anticipated would be avoided.
- 7.11 In summary, we consider that the proposed Smithywood employment expansion site would perform a key strategic role in association with the existing surrounding employment area to help Sheffield City achieve its economic growth ambitions.

Logistic Study Report 2022

- 7.12 Based on the criteria outlined in the Logistic Study report at paragraphs 7.10 – 7.13 which assesses the suitability of sites for large scale logistics for these purposes, the Smithywood site would strongly align with these requirements on the basis of:
- Good connections with the strategic highway network
 - It is sufficiently large and flexible in its configuration so that it can accommodate the range of sizes of distribution centre warehouse units now required by the market.
 - It is accessible to labour (with a maximum drive time of 30 minutes), including the ability to be served by sustainable transport, and where appropriate being located close to areas of employment need.
 - It is located away from incompatible land-uses and has the ability to undertake 24/7 unrestricted operating hours and manage noise/lighting expectations.
 - The ability to deliver high-bay warehousing at least 20m height.
 - It has strong sustainability credentials and has the potential of improved transport connectivity to both the City Centre and AMID via a new rail/tram station on the train line between Meadowhall and Chapeltown.

Representations

- being appropriately located relative to the markets to be served

7.13 At paragraph 7.15, the Logistic Study recommends a sequential order to allocating suitable sites that met the above criteria. The Smithwood Phase 2 site would fall within the first priority of sites as it is an extension of an existing industrial / distribution site and has adequate road capacity serving the site and at adjacent motorway/dual carriageway junctions.

Site Selection Methodology Note January 2023

7.14 Similar to the Green Belt sites not being assessed as part of the HELAA, which we have objected to elsewhere in our representations, the Site Selection Technical Note confirms at paragraph 3.20 that all greenfield/ Green Belt sites and non-sustainable brownfield Green Belt sites were excluded from the process at stage 1 of the assessment. Based on our view that Green Belt releases will be required to ensure that Plan can be considered sound, the approach adopted by the Council is too narrow in its assessment of alternative sites particular if an independent Local Plan inspector decides that further consideration should be given to the release of Greenfield/ Green Belt sites in order to meeting the growth requirements of the City and achieve a Plan that is 'sound'.

7.15 The sources of the sites identified in the technical note extend historically to the undeveloped allocations within the UDP. We would question the deliverability of sites that have previously been identified as potential development opportunities but have never been implemented over the last 20 years or so. Only those sites where there is strong evidence to suggest that they are currently being actively pursued and promoted should feature in the site selection process.

Green Belt Review 2020

7.16 In our view it is necessary to remove some land from the Green Belt to meet future development needs and so we welcome the principle of the Green Belt Review.

Representations

- 7.17 Based on our response to Policy SP1 we believe there are insufficient quality of suitable employment sites that can be delivered within the urban area and as such exceptional circumstances at a strategic level exist to warrant the release of land from Green Belt to accommodate employment needs. As such, the review helps identify and target areas that least meet the purposes of including land in the Green Belt as set out in the NPPF.
- 7.18 Details of the Green Belt review methodology are set out within the Green Belt Review September 2020. The first stage of the Green Belt assessment examines and identify how broad parcels of land in the Green Belt perform against the relevant five purposes of Green Belt. The criteria for identifying the broad parcels are set out in Section 5 of the review document and are essentially strategic in nature whilst focusing on the proximity of the settlement hierarchy as previously set out in the Core Strategy.
- 7.19 Whilst the consideration of strategic parcels can be a useful starting point, the smaller resultant Green Belt parcels are of greater significance and value as it is the assessment of these area that could lead to specific sites being released. Indeed, it is recognised that a smaller resultant parcel could have a very different assessment against Green Belt purposes than the 'parent' general area. As part of the sieve process we would suggest that smaller parcels that fall within the common constraints listed in paragraph 6.4 and 6.6 could be excluded from the assessment but if these constraint only form a small part of the parcel or it can be demonstrated through technical work that the impact can be mitigated to a satisfactory level, a judgement should be made rather than automatically ruling out the entire parcel.
- 7.20 Whilst we would agree at a general level that the identification of smaller parcels should reflect the settlement pattern establish within the Core Strategy (which focuses development within the main area of Sheffield and the principal towns,) there should be an allowance made in order to consider potential strategic employment location as there are potentially a wide range of other factors at play (such as transport connectivity to the strategic network, or the relationship to other business as part of achieving a clustering effect) that will determine the suitability of these types of uses.

Representations

- 7.21 We note that there is a strong correlation between the smaller Green Belt parcels and the sites that have been actively promoted by landowners or agents through the Call for Sites process and this is supported as it allows full consideration of their suitability for development which can then be taken in to account as part of the overall site selection methodology if a need to release land from the Green Belt is evidenced.
- 7.22 We support the view that the process of the scoring system of the parcels of land against the purposes of Green Belt is not solely mechanistic and there will be an opportunity to apply sound professional judgement as part of the selection process. Nevertheless, the scoring system provides a useful starting point and we have reviewed our client's site against the Green Belt purposes and assessment criteria providing our own views and revised score where appropriate.
- 7.23 In addition to scoring the site against the relevant purposes of Green Belt, each small parcel was assessed to ascertain how robust the new Green Belt boundary would be if it was removed from Green Belt and this was compared to the relative strength of the current boundary. However, whilst this assessment has been quantified, unlike the scoring methodology for the Green Belt purposes, there is no guide in the review as to how the score should be applied and so this requires further explanation.
- 7.24 In terms of purpose one - checking the unrestricted sprawl of large urban areas, we agree that parcels which are well connected to the settlement and are contained by the adjoining built form essentially restricts urban sprawl and consider the assessment satisfactory. However, another important aspect to consider is the strength of the existing boundary in preventing urban sprawl which would not otherwise be prevented by a barrier. The NPPF states that local authorities should define boundaries clearly using physical features which are readily recognisable and likely to be permanent. Highly defensible boundaries would include motorways, main roads, railway lines and natural land formation such as water courses, woodland area and development with strongly established boundaries. Features lacking in durability could comprise development with weak irregular and inconsistent boundaries. A better qualitative and quantitative scoring system to assess existing and proposed boundary parcels should be undertaken which assigns the results to this Green Belt purpose rather than it being a standalone assessment.

Representations

- 7.25 In terms of purpose two - preventing neighbouring towns from merging, we suggest that distance between distinct main settlements is too simplistic and a 'scale rule' approach should be avoided. Therefore, in addition to asking the question whether the loss of Green Belt would lead to a significant reduction in distance between settlements, it is also important to consider the visual function and more consideration should be given to the overall visual landscape character having regard to the topography and defensible barriers between existing urban areas as these will influence the impression of whether there is a sensitive gap that requires protection.
- 7.26 In terms of purpose three relating to safeguarding the countryside from encroachment, consideration should be given to the sensitivity of landscape quality. In particular whether or not there are national or local landscape designation areas and does the Green Belt area displays semi urban/urban fringe characteristics. If so, we would suggest these parcels would have a low sensitivity to development and should be considered in the scoring process to improve the somewhat crude approach suggested in the Green Belt Review.
- 7.27 In terms of purpose four - preserving the setting and special character of historic towns, we would agree with the Council that this purpose should not be assessed as there are no historic towns within the area.
- 7.28 In terms of purpose five relating to assisting in urban regeneration by encouraging the recycling of derelict and other urban land, we would take issue with the Council as they have decided to use this as part of their scoring process. The extent to which the Green Belt will support urban regeneration can be difficult to quantify but it is generally recognised that Green Belt should encourage re use of urban land by limiting the availability of land outside the settlement.

Representations

- 7.29 We consider that the Council are misinterpreting this purpose of Green Belt through their scoring system. The objective of the purpose is to recycle derelict and other urban land which relates to land *within* an existing settlement boundary and so it does not apply to the re use of previously developed land in the Green Belt that is either adjacent to or remote from existing urban areas. To support our argument we refer to Rotherham Councils detailed Green Belt Review (March 2016) which dismissed this purpose as part of their assessment on the basis that they considered it impossible to judge how any given parcel of land within the Green Belt would contribute to the fulfilment of this purpose
- 7.30 Furthermore, the Planning Advisory Service published updated guidance for undertaking a review of the Green Belt in February 2015. They confirm that during the plan making process the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land and so the value of land parcels is unlikely to be distinguished by the application of this purpose. We would agree with these view and request that the Council remove this purpose from the scoring process. As part of reviewing Green Belt boundaries in terms of assessing whether changes should be allowed for new employment to be built in exceptional circumstances, consideration should also be given to identify areas of safeguarded land on the edge of settlements to meet the longer term development needs for housing and employment so that Green Belt boundaries last beyond the plan period.
- 7.31 Similar to identifying allocations, we would expect that safeguarded land designations to align closely with the settlement hierarchy and the transport network to reflect the underlying spatial and sustainability objectives of the plan. Within the Green Belt Review document there is no reference to the issue of safeguarded land and so it is unclear as to how the Council intend to deal with the matter, but it is an important consideration to ensure that once reviewed, the Green Belt boundary stretches well beyond the plan period.

Representations

Detailed Green Belt Review of Land to the south of Junction 35 of the M1 Motorway and to the south Smithywood Business Park Cowley Way, Sheffield (Green Belt Parcel S04101)

7.32 We have reviewed the relevant parcel of land against the Green Belt purposes and scoring criteria found within the Council's Green Belt Assessment Methodology. We set out our findings as follows:

Site Name: Smithywood Phase 2			
HELAA Ref: S04101		Green Belt Ref: S04101	
Green Belt Purposes	SCC Score	JEH Comments	JEH Revised Score
Purpose 1: to check unrestricted sprawl of large built up areas	5	We consider this parcel adjoins the existing urban area on at least 1/3 of its boundary.	3
Purpose 2: To prevent neighbouring towns merging into one another	2	We agree with this score assessment	2
Purpose 3: To assist in safeguarding the countryside from encroachment	5	The site is detached from the wider open countryside and rural landscape character is influenced by the enclosing urban features. areas. It does not performs a strong role in assisting in safeguarding the countryside from encroachment	4
Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	5	For the reasons given in our representations this purpose of Green Belt should not feature in the assessment.	0
Total Green Belt score	17		9
Robustness of Green Belt boundary	2	The M1 motorway boundary together with Jumble Lane and Loicher Lane would provide a robust and strong permanent edge to the urban land uses by utilising an existing physical feature.	Query the LPA's approach to scoring this aspect and recommend it should form part of the purpose 1 assessment

Representations

- 7.33 Based on the Council's assessment and applying our own score specifically to this site, it is clear that there are strong grounds to justify the removal of these sites as part of the overall Green Belt review as they make a very limited contribution to the five purposes of Green Belt.

Representations

8.0 Key Recommendations

8.1 We have demonstrated that the draft Local Plan does not meet the Government's test of soundness set out within the Framework for the following reasons:

- To reflect a more jobs led growth scenario target and to fulfil the aspirations of Sheffield in its potential to become a major economic city within the North of England, a proposed employment requirement of 170 hectares over the plan period is too low. This should increase to at least the 240 hectares as recommended within the ELR. We appreciate this figures is at the upper end of the range identified in the ELR. However, we recommend this higher provision should be allocated to ensure that there are a sufficient range and choice of sites available so that the availability of employment land does not unduly stifle Sheffield's ability to achieving its growth potential.
- The Council have no intention of meeting the longer term logistics needs for its own area, which will result in further constraints on business activity as confirmed by their consultant who prepared the logistic study.
- Contrary to the Council's view, the future development needs can only be met through allocations of land both within urban areas and through the release of Green Belt. The exceptional circumstances include:
 - The need to meet the need for employment land arising during the emerging plan period;
 - There is insufficient capacity within urban areas and outside of Green Belt to accommodate the objectively assessed needs of the City; and
 - Promoting sustainable patterns of development across the district through Green Belt releases.
- Informed by more robust evidence regarding the availability and achievability of sites, the Council need to focus and commit to the alternative approach of selectively releasing Green Belt land for development which would involve choosing the most sustainable locations as well as having the least harmful

Representations

impact on the purposes of Green Belt. Without considering the release of Green Belt sites to satisfy the employment need then the draft Plan the is unsound.

- We have demonstrated that the proposed employment site we are proposing as an extension to Smithywood Business Park makes no material contribution to the Green Belt and the revised Green Belt boundary would provide a strong physical feature to act as a defensible boundary in accordance with the NPPF. We have also shown the site is situated in a sustainable and accessible location in an area that is very attractive to locate strategic businesses given its close proximity to Junction 35 of the M1 Motorway.
- The site has a limited Green Belt function and its removal for an employment scheme would not materially harm any of the Green Belt purposes. We therefore considered this site is both suitable and available and should be seriously considered as a development allocation that can deliver the required level of growth in the right location over the plan period.
- There is also the possibility of a future rail or tram train connection to the site via the Chapelton to Meadow line and this should be included in the Plan as infrastructure for upgrading/reinstatement. This infrastructure provision would not only improve accessibility to the site and the existing adjacent employment areas but also open up the opportunity to extend the AMID in a northerly direction.

8.2 On this basis, we recommend the Smithywood Phase 2 site should be allocated for employment purposes to meet the required need over the plan period.