

Local Plan submission – Main Modifications consultation

1.0 Introduction

Following the Planning Inspectorate's letter to Sheffield City Council on the 16th January this is my formal submission in this latest consultation.

My submission is split into three main sections that cover general comments that do not directly relate to the main modifications and newly released documents but I believe are still relevant, specific concerns with the latest stages of the Local Plan including new information that has come to light on one of the sites, before a closing summary of my position.

2.0 General commentary

I preface these comments with the acknowledgment that the Planning Inspector's letter is not their final report and only an intermediary point in their process. However, I do have grave concerns that neither the general points raised by myself and many other residents, nor our technical issues with particular sites in the Local Plan were addressed.

For the sake of transparency, accountability and fairness residents and I need to see our specific objections and concerns responded to. I accept that may not be at this juncture in the Local Plan, but I expect to see these answered in the final report.

As of right now I am still at a loss as to how this decision was made by the Inspectorate given the fundamental constraints raised around these sites. We must see the Inspectorate's view of these so we can understand the rationale behind the decision made.

This same concern applies to Eckington Way. Given the fundamental constraints raised about the site such as its topography, pylons and shallow gas main running through the site and road network reaching 100% capacity I am also shocked the Inspectorate would consider this site viable deliverable, and sustainable

I also want to take this opportunity to highlight how the Council have (deliberately) deployed flawed reasoning to reach the conclusion they wanted to. It was argued that Eckington Way was to remain due to there being no other available land, yet when green belt release was seen as necessary the very site we had asked the Council to consider was discounted because the Council said Eckington Way was already in the Local Plan.

I find this deeply cynical and reflective of a Council that had already made up its mind, rather than having a genuine conversation and consultation with local communities. Instead of working for and with our communities to find a more acceptable proposal they pressed on with what they had already decided upon. I cannot help but be deeply cynical of this move and how poorly it reflects upon the whole Local Plan process.

While the last point is an issue I have with the Council acting poorly and not necessarily something the Inspectorate would take a direct view on in their final report, I hope the other issues raised will be covered so we can at least understand the Planning Inspectorate's reasoning.

3.0 Specific issues with the Main Modifications

3.1 Gaps in information

Despite the significant amount of information provided in this Local Plan process I also am concerned that there are still gaps in information that need to be highlighted.

There was the expectation that these main modifications would have been an opportunity to provide updated documentation. This has not happened. For example, there the specific concern regarding Yorkshire Water owned land on the SES29 site that would have direct implications over the developable space available. As far as I am aware the Council are aware of this but have not offered any amendment to the site despite recognising the ownership is more complicated than previously thought.

Secondly, there are significant pieces of work that are entirely absent from the documents provided by Sheffield City Council. For instance, it would have been useful to reflect on the current usage of these green spaces (SES29, SES30, SS19). I know that the Beaver Hill site is used regularly by residents, something the Planning Inspector themselves admitted at the Hearing. I say this considering my previous remarks on the importance these spaces provided during the pandemic. This should also play a role in the decision-making process but is absent from the Council's submitted documents.

3.2 New information

While the reason for this consultation is to consider the further published documentation regarding the plan there are two new developments that I do think are materially relevant for the Planning Inspectorate to consider relating to two of the sites.

The first of these relates to SES30 where a recent successful application to South Yorkshire Heritage List has identified a Quaker burial site in the North East portion of the site. This is the same area where one of the access points to the proposed housing estate has been proposed.

Alongside all the other constraints with this site I must repeat that this site is simply not deliverable. The section that the South Yorkshire Heritage site would cover makes it exceedingly difficult to deliver a coherent access point to the site that could hand the amount of traffic expected from the development.

In addition, I am aware there is further work to get heritage recognition for the site of the "Battle of Orgreave" as well which, if successful, will also have consequences for the deliverability of the Handsworth Hall Farm site (SES29).

Together, this represents yet another fundamental constraint on SES30 and possible constraint on SES29 that brings into question how deliverable these sites are in this Local Plan.

The second new development that I want to draw attention to is a recently announced site (Ref: 45900) in North East Derbyshire's Local Plan that is situated immediately over the border to Sheffield and in close proximity to SS19 which is the proposed housing site off White Lane.

I recognise that individual local authorities are responsible for their own plans, but there needs to be some understanding that there will necessarily be mutual causes for concern when there are developments on an authority's immediate border and that the cumulative effect it has for the area.

This case of both SES30 on White Lane and Ref:45900 from North East Derbyshire should trigger a further rethink by both sides as to how both developments will impact the local infrastructure. It cannot be the case that both are allowed through without the consideration of the other. I trust this is something the Inspectorate will now look at.

I have said before that I can see a Local Plan where development on White Lane could be acceptable, however this latest addition moves us further away from that not closer. Especially given my other concerns I remain deeply sceptical that the current site is suitable or deliverable for the area.

Another new development that has come to light is EXAM 216. Assurances had previously been given that there would be funding available for road upgrade works and transport improvements. I did highlight in my previous submission that this was not the case. To add to that, EXAM 216 outlines that one of the vital schemes for the area to improve road capacity has been withdrawn by the Government due to a lack of local funding to contribute to the scheme.

This is obviously disappointing but understandable given the constraints we face on spending currently. It does though again undermine the idea that significant infrastructure work will happen soon to accommodate the two very large Handsworth developments. Wishful thinking has already led us to a breaking point where the local transport infrastructure cannot cope with what development there already is, we cannot allow it to continue and allow further development with no transport plan to accommodate it.

Finally, and while I recognise this is not materially new information following your latest judgement letter there has been some excellent work by local residents in my constituency that questions some of the assumptions made in the Local Plan itself. Chiefly that is the incredibly unambitious housing density figures the Council have arrived at.

I have included this as a separate document, but it very concisely shows that Leeds as a comparable city to Sheffield has a far higher density in housing than Sheffield when it comes to developing land for housing. I am not necessarily saying Sheffield can exceed or match Leeds exactly, but it is distinctively unambitious in its Local Plan figures.

Finally, just to again reflect on the poor reasoning SCC have employed throughout this process, I also attach a document that examines the agricultural grade of the land being put up for development. Specifically, SES30 is predicted to have some of the highest scoring land for this use.

I am not an alarmist over our food security, broadly I think the current split between imports (60% approx.) and exports (40% approx.) is sensible. However, given that this will be a permanent development I do not understand why our best farmable land is what the Council seem to be suggesting we develop on first. I raise this especially in contrast to Ryecroft Farm in Dore which I know I have mentioned previously during my written and oral submissions and is predicted to contain much poorer agricultural land.

I recognise that some of these points may not be material to the main modification, but I continue to be utterly bewildered to see no strong justification from the Council regarding the sites in my constituency, and a distinct lack of justification for excluding others like Ryecroft.

4.0 Summary

I want to begin my concluding remarks with what I have said from the beginning of the green belt release. I do accept that we must build on green belt. Where I will commend the Council is they have genuinely taken a brownfield first approach. My office and I are yet to find a brownfield site that is not already allocated, unsuitable for development, or part of the windfall provision outlined in the Plan.

However, the distribution of green belt sites remains incredibly unfair on the South East and North East of the city which remain the poorer parts of Sheffield compared to the more affluent West. On that basis I cannot tell my constituents this Local Plan is fair.

This further submission I hope reinforces my deeply held misgivings about the current Local Plan and that the Council have failed to justify their decisions to show this Local Plan is positively prepared and effective, and for specific sites that they are even deliverable. The main modifications do not answer these questions either and leave me deeply confused as to how we have got here.

Finally, there has been new information that is materially relevant to the Local Plan such as the development proposed by North East Derbyshire and the Heritage application for the Quaker Burial Ground that the Inspectorate must consider.

I will of course await the final report and trust that the objections I and my constituents have raised will at last be responded to there, but I do remain deeply sceptical that this Local Plan is fair or takes into account quite technical and valid issues with some of the sites included.