

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** Sheffield Plan consultation response - Hallamshire Historic Buildings  
**Date:** 16 February 2023 17:19:23  
**Attachments:** [HHB draft Sheffield Plan Reg 19 Consultation Form - Parts A and B.pdf](#)

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Dear Sheffield Plan team

Please find attached a consultation response to the draft Sheffield Plan from Hallamshire Historic Buildings.

Yours sincerely

Robin Hughes

Committee member, HHB

## 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](mailto:sheffieldplan@sheffield.gov.uk)
- post to: **Strategic Planning Team, Planning Service, 4<sup>th</sup> 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](mailto:sheffieldplan@sheffield.gov.uk) or by calling 0114 2735897.

Please tick/ delete as appropriate:

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

Yes

No

Please tick as appropriate to confirm your consent for Sheffield City Council to publish and share your name/ organisation and comments regarding the Sheffield Plan.

I confirm my consent for Sheffield City Council to share my name/ organisation and comments regarding the Sheffield Plan including with the Planning Inspectorate.

Yes

No

Please tick as appropriate below if you wish to 'opt in' and receive updates and information about the Sheffield Plan.

I would like to opt in to receive information about the Sheffield Plan.

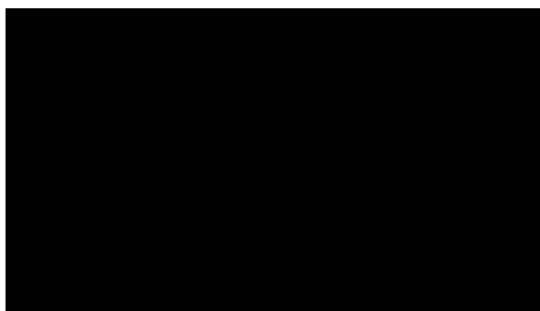
Yes

No

Printed Name: Robin Hughes

Signature:

Date: 16/02/2023





**This form has two parts:**

**Part A - Personal details – need only to complete once.**

**Part B - Your representation(s) - Please fill in a separate sheet for each representation you wish to make.**

## Part A- Personal Details

### 1. Personal Details

Name: Robin Hughes  
Organisation (if applicable): Hallamshire Historic Buildings  
Address: 15 Towngate Road, Worrall, Sheffield  
Postcode: S35 0AR  
Tel:   
Fax:  
Email: 

### 2. Agent Details (if applicable)

Agent:  
Organisation (if applicable):  
Address:  
Postcode:  
Tel:  
Fax:  
Email:

## Part B - Your representation

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

Name or Organisation: Hallamshire Historic Buildings

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

Policy Number: DE9

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 | <input checked="" type="checkbox"/> |
|   | No  | <input type="checkbox"/>            |
| 4.(2) Sound                               | Yes | <input type="checkbox"/>            |
|   | No  | <input checked="" type="checkbox"/> |
| 4.(3) Complies with the Duty to Cooperate | Yes | <input checked="" type="checkbox"/> |
|   | No  | <input type="checkbox"/>            |

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.

HHB considers that the draft Sheffield Plan is unsound because it makes insufficient provision for conservation and enhancement of the natural, built and historic environment as required by the National Planning Policy Framework paragraph 20(d). It falls short as follows:

(1) There is no provision for areas of special architectural or historic interest to be identified and designated as Conservation Areas, as required by the Planning (Listed Buildings and Conservation Areas) Act 1990 s69(1). In particular, it does not include the designation of the Castlegate area, which has already been identified by the Council as meriting designation. Given the Council's publicly stated intention to designate this area, its absence from the plan could be misleading to developers. It also does not provide for the appraisal of Areas of Special Character, which were identified in the Unitary Development Plan of 1998 as potential candidates for future designation, and about forty of which have not been appraised.

(2) Protection will be removed from about forty Areas of Special Character. These are created and protected by saved policies BE15 and BE18 of the Unitary Development Plan of 1998, but are not mentioned in the draft plan. Areas of Special Character are non-designated heritage assets some of which are considered likely to merit statutory protection as Conservation Areas and all of which are of local importance. The failure to maintain or enhance their protection is a significant reduction in the effectiveness of policy to conserve the historic environment.

(3) There is no policy relating to the special importance of heritage assets on the Local Heritage List or for its maintenance and expansion. Locally listed assets are mentioned briefly in draft policy DE9, but the plan does not make any other reference to the existence of the Local Heritage List, which was formally adopted by Sheffield City Council in March 2022. The special local significance of assets on the list requires that decisions give their conservation greater weight. It is also important that when further suitable assets are identified these are added to the list.

(4) Sheffield is fortunate in having one of the country's first industrial Conservation Areas designated in 1985, a type that is still rare, there being only three nationally with "industrial" in their names. Kelham Island Industrial Conservation Area is at risk of losing entirely its industrial character through the now almost complete loss of industrial activity within the area, but the plan makes no provision to conserve or enhance accommodation for the traditional trades that give the area its name.

**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.

HHB proposes that policy DE9 is modified as follows:

(1) Include a specific requirement for the Council to meet its statutory obligations by designating the Castlegate area as a Conservation Area; proactively seeking new areas to designate as Conservation Areas, including amongst Areas of Special Character; and designating these promptly. There is a particular opportunity to make provision for conservation and enhancement of the natural, built and historic environment that is especially distinctive to Sheffield by appraising the historic river valleys and their industrial remains, with particular regard to waterpower infrastructure, the metal trades and ancillary industries including the refractory industry.

(2) List the forty non-designated Areas of Special Character and provide the same or a better level of protection as that currently afforded by UDP policies BE15 and BE18. If it is not possible to replicate these UDP policies, an alternative might be to add these areas to the Local Heritage List, so long as the policy also protects the special significance of locally listed assets.

(3) Include a recognition of the special local significance of assets on the Local Heritage List and an expectation of the conservation or enhancement of their significance and that of their settings; provide for the addition of newly-identified assets to the list; make applicants and the Council responsible for proactively identifying such assets and submitting them to the defined assessment process; and (unless otherwise provided for) add the forty non-designated Areas of Special Character to the list.

(4) Make provision to conserve and enhance accommodation for traditional industries compatible with other uses in Kelham Island Industrial Conservation Area and any other existing or future Conservation Areas which derive any of their significance from industry.

**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:**

HHB believe that by participating in examination hearings we can better represent the views of our members and explore the detail of our concerns regarding the draft Sheffield Plan and our proposed remedies for these.

Founded in 1971 the Hallamshire Historic Buildings Society is a Registered Charity (No. 501651). Our aims are:

- To protect the heritage in and around Sheffield.
- To promote interest and pride in architecture and local history.
- To increase public awareness of our historic past through its buildings.
- To conserve whatever is beautiful in our environment and to improve that which is not.

We represent our membership which currently numbers 267 by contributing to public meetings and inquiries, through our seat on the Council's Conservation Advisory Group (CAG), and by making representations on planning applications and local authority proposals.

**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.