

Sheffield Plan: Responses to Questions submitted at the Public Question and Answer Session 1 (3rd September 2020)

- 1. Do you have a digital map/interactive map showing the new proposals, or showing the current local plan designations and other matters? The only detailed map I could see online are those from the UDP in the 1990s, which are quite out of date by now, and also a 'core strategy diagram' from 2009 local plan, which is an overview, not a detailed map. Most councils have a map online where items such as listed buildings, floor risk areas, and zones designated for various types of development etc are shown. Something like this would be useful to better understand the proposals and be able to comment best on the consultation.**

Answer: The Issues and Options document is not a Draft Local Plan so, at this stage, there is no digital interactive map showing different designations, etc. The Publication Draft Sheffield Plan (scheduled to be published in July 2021) will include a new 'Policies Map' that will replace the Proposals Map that was produced as part of the UDP. There will also be a new Key Diagram to replace the one in the Core Strategy.

The [Housing and Economic Land Availability Assessment \(HELAA\)](#) includes a map that shows all the sites that have been proposed for development by landowners and developers, as well as some land identified through our own surveys. It also shows sites that already have planning permission. Question 24 in the Issues and Options document asks which of the sites identified in the Housing and Economic Land Availability Assessment are suitable and available for development. We will use responses to that question to help us decide which sites should be proposed as allocated sites in the Publication Draft Plan.

- 2. What is your view on the new Permitted Development Rights and new Use Class Order changes, which have recently come into force? (eg, allowing demolition and rebuilding of certain buildings to provide housing, easier changes between different Use Classes, and additional storeys on top of certain buildings, all without requiring planning permission). How do these affect your plans?**

Answer: The Sheffield Plan will be unable to influence the implementation of the new Permitted Development Rights. As we prepare the draft Sheffield Plan in the coming months we will take into account any Government guidance that emerges in relation to the recent changes to the Use Class Order. Although changes within the new Class E will no longer constitute 'development' we will be looking at how we can still meet our objectively assessed needs for retail, offices and industrial space as required by the National Planning Policy Framework.

- 3. What is your view on the government's proposed changes to planning system which is currently under consultation (Planning for the Future White Paper)? How does this affect your plans?**

Answer: Some initial observations on the Government White Paper are included in the presentation given during the webinar. We have set out some possible implications for the Sheffield Plan. There is a lot to absorb in the White Paper but, for many aspects of the proposals, it is short on detail. We expect more information from the Government to become available over the coming months.

- 4. Is the intention to decide at the end of this options consultation, ending mid-October, whether to proceed with Option 1,2 or 3 for housing provision, and that in the later consultation on the draft plan (summer 2021) the plan will have incorporated the winning one of those options?**

Answer: Essentially yes. But the actual option that is taken forward could fall between either Options A and B or between B and C.

- 5. Did you say Regulation 18 consultation? Have you link to what that means?**

Answer: The process for preparing local plans is set out in the [Town and Country Planning \(Local Planning\) \(England\) Regulations 2012](#). Under Regulation 18 stage local planning authorities are required to consult on what the plan ought to contain. There is considerable flexibility in terms of the format of that consultation.

- 6. What restrictions are in place to ensure no conflict of interest between the planning department and building companies?**

Answer: The Planning Service recognises the significance and importance of this issue. It has had considerable experience of successfully managing potential conflicts of interest in the past and there are a number of processes and working practices as well as organisational separation of functions and roles in place to prevent such conflicts.

All officers as council employees are bound by the Sheffield City Council Code of Conduct which includes requirements regarding conflicts of interest. Every Head of Service, Director and Executive Director is responsible for monitoring their employees activities; making sure they have kept to this Code of Conduct for Employees and any other Codes and made declarations when they need to. The Code of Conduct for Employees also states that staff are responsible for the information that they handle for, or on behalf of, the Council and they must ensure it is safe from unauthorised access, use, alteration, disclosure or deletion.

All officers have to complete a Declaration of Interest on an annual basis and more frequently if their circumstances change. These are required and held by HR (Human Resources Service). This includes financial conflict of interest direct or indirect, land ownership, membership of groups and relevant family or friendship relationships. All Declarations of Interest are monitored and reviewed by their manager and if necessary would be escalated up to the Head of Service Planning and Legal Services as required. This seeks to ensure we identify and manage such conflicts so as to eliminate them as far as possible.

The Council has information policies that must be adhered to including: the Information Governance and Security Policy, ICT Acceptable Usage Policy and Data Protection Policy.

Where necessary an internal 'firewall' is established to avoid conflicts of interest. A 'firewall' can be described as an information communication barrier implemented within an organisation to prevent exchanges of information that could lead to conflicts of interest.

It is also important to note that formal Examination of the Sheffield Plan and all Local Plans will be via the independent HMS Planning Inspectorate and all material must be collated and provided as part of that formal Examination. Site allocations have to be supported by a rigorous evidence base (i.e. a robust case needs to be made using the published Site Selection methodology as set out in the Background documents whilst adhering to all legal and planning requirements). A decision regarding a site based on anything other than those factual criteria is likely to be challenged by the Inspector.

The Council is committed to sound corporate governance and supports the Nolan Committee's 'Seven Principles of Public Life' for the conduct of Council Members and Employees; namely:

- **Selflessness** – Making decisions based solely upon the public interest
- **Integrity** – Not engaging in financial or other obligations with external parties which may influence decision making in the workplace
- **Objectivity** – Making work-related choices solely on merit
- **Accountability** – Exposing one's actions and decisions to an appropriate level of public scrutiny to demonstrate their propriety
- **Openness** – The ability to justify decision making via logical argument. Only restricting information if wider public interest demands this course of action
- **Honesty** – Declaration of private interests and addressing conflicts to protect the public interest
- **Leadership** – Promotion of the above principles by example

7. Are systems in place to prevent builders from influencing release of green belt land?

Answer: See answer to Question 6 above.

8. Don't see any heritage or environmental groups being consulted

Answer: We are engaging with Historic England and Natural England as part of the duty to cooperate with prescribed bodies.

We are also actively engaging with Sheffield Wildlife Trust on a number of issues through the South Yorkshire Local Nature Partnership. The Local Nature Partnership is a network of public, voluntary and private organisations that are working together to achieve their common vision around the natural environment.

See also answer to question 12 below.

9. What about Joined Up Heritage and Sheffield Wildlife Trust rather than National groups?

Answer: See answers to question 8 above and question 12 below. Joined Up Heritage are not a statutory consultee, but as with other interest groups in the city we will aim to make sure that they are aware of this consultation.

10. Do you plan to engage with grassroots heritage organisations some of whom are very substantial, such as Joined Up Heritage Sheffield or the Civic Trust?

Answer: See also the answer to question 12 below.

11. Are you planning to put your work out to young people forums and organisations, for example, Sheffield Futures, as it could be said they have to most to gain from an improved City?

Answer: The Sheffield Plan will set the planning framework for the future of the city for the next 25 years. This means it is important to seek the views of young people and to encourage them to participate in completing the survey by using targeted publicity methods. Details of the consultation will be shared on the council's social media channels. It is hoped that this method of publicity will encourage young people to complete the online survey when they are using social media.

12. Can you confirm that all the suggested groups mentioned by today's attendees will be contacted directly for consultation?

Answer: Yes, we will contact the groups that have been mentioned. Some of them are on the Sheffield Plan mailing list so will already have been made aware that the consultation is taking place. Representatives from the groups are welcome to participate in the webinars being held on the 16th and 23rd September 2020.

Due to the large number of organisations in the city, it is not possible to engage with each one individually but we will try to accommodate requests for meetings where resources allow.

13. Is consideration given to existing utility capacity within the area the potential building proposals may be requested (i.e. power, sewage etc)?

***Answer:** Utilities providers have been invited to comment as part of this consultation. They may also wish look at the Housing and Economic Land Availability Assessment (HELAA) document that has been published as background to the emerging Plan and provide comments on the sites identified. These comments will be considered when we propose site allocations for the next consultation on the Regulation 19 draft Plan.*

14. What steps have you taken and will you be taking to include accessibility in the plan?

***Answer:** The current Local Plan includes a number of policies which aim to achieve better access for disabled people. These include ensuring access to new public buildings and places of employment, as well as ensuring that new public space and public realm is accessible. We intend to carry these requirements forward, with some minor amendments, in the Sheffield Plan.*

We also intend to introduce new policies that will require all new homes to be 'accessible and adaptable' (Category 2 under the Building Regulations Optional Technical Standard M4) and a proportion of homes to be wheelchair accessible or easily adaptable for wheelchair users (Category 3). These requirements cannot be applied until a policy requiring their application has been included in an adopted local plan.

An outline of the proposed scope of the Sheffield Plan policies is available on the website.

However, please note that the Government's Planning White Paper proposes that development management policies will be set nationally. This could mean that locally set policies dealing with accessible design could be deemed by the Government to be unnecessary.

15. Will you consult with actually disabled people on infrastructure like roads, pavement, kerbs, parking, access to businesses and housing to ensure an actually accessible-to-all city?

***Answer:** We are consulting with the Access Liaison Group as part of this consultation and will be involving them in drafting the policies that are included in the Publication Draft Sheffield Plan (see answer to Question 14 above).*

From an access to jobs, training, healthcare, education and general public amenities perspective, the local plan seeks to focus development in locations where these services are accessible. This follows national planning policy guidance and more general sustainable planning objectives to ensure development outlined in Local Plans reduce the need for car based trips by promoting development in locations with access to public transport services.

In relation to specific scheme design, this is not specifically a Local Plan issue, however, this is highlighted in the Sheffield Transport Strategy which is one of the supporting documents. Through working with Transport 4 All and the Access Liaison Group, a number of changes were made to supporting inclusive design. The aims and objectives reflect that the design of infrastructure and services needs to address the needs of disabled people, and that they are actively involved in achieving this. The objective under 'Being Inclusive' includes "Ensure that the design of transport infrastructure, services and information removes and minimises inequality, and to actively advances equality – which requires disadvantaged people are actively involved in achieving this."

A new policy was also created in respect of ensuring that we do not disadvantage, and that we advance equality for, people with protected characteristics and other disadvantaged people, including disabled people. Policy 9C states "We shall involve disadvantaged communities and their representatives in the development of our interventions, to ensure they reduce inequality, and actively advance equality, and to ensure inclusive design."

16. How does one become involved with the Access Liaison Group?

Answer: *Please email the Sheffield Plan mail box and we will pass your details on to the Access Officer within the Planning Service.*

Whilst interest in joining the Group is very welcome, please also note that the Terms of Reference do allow for limiting numbers in order retain a balance of different disabilities and get through business.

17. To what extent will universal design play a part in the plan?

Answer: *please see answer to Question 14 above.*

18. How is Class E in the Use Class Order going to be taken into account in retail/office and business preferred locations queries?

Answer: *As we prepare the draft Sheffield Plan in the coming months we will take into account any Government guidance that emerges in relation to the recent changes to the Use Class Order. Although changes within the new Class E will no longer constitute 'development' we will be looking at how we can still*

meet our objectively assessed needs for retail, offices and industrial space as required by the National Planning Policy Framework.

19. Is the HELAA set in stone, or are you open to further suggestions from members of the public (not owners of sites) as to brownfield sites, large and small, that could be redeveloped for housing and help meet the 20,000 target for the existing built-up area?

***Answer:** We always welcome suggestions for new development sites, particularly when ownership and availability is known, and are often made aware of new opportunities. Any new sites that are sent in, will be included within the next version of the HELAA if appropriate. In addition to this, we do make a small allowance for the number of homes that we expect to come forward on 'windfall' sites that we do not yet know about. This reflects the fact that in a large city such as Sheffield we are not realistically able to identify every single site that may come forward, particularly through redevelopment.*

20. How does one contact the older persons' forum?

***Answer:** Normally, we would contact the various equality forums via the [Equality Hub Network](#). Following concerns raised at the Equality Hub Network Board last year, an appraisal of the Equality Hub Network (EHN) has been undertaken in order to clarify the role and purpose of the Network; and, establish whether its existing structures are fit for purpose. The EHN Board will not exist in the same way going forward, although there will be many opportunities to get involved.*

The Council remains committed to making sure there is dedicated equalities based work around engagement and influence in the city and we have had discussions with the six EHN support organisations about arrangements for the next 12-months.

These organisations are:

- [Age UK](#) (older people)
- [Sheffield Futures](#) (younger people)
- [FaithStar](#) (BAMER, Belief and Religious groups)
- [Disability Sheffield](#) (People with Disabilities)
- [LGBT Sheffield](#) (LGBT)
- [Together Women](#) (Women)

The agreed new approach will include a strengthened role for support organisations and an increased focus on joint working. The priorities will be working with our communities in the response to COVID-19, council consultations and how we work within local communities.

While work is ongoing to agree and implement this new way of working, we suggest the best way of contacting the older persons forum would be by contacting the Sheffield Branch of Age UK (older people), who together with Sheffield Futures (younger people), supported the EHN's Age Hub (intergenerational).

You can contact Sheffield Age UK by telephoning 0114 250 2850. Alternatively, you can email enquiries@ageuksheffield.org.uk, or visit the Sheffield Age UK website via the above link.

Similarly, we suggest that until the EHN is relaunched, the best way of contacting other equality forums would be to contact the relevant support organisation via the above links.

21. Sheffield City Region Strategic Economic Plan (SEP) is out for consultation to September 18th to cover period of 2020 – 2040 but there is no mention of the 70,000 job target in that draft plan. Will the Reg 19 Draft Plan be updated to reflect the emerging SEP? Are Sheffield City Council putting forward representations to continue to support that job growth?

Answer: The Sheffield share of the 70,000 jobs target (25,550) was considered as one of the 7 Scenarios when assessing the Economic Land Need for the Plan. The Government's Planning Practice Guidance encourages local planning authorities to use a range of methodologies when assessing economic need. Details of this forecasting are set out in the Employment Land Need and Supply Technical Note that was published as a background document. While the new draft SEP does not propose specific job targets, a 'policy on' approach is one of the methods promoted in the PPG so we consider it to still be appropriate.

We don't consider there will be a specific need to 'update' the forecasting we have used based on the new draft SEP, as there are several methods used and we have selected an economic land need figure based on a range of forecasting scenarios. We may need to give some thought in the Regulation 19 Plan to the economic impact of the Covid situation when that has possibly become clearer nearer the time of that consultation – this is also explored further in the Technical Note.

We are supporting the draft SEP approach to ensure future economic growth is inclusive.

22. The Housing and Economic Land Availability Assessment (HELAA) purports to identify all the land that is potentially available for development but does not include Green Belt sites. Will there be detailed site appraisals (akin to the SHLAA level of detail) published for Green Belt sites not assessed in HELAA and HELAA sites beyond that identified in the

accompanying spreadsheet? This would assist in answering question 24 of the Issues and Options Report and also be a direct outcome from the Call for Sites process earlier this year.

Answer: There are no plans at the current time to present any more in-depth assessment of sites in the Green Belt. Green Belt sites that are known to be 'available' (received through the 2019 call for sites) are shown on the map found here: <https://www.sheffield.gov.uk/home/planning-development/housing-land-sites.html>

The site selection methodology technical note outlines the issues that will be considered if we need to release land from the Green Belt to deliver new homes, and exceptional circumstances can be demonstrated.

The reason that the HELAA does not yet include an assessment of suitability and deliverability of land in the Green Belt is that there has not yet been a decision made on whether we need to release Green Belt land. Until that point there is a major policy constraint that precludes delivery of homes on most land in the Green Belt. In terms of assessing which might be the best options for delivering new homes on land currently in the Green Belt (if we conclude exceptional circumstance exist to alter the boundary); that work will take place later in 2020 and early 2021 as part of preparing the Publication Draft Sheffield Plan.

23. In respect of Office, Retail and Employment land questions is there an intention to review the approach set out in light of Use Class Order changes and introduction of Class E? A Class E style allocation for Commercial, Business and Service uses which would enable flexibility for use but there does not appear to be any control over the continued use in either shops, office or gyms etc. Understanding the intended approach to this in the meantime would assist in answering question 14, 15, and 16 of the consultation.

Answer: Although changes within the new Class E will no longer constitute 'development' we will be looking at how we can still meet our objectively assessed needs for retail, offices and industrial space as required by the National Planning Policy Framework. Please answer questions 14, 15 and 16, as best you can, with that objective in mind. As we prepare the draft Sheffield Plan in the coming months we will take into account any Government guidance that emerges in relation to the recent changes to the Use Class Order.

24. Will the Deloitte and Planit-ie Central Area Strategy be published within the consultation period to consider the capacity and approach for accelerating the delivery of sustainable residential growth across the City Centre? This would assist in assessment of the three options put forward. Will the CAS consider economic and other land uses?

Answer: *The Central Area Strategy (CAS) is being finalised but a Capacity Report has been completed which presents an initial amount of residential development for the Central Area. The Capacity Study can be downloaded [here](#). The CAS is primarily focused on the accelerated delivery of new homes, though evidence relating to economic and other land uses has been used and will be part of a series of next steps that are being considered by the CAS.*