

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

Respondent details

Comment ID number: PDSP.084.002

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:

Trustees of the Bernard, 16th Duke of Norfolk 1958 Settlement Reserve Fund

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 SP2: Spatial Strategy

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

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

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

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

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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:

See Conclusion in the attached Report

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 proposed employment site allocation Ref: NWS04 is of strategic importance and therefore our comments should be considered in the context of the hearing sessions.

From: [REDACTED]
To: [REDACTED]
Subject: FW: Your response on Draft Local Plan -Trustees of the Bernard, 16th Duke of Norfolk 1958 Settlement Reserve Fund
Date: 20 February 2023 09:48:21
Attachments: [image001.jpg](#)
[Trustee 1958 Reserve Repts Sheffield Plan Publication Version Dec2022 Final 17022023.pdf](#)
[image002.jpg](#)

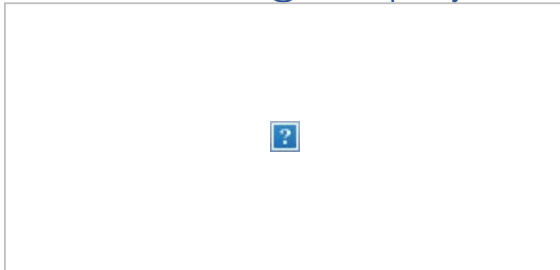
[REDACTED] (she/her)
Equalities and Engagement Officer
Equalities & Engagement Team
Policy, Performance and Communications
Sheffield City Council
Phone: [REDACTED]

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: 17 February 2023 11:08
To: consultation <consultation@sheffield.gov.uk>
Subject: RE: Your response on Draft Local Plan -Trustees of the Bernard, 16th Duke of Norfolk 1958 Settlement Reserve Fund

Dear Sir/Madam,

To accompany the representation form we have completed and submitted on behalf of Trustees of the Bernard, 16th Duke of Norfolk 1958 Settlement Reserve Fund below, please find attached the full version of our representations for your consideration.

Please confirm that these representations have been duly made.

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: Friday, February 17, 2023 11:03 AM

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 Planning Ltd

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.

Trustees of the Bernard, 16th Duke of Norfolk 1958 Settlement Reserve Fund

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 SP2: Spatial Strategy

Do you consider the Local Plan is legally compliant?

Yes

Do you consider the Local Plan is sound?

No

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

Yes

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

See attached Report with following contents. 1.0 Introduction.
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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.

See Conclusion in the attached Report

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 proposed employment site allocation Ref: NWS04 is of strategic importance and therefore our comments should be considered in the context of the hearing sessions.

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,...

[View Project](#)

Stocksbridge - new local bus service

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

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Representations

Client: Trustees of the Bernard, 16th Duke of Norfolk 1958
Settlement Reserve Fund

Proposal: Sheffield Plan Publication Version December 2022

Site: Land at Wardsend Road (Ref Nos S04102/NWS04)

Date: February 2023

Ref: JEH009



Representations
Document control

Document:	Representations		
Project:	Sheffield Plan Publication Version		
Client:	Trustees of the Bernard, 16th Duke of Norfolk 1958 Settlement Reserve Fund		
Job Number:	JEH009		
File Origin:			
Revision:	Final		
Date:	February 2023		
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 Trustees of the Bernard, 16th Duke of Norfolk 1958 Settlement Reserve Fund 'the Client' in response to the Publication Version of Draft Sheffield Local Plan that was released in January 2023 for consultation.

1.2 The Client has a landholding interest within the City of Sheffield with development opportunities that are both available and suitable to help contribute towards delivering the vision, objectives, and spatial growth strategy for the city within the identified Plan Period.

1.3 Previously under the name of Norfolk Estate, The Client has already been proactive in the emerging stages of the Local Plan process in particular the Issues and Options Sheffield Plan that was released in 2020. In addition, as part of the 'Call for Sites' HELAA process we have specifically promoted the site for development with reference number HELAA Ref: S04102 and known as Allotments to the South of Wardsend Road North S6 1LX.

1.4 We note that in the Publication Draft of the Local Plan this site is proposed as a strategic employment allocation (NWS04) and we support the principle behind this proposal.

1.5 Our client is firmly committed to unlocking the right kind of economic and sustainable growth for the region with the objective of achieving development allocations within key strategic locations of the City that reflect important spatial and sustainability principles. Our client fully embraces the local plan process of evaluating spatial strategies and this development prospect would deliver the right kind of economic uses to achieve the Council's objectives.

1.6 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 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 representations to draft policies in Part 1 of the Local Plan.

Representations

3.0 Part 1: Policy SA2 - Northwest Sheffield Sub-Area Site Allocations (Strategic Employment Site NWS04)

Overview

3.1 This sub area already includes extensive employment areas, and we consider that the proposed strategic employment allocation known as NW04 is required to continue to grow the economy in this area of the city. The location of the proposed employment allocation reflects the requirements of future businesses which will be influenced by site opportunities that have excellent connectivity to the main transport network.

3.2 The site 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.

Proposed Uses

3.3 At criterion b.) of Policy SA2, the Allotments to the south of Wardsend Road North, S6 1LX is specifically identified as a 'strategic site' (NW04) which we fully support. However, in Part 1 of this document it only becomes clear what types of uses would be appropriate on the allocation from the schedule at page 122 where it refers to 'Industrial'.

3.4 The Annex A: Site Allocation Schedule document provides further clarification of the employment use proposed for the site and these are limited to Use Class E(g) iii only which comprises any industrial process which can be carried out in any residential area without causing detriment to the amenity of the surround area.

3.5 Given the existing mixed use character of the surrounding area and the fact that the allocation is also proposed to forms part of a wider policy known as 'Flexible Use Zone – Policy NC16' we request that the proposed types of employment uses should be broadened to include the uses within the whole of Class E as well as Classes B2 and B8 subject to reasonable restrictions.

Representations

Evidence Demonstrating the Suitability and Deliverability of Allocation NW04

3.6 The site extends to approximately 2.35 Ha in area and accommodates 49 non-statutory allotment plots. Access is from Wardsend Road to the north although there is a right of access to the site to the south via Wardsend Road South.

3.7 Only a limited number of allotment plots are being used for appropriate horticultural uses within the terms of their original allotment lease. Many plots have been incrementally developed over the years accommodating significant makeshift buildings and structures with high boundary hedges and fences.

3.8 To the north lies a three-storey building that accommodates Sheffield Health and Social Care together with open scrubland to the west of Wardsend Road North. The east boundary is defined by the railway line and beyond lies Binsted Housing Estate. To the south lies vacant scrubland and a disused car park with access to these areas achieved from Wardsend Road South. To the west lies a belt of mature trees and an electricity pylon and overhead line beyond which lie the large manufacturing premises of Hillfoot and Murray Plate and Profiles which front on to HERRIS Road and the A61 respectively.

3.9 The whole site is subject to a lease to the Wadsley Bridge Allotment Society (WBAS) who in turn sublet the individual plots. From aerial photographs available on Google it can be seen that many of the plots have structures that do not have planning consent nor comply with building regulations.

3.10 Various allegations have been raised and are currently being investigated by different authorities concerning the activities taking place from a number of the plots. There is suspected illegal business activities being conducted by the tenant of these plots.

3.11 We consider there would be significant benefits in redeveloping the site as it would remove illegal business activities that are suspected of taking place on many of the plots in contravention of the lease.

Representations

3.12 Furthermore, the Site Selection Methodology Site Appraisal confirms that whilst this allotment site is identified as Open Space in the adopted UDP, it is surplus for its current open space function. We would agree with this assessment in terms of both the quantitative and qualitative functional open space value of this site in terms of its current use.

3.13 The site lends itself to be a strategically well placed employment site due to its good level of accessibility to the A61 and its association with the successful business adjoining the site.

3.14 There are no significant highway issues in principle to developing the site. Access could be gained for the potential uses via Wardsend Road North.

3.15 Due to funding opportunities that are at an advanced stage there is a strong possibility of the Don Valley line between Sheffield and Stocksbridge could be re-opening for local passenger services. The scheme has been shortlisted to progress to the next stage of the Government's *Restoring Your Railway* funding initiative designed to reinstate local railway services and restore closed stations. The funding bid includes a proposed new station at Wadsley Bridge which is in close proximity to the Wardsend Road site and further improve its overall accessibility.

3.16 We note from the Council's assessment that the site is in an ecologically important area for species and/or habitat connectivity (Railway line and Oxspring Dam to Bagshaw Wood). The Council request that connective ecological corridors/areas (including buffers) shown on the Local Nature Recovery Strategy and combined natural capital opportunities are to be maintained on site and removed from the developable area. We accept this approach in principle and the proposed scheme will be informed by an ecological assessment which will incorporate a biodiversity net gain strategy.

3.17 In terms of the other proposed conditions on development identified in the draft Plan relating these relate to assessing land contamination and conducting a staged archaeological evaluation. We do not quarrel with these requirements that should be undertaken prior to the submission of a planning application.

3.18 In summary, we consider that the proposed employment allocation would perform a key strategic role in association with the existing surrounding employment area to help Sheffield City achieve its economic growth ambitions.

Representations

4.0 Part 2: Policy NC16: Development in The Flexible Use Zones (Outside The Central Sub-Area)

4.1 These Flexible Use Zones cover the areas outside the Central Sub-Area where a mix of residential and commercial uses can take place. We support the inclusion of allocation NWS04 within this zone but as requested in our representation to Policy SA2, we consider there is no reason to preclude proposed Class B2 or B8 uses as the site does not have a strong relationship with the existing housing development to the northeast given a railway line separates the two areas and appropriate migration measures to safeguard the amenity of the existing residential occupiers could be introduced.

4.2 Furthermore, from reading Policy NC16 in conjunction with Policy SA2 we consider further clarity in the Plan is required. Within the Flexible Zone there is scope to allow a range of alternative acceptable uses in addition to the 'Industrial use' identified in Policy SA2. We welcome the opportunity to allow a greater range of potential alternative uses on the site, but we question the relevance of the Flexible Zone Policy if the Council only intend to allow Industrial development on the allocation. Adopting a strict interpretation of what constitutes an industrial use would send out a mixed and confusing message in terms of achieving the objectives of the two policies.

4.3 Within the current adopted UDP the surrounding commercial uses are all identified under the same General Business Use designation which allows a range of uses under Policy IB5 which is straightforward to interpret. With the introduction of Strategic Employment Allocation NW04 and the flexible zone designation careful consideration is required to ensure there continues to be sufficient clarity as to range of uses that could be considered acceptable.

Representations

5.0 Part 1: Policy SP1 Major New Transport Infrastructure

- 5.1 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 recommend that using the existing railway line infrastructure should be a key priority of the Local Plan.
- 5.2 The Local Plan should also recognise the funding bid that is actively being pursued by South Yorkshires Mayoral Combined Authority in relation to the Don Valley line. SYMCA submitted a Strategic Outline Business Case to the DfT in 2022 to re-open the Don Valley line between Sheffield and Stocksbridge for local passenger services. The scheme has been shortlisted to progress to the next stage of the Government's Restoring Your Railway funding initiative designed to reinstate local railway services and restore closed stations. The funding bid included a proposed new station at Wadsley Bridge which is in close proximity to the Wardsend Road site.
- 5.3 There are reasonable prospects that this infrastructure will be delivered during the plan period and this should be identified in the Policy SP1. Furthermore, development along these improved 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 new station.
- 5.4 It is also important to consider this proposed transport initiative in the context of ensuring that that this area 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

6.0 Conclusions and Key Recommendations

6.1 This is a formal response to the Publication Draft Sheffield Local Plan submitted on behalf of Trustees of the Bernard, 16th Duke of Norfolk 1958 Settlement Reserve Fund specifically in relation to the promotion of Site Ref: S04102 known as Allotments to the South of Wardsend Road North S6 1LX.

6.2 The site has been identified in the Plan as a strategic employment site allocation within Policy SA2 and known as NW04. We welcome and support the principle of this designation.

6.3 The site is situated in a sustainable and accessible location in an area that is attractive to locate strategic businesses given its close proximity to other business and to the transport network. The proposed allocation would therefore help Sheffield City achieve its economic growth ambitions.

6.4 With the introduction of both Strategic Employment Allocation NW04 and the Flexible Zone designation (Policy NC16) across the site careful consideration is required to ensure there is sufficient clarity as to range of uses that could be considered acceptable.

6.5 Having regard to the site characteristic and the surrounding area we recommend that in addition to Industrial development it is appropriate to consider a more diverse range of acceptable commercial use to maximise this opportunity so that it can make a meaningful contribution towards satisfying the city's economic growth objectives.