



Historic England

YORKSHIRE

Mrs. Kath O'Donovan
Secretary to BBEST

Our ref: PL00484682

Your ref:

Telephone 01904 601 879

Mobile 0755 719 0988

9 November 2018

Dear Ms. O'Donovan,

**Broomhill, Broadfield, Endcliffe, Summerfield & Tapton Neighbourhood Plan
Pre-submission consultation Response**

Thank you for consulting Historic England in connection with the draft Neighbourhood Plan prepared for BBEST Neighbourhood Forum.

We welcome and support the draft Neighbourhood Plan and the accompanying Design Guide and particularly endorse the suite of policies set out in the Development, Design And Heritage Management section of the draft Neighbourhood Plan.

We would suggest that consideration be given to identifying the following within the Plan and its appendices and developing bespoke policies to afford appropriate levels of protection:

Non-designated Heritage Assets (NHAs): over and above local heritage assets already identified within Conservation Areas or the Sheffield City Council Local List. With regards NHA's, we would suggest that Historic England's Advice Note 7 (HEAN 1) [Local Heritage Listing](#) is cited.

Local Heritage Areas: historic areas outside or adjacent to existing Conservation Areas, which may be worthy of designation of new or amendment to the boundaries of existing Conservation Areas by Sheffield City Council, should BBEST choose to recommend this. With regards to the Local Heritage Areas (LHA's), we would suggest that Historic England's Advice Note 1 (HEAN 1) "[Conservation Area Designation, Appraisal and Management](#)" is cited, and each LHA should briefly highlight the elements of the area which warrant their identification as an LHA.



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Telephone 01904 60 1948 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.



Archaeological Sites: the Neighbourhood Plan area will contain archaeological, some of which may be designated as Scheduled Monuments. The South Yorkshire Historic Environment Record will hold records of such sites, and these should be acknowledged in the Neighbourhood Plan.

Heritage At Risk: the Neighbourhood Plan Area may have designated heritage assets which have been assessed as being “At Risk” on either the [Historic England Yorkshire Heritage At Risk Register](#) or Sheffield City Council’s Listed Buildings At Risk Register.

We hope this advice is of assistance, but if you require clarification, please do not hesitate to contact us.

Yours sincerely



Craig Broadwith
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As you will be aware the Neighbourhood Plan area lies within the current defined coalfield.

According to the Coal Authority Development High Risk Area Plans, there are recorded risks from past coal mining activity including 5 mine entries and likely historic unrecorded coal workings at shallow depth. If the Neighbourhood Plan allocates sites for future development in these areas then consideration will need to be given to how development proposals will take account of these risks to surface stability in accordance with the National Planning Policy Framework. In addition any allocations in the area of surface coal resource will need to consider the impacts of mineral sterilisation.

However, we note that at the current time the Neighbourhood Plan does not allocate any sites for future development and on this basis we have no specific comments to make.

In accordance with the Neighbourhood Planning (General) Regulations 2012 (as amended) please continue to consult The Coal Authority on planning matters using the specific email address of planningconsultation@coal.gov.uk.

The Coal Authority wishes the Neighbourhood Plan team every success with the preparation of the Neighbourhood Plan.

Yours sincerely

Melanie Lindsley

Melanie Lindsley *BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI*
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Our ref:
Your ref:

Kath O'Donovan
Secretary to BBEST

Elisa Atkinson
Highways England
Lateral
8 City Walk
Leeds
LS11 9AT

Date: 9th November 2018

Dear Kath

BBEST Neighbourhood Plan Draft for Consultation

Thank you for your consultation on the Draft Neighbourhood Plan and Design Guide 2018 covering Broomhill, Broomfield, Endcliffe, Summerfield and Tapton. We have reviewed this with the primary interest of the safe and efficient operation of the Strategic Road Network (SRN) in mind, and comments are set out below. Comments are only made on sections of relevance to Highways England pertaining to the SRN and therefore, where there is information supplied which is not in our remit, comments are not made upon these sections.

Sustainable and Balanced Community

We would be interested in the total number of dwellings associated with any increase or changes to housing in the plan area. The associated level of traffic generation and distribution from such dwellings and its potential for impact on the SRN will be our key priority.

Partnership Working

We welcome that consideration has been given to planning policy and should any buildings be converted to different uses such as for residential purposes, these will need a planning application which would be considered by us based on its own individual merit.

Maintaining Limits on Shared Housing

It is not in our remit to comment upon the limits of shared housing and rather we would re-iterate that we would be interested in the total number of dwellings associated with all new residential development. Once known, we will be in a position to consider whether these increase and impact on the SRN.

Increase Variety of Housing Available to Meet the Needs of Key Workers, First Time Buyers and Newly Forming Households

Once the mix of housing is determined we would seek to understand the total number of dwellings associated with the range of housing.

Maintain Sensible Density for Quality of Life

Once the level of additional housing has been determined, we will be able to consider the need for assessment of the impact on the SRN. Should any proposals for change of use buildings be forthcoming, these would need a planning application, which would be considered by us based upon its own individual merits.

Broomhill Centre

The objectives will support economic activity and growth which is in line with Highways England objectives. We welcome objectives which seek to encourage travel by active modes such as improving pedestrianised areas as this will contribute in reducing the number of those travelling by car. The enhancement of the local centre will attract local trips which would not impact on the SRN.

For us, identifying the varying nature and quantum of any sites for development in the centre will be key, especially if mitigation measures will be required on the SRN to accommodate the traffic generation from any new development proposals.

Active Travel

The objectives are welcomed as they will promote sustainable and active modes of travel. Likewise, the overall vision for active travel is welcomed. The NP acknowledges that all developments that generate significant amounts of movement should be supported by a Transport Statement (TS) or Transport Assessment (TA). We will assess these as applications come forward.

Improved Pedestrian and Cycle Routes

We support the promotion and use of sustainable transport choices.

Decreasing the Impact of Traffic

We support safe and convenient sustainable travel opportunities.

Restructure Car Parking

Policy **AT3 'Parking Management Area Wide'** will contribute to reducing the number of those travelling by car by removing unrestricted on-street parking but would seek to understand what parking provision will be for any new residential developments proposed within the plan area once sites are allocated for development. This is supported.

Development, Design and Heritage Management

We support the master planning of the area which will allow cumulative impact of development impact on the SRN to be assessed.

Community Actions

We note that one of the community actions is the 'Boulevard Project', which seeks to address the A57 as the 'spine' of the BBEST neighbourhood. As part of the objectives to deliver the project, those in our remit are:

- *To make the walk from Endcliffe to the University and points in between more pleasant, thereby encouraging more people to do it.*
- *To make cycling along the same route more pleasant, thereby encouraging more people to do it.*
- *To create conditions in which drivers of cars, vans, lorries and buses, and also cyclists, concede greater priority to pedestrians seeking to move along and to cross the street.*
- *To decrease the number and severity of Road Traffic Accidents (RTAs).*

We welcome these objectives and would re-iterate the points made previously, key for us will be the promotion of sustainable and active travel to reduce travelling by car. Furthermore, safety is a key concern for us and the objective to reduce the number and severity of RTA's is welcomed.

To achieve the Boulevard Project, BBEST re-iterate the importance of partnership working and a series of possible enhancements centred around a number and zones within the plan area. Any changes to the local road network are a matter for the local authority to comment upon but we would welcome ongoing discussions with SCC and BBEST to ascertain any individual or cumulative impact on the SRN.

BBEST propose to develop Broomhill Community Hub and should any development of the building be taken forward, we would welcome the planning application for comment.

I trust these comments are helpful; please do not hesitate to contact me should you wish to discuss any of the above.

Yours sincerely,

Elisa Atkinson
Asset Manager
Yorkshire & North East
Email: elisa.atkinson@highwaysengland.co.uk

Dear BBEST

Please see the response to your consultation below, on behalf of CycleSheffield.

Thanks,
Sam

--

CycleSheffield campaigns for cycling to be made safe and enjoyable for everyday journeys, for anyone. We are a voluntary organisation with 1200 supporters.

Summary

We welcome the focus on reducing impact of motor traffic on people using the area. The plan includes many good features to improve pedestrian priority. But proposals also show worrying use of shared space, and greater ambition is needed on removing motor traffic to allow for a safe cycle network which doesn't continue to exclude most people.

CycleSheffield response

We agree with the draft plan identifying motor traffic as the overriding negative factor in the area. This creates a disabling effect on people (especially children, older and less mobile), making them less willing or able to walk, and especially cycle, within and across the area. This has a serious effect on people's health and independence.

We welcome the intentions of the plan and especially the Boulevard project to reduce the priority and impact of this traffic and make an environment which improves the safety and convenience of walking and cycling. We particularly support the proposed elements:

- Replacing on-street parking around the retail centre with pedestrian and green space
- Creating continuous footway pavements across side streets
- Reducing speed limits to 20mph
- Narrowing carriageways
- Preventing HGV and delivery traffic during main pedestrian (and cycle) activity
- Recognising the principle of sustainable safety and the need for separation of pedestrian, cycle, and motor traffic on "Arterial Streets" (Brocco Bank/Clarkehouse Road; Glossop Road, Clarkson Street, Manchester Road, Fulwood Road, Whitham Road and Newbould Lane/Nile Street/Crookes Road)

We have concerns about:

- The Boulevard proposals with lack of adequate cycle infrastructure
- The suggestion that people using cycles taking "primary position in a traffic stream" as a design feature on main roads
- Use of 'shared space' in areas of heavy through-traffic



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However, we note that at the current time the Neighbourhood Plan does not allocate any sites for future development and on this basis we have no specific comments to make.

In accordance with the Neighbourhood Planning (General) Regulations 2012 (as amended) please continue to consult The Coal Authority on planning matters using the specific email address of planningconsultation@coal.gov.uk.

The Coal Authority wishes the Neighbourhood Plan team every success with the preparation of the Neighbourhood Plan.

Yours sincerely

Melanie Lindsley

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Development Team Leader

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Broomhill Community Library and Broomhill Community Trust

This is a hugely positive step forward for enabling communities to be fully involved in improving their neighbourhood.

Of specific concern is the establishment of a policy:

1 to maintain and enhance the green spaces and to seek provision of new areas however small e.g. small unused green space at Melbourne Avenue - could this be a community orchard? (seek thoughts of land owned by Sheffield High)

2 a clear pathway for increasing tree cover - at present large trees which are being cut down are not being replaced eg junction Newbould/Broomfield Roads.

3 improving the streetscape where the main shopping is located and in particular addressing air quality for which it is noted is poor and exceeds legal safety limits. Many children walk along the roads from the local schools.

4 Improve signage notably to significant buildings e.g. Broomhill Community Library. Promote heritage information via a board(s) in the main centre and other key locations.

This is a plan and Design Guide which is supported by all the trustees of BCL and BCT and we look forward to it going forward to the next stage.

Many congratulations.

- Electric vehicle charging infrastructure

Some detail on these points:

Lack of cycle network

The design ideas mentioned (adding sections of narrow uphill cycleway) would continue the absence of a network giving acceptable cycling conditions for anyone who is not already privileged to be brave, determined and able-bodied enough to cycle already.

Cycling could make a major contribution to shifting local traffic away from motorised modes (both passenger and commercial), and massively open up independent mobility across society (especially for children, older and disabled people), but a prerequisite for this is an environment which feels safe from motor traffic.

We don't think that trying to squeeze an uphill cycleway into either Glossop Road or Whitham Road will be enough. These current carriageways have sections between 8 metres and 7 metres wide. If two lanes of motor traffic are kept through here the remaining space for even a single-direction cycleway would be very narrow (no more than 1.5m in places). This is also in areas with uncomfortably narrow footways which should also be widened.

Although Sheffield City Council have still not published a cycle network strategic plan, there are some indications from the [City Centre Plan](#).

Plan xi: Strategic Cycle Routes

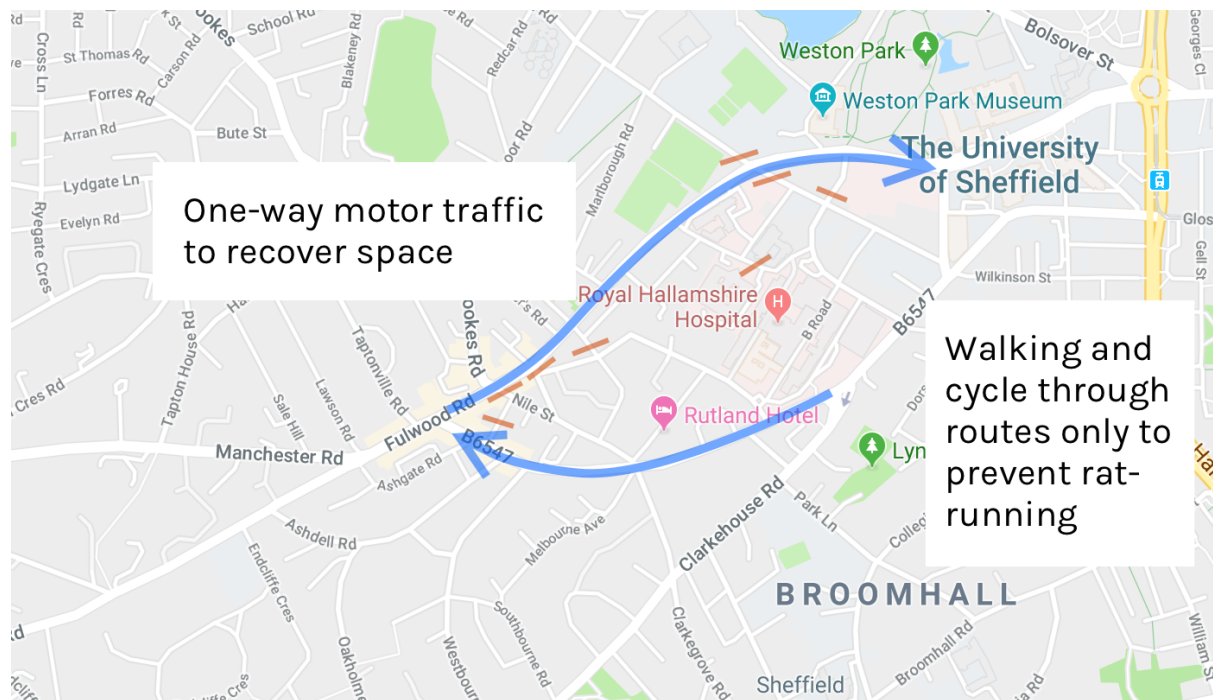


This shows “main cycle routes” on each of Whitham Road, Glossop Road, and Northumberland Road.

To make conditions on any of these routes suitable for general cycling beyond hardened enthusiasts there would need to be significant reallocation of space from motor traffic. This could be done in different ways, and while this isn't by any means a complete plan we'd encourage considering these options (shown below):

- Making Glossop Road and Whitham Road each one-way for motor traffic, freeing up half the carriageway space (with mode filtering between them to prevent rat-running)
- Closing Northumberland Road to all motor traffic (between Marlborough Road and Whitham Road)

This could improve the boulevard concept by reducing the motor traffic through most of the retail centre to a single lane, giving much more space for segregated cycleways, wider footways, and simpler junctions and crossings.



Primary position

Reducing speeds to 20mph throughout, and narrowing carriageways, would be welcome changes to slow traffic. But on busy roads like those in the plan area, these would make very little change to how vulnerable most people feel cycling. The draft plan refers to requiring people using cycles to take ‘primary position’. While it doesn't give a detailed layout plan, this seems to imply including on main roads.

This would be unacceptable as it excludes the majority of people from the benefits of using cycles – especially more vulnerable people.

Riding defensively is necessary as a form of survival, where the road design has ignored the safety and comfort of people using cycles. It should never be a deliberately planned outcome of a highway scheme. Below is a (photoshopped) image to illustrate what this design principle would mean (or more likely, who it would exclude).



Source: [The Alternative Dept of Transport](#)

Shared space

The shared space guidance note referred to has been withdrawn by the government. We hope that any revised guidance will make clearer that it is unsuitable for busy roads. It would be against the plan's stated principle of sustainable safety and the need for separation of both cycle and pedestrian traffic from motor traffic on busy roads.

We believe removing the formal distinctions and controls on motor traffic in an attempt to reduce its danger and dominance is focusing on the symptoms rather than the cause.

There [are situations where shared space can be successful](#) (minimal motor vehicles and no through traffic), though without removing heavy traffic it doesn't make for a comfortable place for walking or cycling, and can unfortunately even give more dominance to vehicles.

Electric vehicle charging

We suggest including a policy in the plan for the location of charging points for electric vehicles.

Without strong controls it is likely that roadside charging points will [get installed on pavements](#), further narrowing them and getting in the way of people walking. We recommend following the approach of the City of London, who aim to retain the public value of street space by keeping roadside charging to a minimum (preferring charging in car parks etc). If roadside charging equipment is installed it should be required to be in the carriageway, not the pavement.

We hope to see the plans for the BBEST area develop and put into practice the sustainable safety principles. If used effectively this should give people living in and around the area much greater freedom to move around safely, efficiently, healthily and sustainably. We are happy to discuss the points raised in this response and contribute further to the success of the BBEST plan.



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4 Improve signage notably to significant buildings e.g. Broomhill Community Library. Promote heritage information via a board(s) in the main centre and other key locations.

This is a plan and Design Guide which is supported by all the trustees of BCL and BCT and we look forward to it going forward to the next stage.

Many congratulations.

**REPRESENTATIONS TO THE
BBEST DRAFT NEIGHBOURHOOD PLAN
AND BBEST DESIGN GUIDE**

**Prepared by
DLP Planning Ltd
Sheffield**

November 2018

| | |
|--------------|--|
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| Approved by: | Michael Edgar BA (Hons) DipTP MRTPI Director |
| | |
| Date: | November 2018 |

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1.0 INTRODUCTION

- 1.1 These representations are made by DLP Planning (“DLP”) based on our experience of working on a variety of different applications for planning permission, Conservation Area Consent and Listed Buildings within the BBEST Neighbourhood Plan area.
- 1.2 At this stage in the preparation of the Neighbourhood Plan making process, we must **OBJECT** to the draft on a number of matters which relate to the policies and general soundness of the document. These matters are referred to in detail within this report against the relevant policy. We must **OBJECT** to the Draft BBEST Design Guide. There are serious concerns regarding the potential future use of both documents as a restrictive tool to positive investments and development aspirations in the area, including enhancement of the University of Sheffield’s Estate, the NHS facilities and student accommodation throughout the area.
- 1.3 We have previously made submissions to the City Policies and Sites (2013) Development Plan Document (DPD) and to the proposed Neighbourhood Area and Neighbourhood Planning Forum in 2014. At that stage we raised serious concerns that the growth objectives of the University of Sheffield, the NHS and private investors would be impeded by the inflexible approach to land uses and restrictive policies being put forward by BBEST. We are particularly keen to avoid such restrictions being applied through the Neighbourhood Plan in advance of the new Local Plan being progressed.
- 1.4 This submission also identifies significant concerns in respect of the general compliance of BBEST’s submissions with the Neighbourhood Planning (General) and Development Management Procedure (Amendment) Regulations 2016 the “Regulations”), the National Planning Policy Framework (the “Framework”) and the suite of national planning practice guidance (the “PPG”).
- 1.5 The Framework sets out guidance with regards to plan making and states at paragraph 16 that plans should:
- a) be prepared with the objective of contributing to the achievement of sustainable development;*
 - b) be prepared positively, in a way that is aspirational but deliverable;*
 - c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers*

and operators and statutory consultees;

d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

e) be accessible through the use of digital tools to assist public involvement and policy presentation; and

f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

- 1.6 It is considered that the draft Neighbourhood Plan has not been positively prepared in a way that is aspirational, or deliverable. The Plan seeks to restrict development through the designation of green corridors and areas of ecological value, which is not consistent with the current development plan, or with the aspirations of the new Sheffield Local Plan. There have been no allocations made for any types of development.
- 1.7 Many of the policies are unclear and ambiguous and, in parts, either contradict or in conflict with one another in their current wording. This cannot be clear to a decision maker as to how they should apply the policies to development proposals.
- 1.8 Equally, many of the policies are unnecessary duplications of policies within UDP and Core Strategy. Article 4 Directions are also in place within the area to control certain forms of development, including change of use from C3 to C4 and permitted development rights within the Broomhill Conservation Area. It is not necessary to replicate these provisions within the Neighbourhood Plan. It is also clear that the Plan, as drafted, has not taken account of the up-to-date Framework as it refers to the 2012 edition.
- 1.9 In summary, the BBEST Neighbourhood Plan and Design Guide fail to meet the requisite legislative and policy criteria and should not be accepted by the Council in their current form.

2.0 OBJECTIONS ON THE DRAFT NEIGHBOURHOOD PLAN: GENERAL

2.1 We **OBJECT** to the draft BBEST Neighbourhood Plan on the basis that it does not meet the general necessary requirements of neighbourhood plan in accordance with the relevant legislation.

2.2 Guidance on the basic conditions of a neighbourhood plan are set out within paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 as applied to Neighbourhood Plans by section 38A of the Planning and Compulsory Purchase Act 2004.

2.3 Further guidance is set out within the National Planning Practice Guidance (the "Guidance") (Paragraph: 065 Reference ID: 41-065-20140306). Only a draft Neighbourhood Plan or Order that meets each of the basic conditions can be put to a referendum and be made. The basic conditions are as follows:

- a) *having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or Neighbourhood plan).*
- b) *having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders.*
- c) *having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders.*
- d) *the making of the order (or Neighbourhood plan) contributes to the achievement of sustainable development.*
- e) *the making of the order (or Neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).*
- f) *the making of the order (or Neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.*
- g) *prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or Neighbourhood plan).*

2.4 The Guidance also states that:

The resulting draft neighbourhood plan must meet the basic conditions if it is to proceed. National planning policy states that it should support the strategic development needs set out in the Local Plan, plan positively to support local development and should not promote less development than set out in the Local Plan or undermine its strategic policies (see paragraph 16 and paragraph 184 of the National Planning Policy Framework). Nor should it be used to constrain the delivery

of a strategic site allocated for development in the Local Plan.

Should there be a conflict between a policy in a neighbourhood plan and a policy in a Local Plan, section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan.

(Paragraph: 044 Reference ID: 41-044-20160519)

- 2.5 The draft Plan refers to the now superseded version of the National Planning Policy Framework (2012) throughout. Whilst regard has been paid to national policy, the BBEST Neighbourhood Plan was published for consultation some considerable time after the adoption of the National Planning Policy Framework, July 2018.
- 2.6 Therefore at this stage, the draft plan does not meet basic condition a) in that it does not have regard to the most up-to-date national policies. The document needs to be fully redrafted before it is submitted to the Council and considered for independent examination.
- 2.7 In terms of criteria e), the development plan for Sheffield is out-of-date and a new Local Plan is being prepared. Until the new Local Plan is published in draft, providing a steer of the strategic policies, it is unknown whether this condition has been met by the BBEST Neighbourhood Plan.

3.0 OBJECTIONS ON THE DRAFT NEIGHBOURHOOD PLAN: POLICIES

3.1 We **OBJECT** to a number of specific policies within the draft BBEST Neighbourhood Plan as set out within this chapter. It is not in general conformity with the strategic policies within the Development Plan and does not have regard to national policies. It does not serve a clear purpose and duplicates many of the current policies applicable to development within conservation areas.

3.2 The Guidance provides advice on how policies in a neighbourhood plan should be drafted. It states that:

‘A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.’

(Paragraph: 041 Reference ID: 41-041-20140306)

3.3 Objections are made to the following policies:

Environment and Green Spaces

EN1 – Protecting Biodiversity

EN2 – Ecological Networks

EN4 – Trees and Tree Cover

Sustainable and Balanced Community

SBC1 – Supporting Housing Diversity and Quality

SBC6 – Homes Built for Life

Broomhill Centre

BC3 – Improving the Public Realm – Map 7

Active Travel

AT1 – Access and Movement

AT4 – Air Quality

AT5 – Transport Assessment and Travel Plans

Development, Design and Heritage Management

DDHM1 – Key Design Principles

DDHM6 – Development within the Hospitals, South East and South West

4.0 ENVIRONMENT AND GREEN SPACES

Vision and Objectives

- 4.1 Objective E refers to ‘*enhance the quality of urban gardens*’. It is unclear as to whether this refers to public or private garden spaces. This should be specified as ‘public urban gardens’. The control of the quality of private garden spaces is unreasonable and goes beyond the remit of the purpose of this Plan and planning legislation generally and is indicative of an overly draconian approach to works around private dwellings.

A. PROTECTING URBAN WILDLIFE, THEIR HABITATS AND ECOLOGICAL NETWORKS

- 4.2 Reference is made to a number of ecological networks. The second of these key networks comprises Crookes Valley Park, the area surrounding the University’s Arthur Willis Centre, the ‘Harcourt Hole’ and the edges of the University sports pitches. The Plan indicates that it is intended to protect and enhance existing levels of biodiversity within the Plan Area and will ensure that the major ecological networks which have been identified, are retained and that this green infrastructure is extended wherever possible.

EN1: Protecting Biodiversity

Development affecting identified privately owned areas of land and key garden blocks within the Plan Area should ensure that appropriate conservation and Mitigation measures are provided so as to ensure no net loss for biodiversity.

EN2: Ecological Networks

The identified ecological networks which include key stepping stones (providing ecological connectivity and green infrastructure); that allow for wildlife movement and encourage and support foraging; that connect sites of importance; and contribute to the Plan area’s biodiversity, will be protected. Development will not be allowed to cause a break in the three identified ecological networks identified on Map 2.

- 4.3 There has been no consideration given to the current Sheffield Unitary Development Plan (UDP) policy designations of these areas identified as ‘key green corridors’. For example, the ‘Harcourt Hole’ referred to is designated as an Education Area.
- 4.4 The Draft City Policies and Sites DPD (2013) represents the last consultation document which set out the Council’s aspirations in terms of strategic policy and site allocations on a define proposals map. Given its draft status, very limited weight can be given to the 2013 draft, however, consideration should be given to it to understand the future intentions for the Council and also landowners and developers that have promoted these sites in the

past. The Harcourt Hole for example, was identified within the Draft City Policies DPD 2013 as a potential housing allocation ref: P00235. The University owned Arthur Willis Centre and the Northumberland Road car park were identified as lying within a Housing Area, their current designation being Open Space within the UDP.

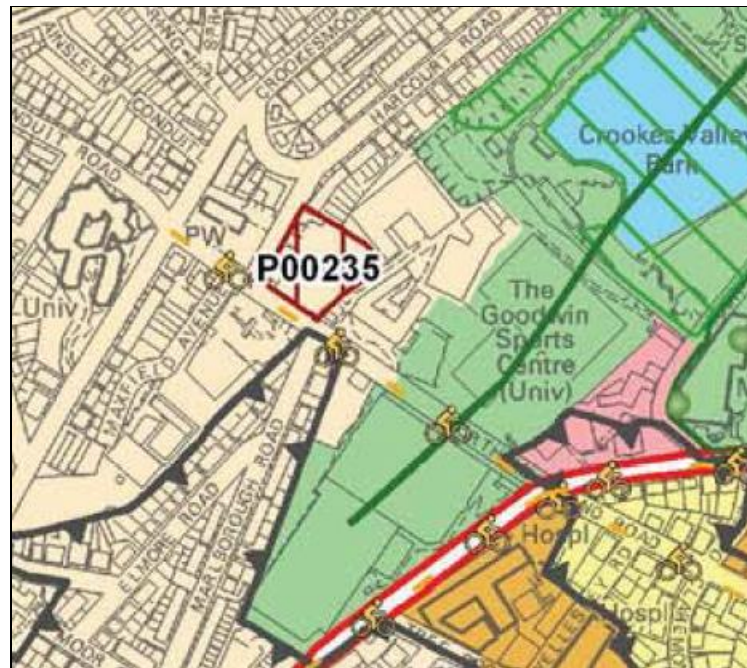


Figure 1. Draft City Policies and Sites DPD (2013) Proposals Map Extract

- 4.5 Notably the Harcourt Hole site is a cleared development site and a visual inspection demonstrates the site contains little in the way of ecological value other than the trees to the site boundaries.



Photograph 1: Land at Harcourt Road taken from Northumberland Road towards the south



Photograph 2: Land at Harcourt Road taken from Northumberland Road towards the east



Photograph 3: Land at Harcourt Road taken from Northumberland Road towards the east

- 4.6 Unless a site is identified to contain Special Scientific Interest, or genuinely perform as a local nature site, there appears no sound or substantive evidence base on which to identify the ecological value of a site within the Neighbourhood Plan.
- 4.7 Ecological value can change over time and where a site has the potential for ecological value and wildlife, this value is considered as part of the planning process for its redevelopment. At that time, the site is assessed and the necessary mitigation measures are determined to compensate for any loss. Protecting such sites as the 'Harcourt Hole' within the Neighbourhood Plan has clearly not taken into account the need for additional housing within the area and the city as a whole, and will simply unnecessarily stall the

redevelopment of such site. This clearly demonstrates that the Plan has not been positively prepared.

- 4.8 Until the adoption of the new Local Plan, the policy designations within the UDP represent the adopted policy position for the sites referred to. Placing protection on these sites such as that in Policy EN1 and EN2 within the Neighbourhood Plan in advance of the adoption of the Local Plan has the potential to stagnate these sites.

C. MAINTAIN AND ENHANCE TREES

EN4: Trees and Tree Cover

- 4.9 Policy E4 refers to trees along public highways, within public open spaces and within private open spaces where they are clearly visible from public viewpoints (identified on Map 4 as 'high quality individual trees') being protected. This policy should at least be amended to include the wording 'unless their loss is justified'. For example, replacement tree planting could be proposed as part of the redevelopment of a site which would ensure dead or dying or unsuitable trees are replaced. If these trees are of high enough quality to be protected in such a way, they should be protected by a Tree Preservation Order, the Neighbourhood Plan should not be used as a form of lesser protection which is intended to restrict development proposals. Again this places unnecessary constraints on a site.
- 4.10 Point 5, requiring sufficient information to enable the impact of the development on the tree(s) to be properly assessed is not necessary as this is covered by the validation requirements for planning applications and varies from site to site.
- 4.11 Overall, this policy is unclear particularly with regards to points 3 and 4 and needs to be re-written and restructured so it is evident how a decision maker should react to development proposals as required by paragraph 16 of the Framework.

5.0 SUSTAINABLE AND BALANCED COMMUNITY

A. MAINTAINING LIMITS ON SHARED HOUSING

SBC1: Supporting Housing Diversity and Quality

The development of HMOs including those created by conversion and/or change of use will not be supported within the designated Plan Area. All new residential development for the private rented sector including that created by conversion and/or change of use will be strongly encouraged to sign up to SNUG (see reference in introductory context section).

E. INCREASE LONGEVITY OF OCCUPATION

SBC6: Homes Built for life

Any residential development by way of conversion from a single dwelling or commercial unit to flats/maisonettes/apartments/duplex should solely provide accommodation of three bedrooms or more.

- 5.1 SBC1 seeks to control the development of HMOs including those created by conversion and/or change of use, which it states will not be supported. The change of use of properties from C3 dwellings to C4 is already controlled by the Article 4 Direction that came into force on 10th December 2011. Within the Article 4 area, which includes the whole of the BBEST Neighbourhood Area, it is necessary to apply for planning permission to convert a dwellinghouse (Use class C3) into an HMO for 3 to 6 unrelated people (Use class C4). Applications would then be assessed against the policies contained within the development plan, which at the present time is Policy CS41 Creating Mixed Communities. Criteria d of that policy requires:

'd. limiting new or conversions to hostels, purpose-built student accommodation and Houses in Multiple Occupation where the community is already imbalanced by a concentration of such uses or where the development would create imbalance.'

- 5.2 The key word within CS41 is 'limiting' new or conversions to HMOs where the community is already imbalanced. This allows for an assessment of the balance to be made at the time of the application. SBC1 provides a blanket objection to all new HMOs without allowing for any detailed assessment of the area at that current time. This is unreasonable and cannot be considered sound.
- 5.3 The second point of SB6 is in conflict with SBC1. SBC6 requires that any residential conversion from a single dwelling or commercial unit to form flats/maisonettes/apartments/duplex should provide accommodation of 3 bedrooms or more. Given the restrictions in SBC1 this suggests that any conversions are purely for

family housing however, this is not explicit and if this is the intension of this policy it needs fundamentally redressed. This demonstrates that the Plan is internally inconsistent and policies are contradictory to each other. This cannot be clear to a decision maker as to how this would relate to development proposals and is again not in accordance with the Framework.

- 5.4 There is clearly duplication of legislative advice under SBC6 which refers to meeting Part M4(2) of Building Regulations. This is a superfluous reference to other matters covered in legislation outside of planning.

6.0 BROOMHILL CENTRE

BC3 Improving the Public Realm – Map 7

As developments come forward within the Broomhill Centre opportunities to restructure the existing parking arrangements within the public realm area identified on Map 7 a will be explored with a view to providing a shared space, which would be available for one off events such as markets or music events.

- 6.1 Map 7 illustrates the areas that will be explored with a view to providing a shared space. This includes an area along the frontage of the retail units at Fulwood Road and a point at the junction with Newbould Lane and Whitham Road. There appears to be an anomaly on this plan showing a route through the Hallamshire Hospital across Beech Hill Road. A key should also be added to this plan.
- 6.2 It is understood that the ‘retail centre public realm’ works would require the removal of the car parking to the frontage of the retail units in this area. This is understood to be Council owned land. There is no mechanism for how these public realm improvements will be delivered other than reference to when developments come forward within the Broomhill Centre. There is also no definition or threshold for the developments it refers to. Further clarity and certainty is required for this policy to be found sound in accordance with the Framework and legislation. It appears wholly counterproductive at a time when retail centres are struggling for shopping facility investment, to burden new proposals with additional costs.

DDHM1 Key Design Principles

- 6.3 The design principles contained within DDHM1 are overly prescriptive and create unnecessary additional control on properties over and above the conditions for development in conservation areas. As stated, there are areas within the Neighbourhood Plan area that do not fall within a Conservation Area, yet are sought within the Plan to be subject to the same restrictions.

Hospitals, South East and South West Character Areas

DDHM6 Development within the Hospitals, South East and South West

Development will be expected to preserve the existing balance of uses within these areas within; and the historic character of the areas and should comply with the objectives of Policy DDHM1. In addition:

a. Development will be expected to respond to the scale, grain, layout, setting and appearance of the historic villas;

- b. Development that seeks to amalgamate buildings will be expected to ensure that the individual buildings can still be understood in their own right;*
- c. Extensions to buildings of townscape merit should be set back and recessed from the main façade;*
- d. The loss of stone sett thresholds to properties will be resisted and stone sett thresholds will be reintroduced, wherever possible;*
- e. The introduction of wayfinding will be encouraged to help improve the legibility of the hospital complexes;*

- 6.4 Elements which are stated as affecting the townscape quality and character of the area include the large number of historic properties given over to institutional rather than residential uses, as well as the amount and scale of institutional buildings. No further evidence is provided as to the harm that is caused by such buildings being in active use by the University or Hospital.
- 6.5 There are five major hospitals within this part of the city and the support functions provided are required to operate in close proximity to the hospital facilities. The alternative to not re-using vacant former residential properties would be to operate away from the hospital site or provide new build facilities, both of which would have implications for the area or the operation of the hospital. Whilst the historic buildings are no longer in use as they were originally intended, their continued active use protects the fabric of the buildings for the foreseeable future as well as providing an important social function in health care and education provision.

7.0 ACTIVE TRAVEL

A. IMPROVED PEDESTRIAN & CYCLE ROUTES

AT1: Access and Movement

- 7.1 AT1 refers to development which has an adverse impact on existing levels of safety, accessibility and ease of movement along the identified access and movement corridors being resisted. There is no opportunity given for mitigation measures to be explored which could overcome those harmful impacts. Such a restrictive approach cannot be justified. As with Policy EN1 and EN2, this policy demonstrates how the Plan has not been positively prepared.

AT4: Air Quality

- 7.2 AT4 requires all new major development to be supported by a full Air Quality Assessment. This is addressed by the Council's planning application validation requirements and as such does not need to be replicated within the Neighbourhood Plan.
- 7.3 The policy continues to state that development which is found on examination to have demonstrably negative impact on air quality within the worst air quality areas along the Broomhill Corridor will not be supported. Again, as with AT1 there is no opportunity to address any impact resulting from a development through appropriate mitigation measures.

AT5: Transport Assessment and Travel Plans

- 7.4 This policy is unnecessary as it is addressed by the Council's planning application validation requirements.

8.0 DEVELOPMENT, DESIGN AND HERITAGE MANAGEMENT

Views and Vistas

- 8.1 It is identified that the BBEST character assessment has identified various views and vistas, as contained within the Design Guide, in addition to those already identified within the Broomhill Conservation Area Appraisal. The additional views are identified in the BBEST Design Guide and cover sight lines of specific buildings and longer views across the city. This is referred to within Key Principle 6 Important and Character Views (Design Guide page 18).
- 8.2 One of the views referred to is that crossing from the top of Northumberland Road/Harcourt Road towards the Goodwin Sports Centre and Weston Park. This is outside of the 3 designated Conservation Areas. This view would obviously be restricted, should the site at 'Harcourt Hole' be developed. Given the planning history of the site and allocation proposed, this is not an unreasonable expectation to make. This view allows long distance views of the Arts Tower given the topography of the area, but is not unique. The view point could be taken from the public open space to the north western corner of Crookes Valley Park which would allow a greater unrestricted view of the Arts Tower and its setting and the City beyond.

9.0 DESIGN GUIDE

9.1 As currently drafted, we must **OBJECT** to the Draft Design Guide.

9.2 Guidance is provided within the Framework with regards to the preparation of Design Guides and states at paragraph 126 that:

To provide maximum clarity about design expectations at an early stage, plans or supplementary planning documents should use visual tools such as design guides and codes. These provide a framework for creating distinctive places, with a consistent and high quality standard of design. However their level of detail and degree of prescription should be tailored to the circumstances in each place, and should allow a suitable degree of variety where this would be justified.

9.3 The level of detail within the Design Guide has, to an extent, been steered by the Conservation Area Appraisals and policy guidance relating to development within Conservation Areas. However, the guide goes further on a number of details which are considered to be far too prescriptive and beyond the requirements and expectations for development within Conservation Areas let alone these areas of land not falling within such a designation. These include:

- *Any loss of gardens to hard standing is to be resisted* (p17) – it is assumed this is referring to front garden areas, but is unclear.
- *Key Principle 6 – Important and Character Views* (p18) – the additional views to be protected outside of the conservation areas are not justified and have not been assessed.
- *Key Principle 7 – Architectural Details – Windows* (p20) and *Respect pattern and variety of rooflines* (p21) - presents additional restrictions on properties outside of the Conservation Areas

Character Areas: Hospitals

9.4 Reference is made to the vast majority of the older historical villas that are now in use either by the Hospital or the University of Sheffield. It is claimed that this has altered the feel of the area after 5pm and at weekends, where there is little activity and the area feels quite empty (p40).

9.5 The buildings around the hospital that have been converted in the past have resulted in the

continued use of these buildings many of which are listed or of special interest. Activity around the hospital reduces outside of office hours, however, there remains considerable activity around the hospital site and this area is a through route connecting Broomhill to the University central campus as well as connecting the area around Northumberland Road to Glossop Road.

- 9.6 The vision for this, and the other Character Areas, is overly prescriptive and the protection and enhancement of this area is addressed by the current design policies within the development plan.
- 9.7 Design policies are adequately set out within the UDP and Core Strategy. Special character can be preserved and enhanced through the relevant Built Environment Policies relating to Conservation Areas and Listed Buildings within the BBEST Neighbourhood Plan area.
- 9.8 The Design Guide applies to the whole of the Neighbourhood Area which includes areas that lie outside of the three Conservation Areas. This includes the area around the Royal Hallamshire Hospital. These areas are excluded from the designated conservations areas and whilst there are features which are characteristic of the history of the area, they have not been considered to be of a value significant enough to warrant conservation area protection. Therefore, it is considered that the application of the Design Guide in these areas in particular, is far too prescriptive, adding unnecessary protection that goes beyond the remit of the Neighbourhood Plan and does not comply with current policy and legislation.

10.0 COMMUNITY ACTIONS

Boulevard Project

- 10.1 Possible enhancements are referred to for the proposed Boulevard Project area. While this may be an opportunity to improve the quality of the environment around this area, objectives such as limiting HGV access to hours of low pedestrian activity seems extremely difficult to deliver through planning mechanism. Given the A57 is an important arterial route providing access to and from the city centre from the west of Sheffield and then to Manchester and the Peak District, this restriction appears wholly unrealistic.

Banning To Let Signs

- 10.2 Suggestion is made to ban to let signs within the Neighbourhood Plan area. The draft Plan recognises that the Plan cannot directly ensure this and assumptions such as crime would probably be reduced are unfounded. It is considered that the Neighbourhood Plan is not the appropriate mechanism to address this matter and reference should be removed.

11.0 CONCLUSION

- 11.1 These representations have been submitted in response to the Draft Neighbourhood Plan and the Draft BBEST Design Guide consultation process. We have set out our **OBJECTIONS** to the draft documents.
- 11.2 Both documents fail to meet the tests within the Framework with regards to plan making, in that they are not positively prepared. These are unclear and ambiguous policies and wording, and are largely a duplication of policies that apply to the Conservation Areas which are covered under the current UDP policies. The blanket use of restrictive policies provides a further level of control over areas which have not been considered to warrant inclusion within the three identified conservation areas. The Neighbourhood Plan does not make reference to up-to-date national planning policy (The Framework 2018) and makes no positive allocations for development. While there is no up-to-date Development Plan for the Neighbourhood Plan to accord with, draft documents and the direction of travel of site allocation and growth aspirations have not been taken into account.
- 11.3 There are serious concerns regarding the potential future use of both documents as a restrictive tool to the development aspirations in the area, including enhancement of the area.
- 11.4 As a result, the BBEST Neighbourhood Plan and Design Guide fail to meet the requisite legislative and policy criteria and should not be accepted by the Council in its current form.

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RICSTM

Sheffield City Council formal response on the draft BBEST Neighbourhood Plan

9 November 2018

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PART 1: Executive Summary (planning and non-planning response)

Sheffield City Council are providing to BBEST Neighbourhood Forum a detailed response to their Pre-Submission Consultation on the BBEST Neighbourhood Plan and accompanying maps. This includes:

- The Sheffield Planning Service's response as part of its Duty to Advise and Assist Neighbourhood Forums with preparing Neighbourhood Plans.
- The rest of the Council's response.

The Sheffield Planning Service is also providing BBEST guidance on what to be aware of and to expect in relation to the Neighbourhood Plan Examination.

We have included below an Executive Summary of all the responses from the Council.

Sheffield Planning Service's Duty to Advise and Assist

This response continues the advice and assistance of Sheffield Planning Authority. This relates to the parts of the Plan (Chapters 1-5) which would form part of the Sheffield development plan, and would be subject to Examination and Referendum, and inform planning decisions. Comments on Chapter 6 are also given.

The Council would also recommend that BBEST Neighbourhood Forum consider obtaining their own legal advice on the Plan. Neighbourhood Planning is a relatively new area where the law and policy is developing rapidly and where legal challenges are commonplace. Whilst we will do our best to mitigate the risk of challenge as part of our ongoing compliance with the duty to assist, there is no guarantee that Sheffield City Council's interpretations of the law will be supported by a High Court judge. In this context, there is considerable benefit in BBEST Neighbourhood Forum obtaining its own legal advice to further reduce the prospect of legal challenge.

The Neighbourhood Plan has improved substantially from earlier drafts. However, in our view the current Plan still requires some work to meet the requirements set down in Regulations and Guidance. Therefore, the Council see the benefit of a further meeting to work with BBEST Neighbourhood Forum to address what it sees as the main 'risk' areas with regard to the draft Plan, particularly:

- The Environment and Green Spaces chapter and policies within
- The Sustainable and Balanced Community chapter and policies within
- The Active Travel chapter and policies within
- Development management issues regarding implementation of policies

We are raising concerns about some of the draft policies not being locally distinctive enough, lacking clarification and requiring both justification and evidence. We specifically raise concerns with the following policies:

- EN1 Protecting Biodiversity in relation to meeting the basic condition of contributing towards sustainable development;

- SBC2 Housing to meet local needs as we consider that there is not enough detail, evidence and it is ambiguous;
- SBC3 Housing density in relation to meeting the basic condition of being in general conformity with strategic policies in the development plan;
- BC1 Broomhill centre and BC2 Shop front design as they lack local distinctiveness over and above national and local policies;
- AT4 Air Quality due to citywide strategic work on-going by the Council.

The Plan is not the place to provide all the supporting documentation and evidence for the Plan. Therefore these comments do not give a judgement of whether the legal requirements are met if other documentation was or was not forthcoming. The Basic Conditions Statement is likely to be the main way that a qualifying body can seek to demonstrate to the independent examiner that its draft neighbourhood plan meets the basic conditions, and the national planning guidance. Where it is not obvious from the detail of the Plan that there will be additional accompanying evidence in a separate supporting document, the need for more has been raised specifically within this whole response.

Comments from the rest of the Council

The Parks & Countryside Service have provided comments and advice relating to ecology, allotments, woodlands and green spaces in general. In particular suggestions are made to help enhance the BBEST NP to help meet localised needs, and further information is provided to assist your evidence base on Trees.

Property Services have raised landowner objections to the policies which are restrictive of development, in relation to some of the Council owned sites that fall within the BBEST NP area.

The Housing Service have stated that they support the principle of limiting shared housing and improving the diversity and quality of homes in the area. In terms of local housing needs, details are provided on what the Neighbourhood Plan should reflect with regards to housing types and sizes which are in most short supply for the community.



Cllr Jack Scott, Cabinet Member for Planning & Transport

PART 2: Sheffield City Council's formal planning response

Introduction

For information. It is useful to give BBEST Neighbourhood Forum some general context for Sheffield Planning Authority's response, and to think ahead to the statutory process that the BBEST Neighbourhood Plan (NP) would travel through, leading to a successful adoption.

Role of Sheffield Planning Authority

Sheffield Planning Authority has a role in assisting and advising BBEST Neighbourhood Forum, to help them produce a Plan with a content which will result, post Examination, in a successful referendum, and be used in planning decisions. There are only a few cases where Examiners don't recommend any modifications to neighbourhood plans before they go to referendum; there are cases when neighbourhood plans cannot be amended sufficiently to meet the Basic Conditions and legal tests, because the material in the Plan or supporting documents are found wanting. Sheffield Planning Authority is supporting BBEST Neighbourhood Forum, as much as they can, to ensure the latter case does not occur.

Local planning authorities make the final assessment in relation to the Basic Conditions and legal tests, and determine, after the Examiner's recommendations, what amended Plan content is put forward to referendum. Any substantial changes to the Plan would need publicising on the local planning authority's website, seeking comments, prior to recommending change.

Previous Advice and Assistance

Sheffield Planning Authority has supported BBEST Neighbourhood Forum by providing ad-hoc verbal and email advice, written advice on earlier drafts of the Plan, chapter specific workshops or meetings, and providing evidence to support the development of certain policies.

Written advice on an early version of draft policies was provided in 2016 and on a later version in 2017. The Plan has improved substantially from earlier drafts, however, in our view the current Plan still requires some work to meet the requirements set down in Regulations and Guidance.

One issue that we would flag up at this stage is the need to subject the Plan to an Equality Impact Assessment (EqIA). When formally deciding to 'make' the Plan following the referendum, the Council will need to have due regard to its Public Sector Equality Duty (PSED) and the need to eliminate discrimination, advance equality of opportunity and foster good relations between different people when carrying out their activities. In order to address this duty we would appreciate sight of any consultation strategy to ensure that this is consistent with the PSED. We would also like to consider, from an equality perspective, further changes that will be made to the Housing Chapter before Submission.

We have facilitated issue specific workshops or met to provide advice on each of BBEST's main themes (Plan chapters).

In addition, the Council see the benefit of a further meeting to work with BBEST Neighbourhood Forum to address what it sees as the main 'risk' areas with regard to the draft Plan, particularly:

- The Environment and Green Spaces chapter and policies within
- The Sustainable and Balanced Community chapter and policies within
- The Active Travel chapter and policies within
- Development Management issues regarding implementation of policies

The Council would also recommend that BBEST Neighbourhood Forum consider obtaining their own legal advice on the Plan. Neighbourhood Planning is a relatively new area where the law and policy is developing rapidly and where legal challenges are commonplace. Whilst we will do our best to mitigate the risk of challenge as part of our ongoing compliance with the duty to assist, there is no guarantee that Sheffield City Council's interpretations of the law will be supported by a High Court judge. In this context, there is considerable benefit in BBEST Neighbourhood Forum obtaining its own legal advice to further reduce the prospect of legal challenge.

This response in relation to Plan content

This response continues the advice and assistance of Sheffield Planning Authority. This relates to the parts of the Plan (Chapters 1-5) which would form part of the Sheffield development plan, and would be subject to Examination and Referendum, and inform planning decisions. Comments on Chapter 6 are also given.

It is noted that this draft NP has been written to align with the 2012 National Planning Policy Framework (NPPF), as you have indicated to us you want to submit before the 24 January 2018. The new NPPF (as amended July 2018) states in Annex 1 that 'the policies in the previous framework will apply for the purpose of examining plans, where those are submitted on or before 24 January 2019'. However, it is important to note that footnote 1 in the introduction clearly states that the revised NPPF replaces the previous version; and as such would be the framework that would be used to determine any planning applications. In the light of this, we consider it would be helpful to provide comments on this draft NP based on the revised NPPF too, to enable you to futureproof your proposed NP policies. It would be unfortunate for you to have a plan which is adopted but very quickly becomes out of date. The new NPPF (as amended 2018) sets out the planning framework for the hierarchy of planning policies. This includes Neighbourhood Plan policies. Where there is statement of relevance to *any plan*, this is relevant to Neighbourhood Plans alongside Local Plans. It is therefore suggested you review the NPPF to identify the relevant paragraphs that apply to your Neighbourhood Plan.

Key statements of the NPPF (2012 and amended 2018) that we would like to particularly highlight in relation to our comments are as follows:

Para 6 of the NPPF (2012) (equivalent is Para 7 as amended 2018) states that ‘the purpose of the planning system is to contribute to the achievement of sustainable development’. Para 184 of the NPPF (2012) (equivalent is Para 29 as amended 2018) states that Neighbourhood Plans ‘should not promote less development than set out in the Local Plan or undermine its strategic policies’. NPPF paras 16, 17 and 154 (2012) (equivalent are paras 15 and 16 (a) to (f) as amended 2018) specifically outline the scope and requirements of plans. Advice is presented later where we consider that the proposed draft policies fail to meet this requirement.

Para 28 of the NPPF (as amended 2018) states that non-strategic policies ‘can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies’. We acknowledge that the BBEST NP meets most of these requirements with the exception of allocating sites for development.

Para 041 of the National Planning Practice Guidance (NPPG) builds on the NPPF by stating: ‘A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.’ Advice is presented later where we consider that the proposed draft policies fail to meet this requirement.

Paras 8 and 9 of the NPPF (2012) (equivalent is para 9 as amended 2018) states that ‘the planning system should play an active role in guiding development towards sustainable solutions’, and need to ‘take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas’. This is developed further with more detail in the new NPPF (as amended 2018) in Para 16 part (f) stating that plans should ‘serve a clear purpose, avoiding unnecessary duplication of policies’ and part (b) be prepared positively, in a way that is aspirational but deliverable. Advice is also presented on this where we consider the proposed draft policies fail to meet these requirements, particularly in relation to avoiding duplication and adding value locally.

Para 37 of the NPPF (as amended 2018) states that ‘Neighbourhood Plans must meet certain ‘basic conditions’ and other legal requirements¹ before they come into force. These are tested through an independent examination before the Neighbourhood Plan may proceed to referendum. The Sheffield planning authority responses submitted are not going to focus on where there is minimal or no concern that the Plan content meets the Basic Conditions. These comments may highlight conflicts, but the Basic Conditions only require general conformity with strategic policies contained the development plan.

¹ As set out in Paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended)

The Plan is not the place to provide all the supporting documentation and evidence for the Plan. Therefore these comments do not give a judgement of whether the legal requirements are met if other documentation was or was not forthcoming. The Basic Conditions Statement is likely to be the main way that a qualifying body can seek to demonstrate to the independent examiner that its draft neighbourhood plan meets the basic conditions, and the national planning guidance. Where it is not obvious from the detail of the Plan that there will be additional accompanying evidence in a separate supporting document, the need for more has been raised specifically within this whole response.

Additional Advice

Accompanying this response to the Plan content, Sheffield planning service are pointing BBEST Neighbourhood Forum to guidance produced by others, which sets out tips on how communities can prepare their plans for Examination, and what to expect from the Examination process.

Please note that due some of the draft NP policies being new or substantially different to previous versions that we have commented on, specific comments are made on various policies seeking further work, clarification and/ or evidence. It is strongly recommended that BBEST Neighbourhood Forum address the issues raised prior to formal submission; as outlined earlier we are suggesting meetings to discuss particular areas in more detail. There is no opportunity to change or submit additional evidence after Formal Submission.

Maps and Plan Period

There needs to be a clear distinction between which maps are an integral part of the Plan and which are supporting evidence. We are able to digitise the policy designations included in different BBEST maps and use these to produce a single BBEST Policies Map for you to include in your submission and cross refer to in Plan policies. Please notify us if you would like us to undertake this work for you.

The plan must specify the period to which it has effect in order to meet one of the Basic Conditions. This is often done on the front cover.

Introduction section up to and including Membership, events & attendance

It is useful for the NP to set the context of the BBEST Neighbourhood Forum and the work it has undertaken. It is suggested that a cross-reference is made to your consultation report. The latter will be required to meet the basic conditions (NPPF para 37 (as amended 2018) applies), and it would be helpful for people reading the NP to be signposted to this for a detailed account of how you have engaged with others, planned and undertaken your consultation, and how it has influenced your plan making process including decision making.

EN: Environment and Green Spaces

Objectives

- A. Protect urban wildlife, their habitats and ecological networks*
- B. Enhance access to and use of public space*
- C. Maintain and enhance trees*
- D. Enhance the quality of urban gardens*
- E. Maintain and improve blue infrastructure*

EN1 – PROTECTING BIODIVERSITY

Development affecting identified privately owned areas of land and key garden blocks within the Plan Area should ensure that appropriate conservation and mitigation measures are provided so as to ensure no net loss for biodiversity. [map 1 refers]

In order to make the policy add value locally we suggest you reference the map more explicitly in the policy text, as you do in EN2.

We are concerned that the policy may not be sufficiently flexible or is too onerous for every piece of land identified on map 1. We consider that this policy, as part of the cumulative effect of the plan's policies, may not meet the basic condition of contributing to achieving sustainable development. We would like to discuss this further with you before you submit.

It is noted that previously this policy did not apply to every piece of land surveyed and numbered by Ecus.

There is no definition of 'appropriate conservation and mitigation measures', or what is considered to be biodiversity, or when this policy would specifically apply.

Is it being suggested that every application in these areas should have a biodiversity impact assessment or similar?

How would someone measure a 'net loss for biodiversity'? we see this being problematic, for example in a case when someone wants to build a house extension and it requires them to lose a number of their own plants, would they be expected to replace those plants elsewhere in their garden and if they can't would an application be refused?

Map 1 is not clear as there are no dark green areas of public park / public access shown despite being on the legend, and it's quite hard to see where the key garden blocks are. Only part of the BBEST area is covered by the map.

EN2 – ECOLOGICAL NETWORKS

The identified ecological networks which include key stepping stones (providing ecological connectivity and green infrastructure); allow for wildlife movement and encourage and support foraging; connect sites of importance; and contribute to the Plan area's biodiversity,

will be protected. Development will not be allowed to cause a break in the three identified ecological networks identified on Map 2. [map 2 refers]

We suggest you rename “key green corridors” on the first plan in map 2 to “ecological networks”, so that the term is consistent with the policy. You could also put the last two plans from map 2 in a different file, so that this background evidence containing “specific BBEST areas of wildlife corridor interest” is not confused with the “ecological network” designations referred to in the policy.

The Ecological Network/Key Green Corridor that bisects Northumberland Road is arguably undeliverable given the existing planning permissions north of Northumberland Road. This may mean the policy fails to have regard to national policy (NPPF para 2 (2012) and para 16b in the amended 2018 version applies).

The term ‘sites of importance’ is a rather vague and a definition would be helpful to demonstrate what this means. It is considered that without this it may be difficult to enforce this policy (NPPG para 041 applies).

The reference to enhancement which was in the previous version of the policy has been removed. It would strengthen the policy to put something in, in line with NPPF paras 117 and 174 (2012) and para 174 (b) in the amended 2018 version. We suggest adding ‘and enhanced where opportunities arise’, after ‘will be protected’.

Would a site be deemed undevelopable if it forms part of the network, this may be unreasonable – or would a % of the site need to be set aside, and should this be a linear strip? There is a lack of detail which needs to be addressed.

EN3 – LOCAL GREEN SPACE

This plan identifies and allocates the following local green spaces:

- *Hallamshire Triangle;*
- *St Marks Green.*

These spaces are indicated on map 3. They comprise significant breathing spaces in another wise densely developed environment; they are in close proximity to the people they serve; they are regularly used by the community; and are demonstrably special and hold particular local significance. Development of these sites will not be allowed except in very special circumstances.

We would suggest that you provide further evidence to support these designations (NPPG para 041 and NPPF para 37 (as amended 2018) apply). We suggest following Locality’s advice on “making local green space designations in your neighbourhood plan”:

<https://neighbourhoodplanning.org/toolkits-and-guidance/making-local-green-space-designations-neighbourhood-plan/>

What is the criteria being applied for these spaces being ‘special’ and to ‘hold particular local significance’?

A definition needs to be provided for ‘very special circumstances’ with justification/ evidence

We suggest using the word “designates” instead of “allocates”. Sites are typically “allocated” for development and local green spaces are “designated”. This might help those using your plan.

EN4 – TREES & TREE COVER

Trees along public highways, within public open spaces and within private open spaces where they are clearly visible from public viewpoints (identified on Map 4 as ‘high quality individual trees’), will be protected from loss.

Existing tree cover will be maintained and enhanced. Development that would reduce tree cover will be resisted and development will be encouraged to enhance existing tree coverage, particularly where coverage is low, or where coverage is reaching maturity [map 4 – definitions of low and maturity on map] and development will be expected to:

- Retain and integrate healthy, mature trees within the scheme unless their loss is justified; and*
- replace any trees lost to development, where appropriate;*
- and provide a sufficient amount of information to enable the impact of the development on the tree(s) to be properly assessed; and*
- tree planting schemes approved as part of any planning permission granted should be accompanied by an appropriate five-year management plan.*

We consider that there would be significant limitations to this aspiration, how would this be achieved? This policy seems to imply some degree of control over trees within the public highway, however, the highway trees are not really dealt with through planning but through the Council’s Streets Ahead maintenance and management contract. Therefore the policy couldn’t prevent their removal.

Trees in ‘private open spaces’ are referenced in the policy. As large amounts of the BBEST area falls within Conservation Areas, there is a degree of protection to trees that does not occur elsewhere. Where these spaces do not fall within a Conservation Area there is currently very little protection; hence many trees are often removed prior to making development proposals public. It would be helpful if you could clarify how this part of the policy would be implemented

The second paragraph is confusing, should it not just say something like existing tree coverage should be maintained and enhanced, but when their loss is justified (need to define justified) then the proposal should replace any trees lost, where appropriate (merge points 2- 3).

In the penultimate bullet we suggest some rewording to ‘...impact of the development resulting in the loss of tree(s) to be properly assessed’.

The final bullet is a standard part of the standard Landscape condition so duplicates existing requirements, we suggest deleting this NPPF para 16(f) (as amended 2018) applies).

We can work with you further on how the local list may support your policies. Examiners of some neighbourhood plans have highlighted that it is the role of the local list, not neighbourhood plan policy, to stipulate the information that has to be submitted with a planning application. Please note that the term 'local list' is alternatively used in relation heritage assets. We update our local list every two years and refer to it as Local Planning Application Requirements: <https://www.sheffield.gov.uk/content/sheffield/home/planning-development/local-planning-guidance.html>

A local list update is done in accordance with planning policy guidance: <https://www.gov.uk/guidance/making-an-application#Local-information-requirements> Since the 2013 Growth and Infrastructure Act the local list "must be reasonable having regard, in particular, to the nature and scale of the proposed development". Not all information we require from a developer has to be submitted with a planning application. Some information is required to ensure a development is delivered properly. Typically this is required as a planning condition rather than through the local list. Similar to the local list we need to be reasonable in making such conditions, plus if monitoring is involved this often means a cost to the planning authority that has to be accounted for.

SBC: Sustainable and Balanced Community

Objectives

- A. Maintain limits on shared housing*
- B. Maintain sensible density for quality of life*
- C. Improve quality of Housing, especially rental*
- D. Increase variety of housing available for key workers, first time buyers and starter homes*
- E. Ban 'To Let' signs*

SBC1 – SUPPORTING HOUSING DIVERSITY AND QUALITY

The development of HMOs including those created by conversion and/or change of use will not be supported within the designated Plan Area. All new residential development for the private rented sector including that created by conversion and/or change of use will be strongly encouraged to sign up to SNUG (see reference in introductory context section).

We would suggest that you rename the title of this policy as the policy text does not specifically discuss housing diversity or quality. Suggest "Creation of Houses in Multiple Occupation"

As this policy is more restrictive than the existing Core Strategy policy, we would recommend that additional justification is provided in order to demonstrate that this policy is not overly restrictive. Justification should address why all types of accommodation are considered not suitable for HMO use. For example conversion of flats above active uses such as shops or pubs may be appropriate and justifiable for use as HMOs. We also recommend considering building in a trigger to review the policy if the HMO density were to drop below a certain level.

We suggest the wording of Objective A is changed to reflect that Policy SBC1 creates an additional limit on HMOs within the BBEST area, rather than *maintaining* existing limits set by Core Strategy policy CS41.

We suggest removing reference to “flats, bedsits/studios” from the supporting text as the policy is aimed at HMOs. The policy wording - makes no reference to these types of homes.

For clarity we suggest using the word “permitted” rather than “supported”. The word “development” suggests that this would restrict any works requiring planning permission on existing HMOs (for example the creation of additional bed spaces or other extensions/alterations).

We do not believe encouraging SNUG registration is appropriate for planning policy. It is not an enforceable requirement; there is no distinction between house tenures within Planning Use Classes (meaning homes can change into PRS use without requiring planning permission). As SNUG is specific to student lets, it would be an overly onerous requirement on developments not intended for student occupation.

If this policy is to be taken forward we suggest the following policy wording and that it be supported with appropriate evidence to demonstrate that the NP is ‘prepared positively’ (NPPF para 16 (2012) and para 16 (b) in the amended 2018 version):

“The creation of new HMOs, including those by conversion and/or change of use, will not be permitted.

SBC2 – HOUSING TO MEET LOCAL NEEDS

All new residential development will be encouraged to meet local housing needs, particularly young families and young professionals, and will be expected to:

- *Provide a range of housing types and sizes, including for families, the elderly, and key workers; and*
- *include a proportion of housing suitable for newly forming households (this could include a proportion of starter homes).*

We have concerns that this policy, as it stands is not detailed enough to be justifiable and clear to enforce. We suggest that you should evidence that the policy is viable and deliverable (NPPF 16b (as amended 2018) applies). Without definitions for some of the phrases in the policy it is also ambiguous (NPPF 16d (as amended 2018) applies).

This policy will not be deliverable on smaller schemes where there are not enough new homes proposed to meet the criteria required by this policy. You should describe the differences between housing for families, the elderly, key workers and newly forming households, and whether units are allowed to meet more than one need. If the policy is aimed at larger developments, you should provide detail (and evidence) on what thresholds apply and the proportions/split of housing expected from the development.

Evidence is required to demonstrate what the 'local housing needs' are i.e. Strategic Housing Market Assessment (SHMA) (available online) and why newly forming households have a higher priority. The SHMA should be listed under 'SUPPORTING GUIDANCE AND EVIDENCE' as it is mentioned in the text. A new SHMA is currently being produced, and will be published in early 2019.

SBC3 – HOUSING DENSITY

All new residential development, including that created by conversion and/or change of use should respect the townscape character and be developed at a density which is in keeping with and protects the character of the surrounding area unless material considerations indicate otherwise.

In isolation we are concerned that this policy may not meet the basic condition of being in general conformity with the strategic policies contained in the development plan (NPPF para 184 (2012) applies). In particular, it is not a distinct local approach to UDP policy H14. It potentially represents a blanket approach to allowing exceptions to Core Strategy policy CS26, which seeks to make efficient use of land by setting out appropriate density ranges for different locations depending on accessibility.

The paragraph preceding the policy refers to it being “appropriate to set thresholds for the preferred density of development within the Plan Area”. However, the policy does not do this. Scale and density is mentioned in the draft Design Guidelines but there is no cross-reference to these in the policy. Furthermore, several of these density guidelines are “preserve existing density”, which may be contrary to achieving sustainable development.

The new NPPF continues to allow the use of minimum density standards, or range of densities to ensure that land use is optimised (2018, para 123), especially in areas where there is an anticipated shortage of land to meet housing needs. The Sheffield Plan will retain a policy setting out appropriate density ranges in different areas, with specific circumstances where exceptions can be made, in a continuation of current Core Strategy policy CS26. If the role of SBC3 is to set a general exception for the BBEST area based on character, it should be clearer about under what circumstances development will be permitted within the ranges set out in Local Plan policy. One solution would be to remove the policy as it appears to conflate density with character, and would not add to the provisions of the Core Strategy (and may contradict it). An option would be to enhance policies relating to character to ensure that exceptions to the Core Strategy, based on character, can be most successfully implemented where appropriate. It would be helpful if the plan could hone into what specific issue this policy is trying to deal with. For example, if the issue is 'garden grabbing' (which does have a relationship to both character and density), then the policy should seek to deal with this issue directly.

SBC4 – SPACE STANDARDS FOR HOUSING

All new residential development, including that created by conversion and/or change of use is expected (as a minimum) to adhere to the space standards set out in the Technical Housing Standards - Nationally Described Space Standard and any successor document.

Table 1 - Minimum gross internal floor areas and storage (m²)

| Number of bedrooms(b) | Number of bed spaces (persons) | 1 storey dwellings | 2 storey dwellings | 3 storey dwellings | Built-in storage |
|-----------------------|--------------------------------|----------------------|--------------------|--------------------|------------------|
| 1b | 1p | 39 (37) ² | | | 1.0 |
| | 2p | 50 | 58 | | 1.5 |
| 2b | 3p | 61 | 70 | | 2.0 |
| | 4p | 70 | 79 | | |
| 3b | 4p | 74 | 84 | 90 | 2.5 |
| | 5p | 86 | 93 | 99 | |
| | 6p | 95 | 102 | 108 | |
| 4b | 5p | 90 | 97 | 103 | 3.0 |
| | 6p | 99 | 106 | 112 | |
| | 7p | 108 | 115 | 121 | |
| | 8p | 117 | 124 | 130 | |
| 5b | 6p | 103 | 110 | 116 | 3.5 |
| | 7p | 112 | 119 | 125 | |
| | 8p | 121 | 128 | 134 | |
| 6b | 7p | 116 | 123 | 129 | 4.0 |
| | 8p | 125 | 132 | 138 | |

Extract from the Technical housing standards – nationally described space standards

We support this policy in principle, and would suggest that you add ‘unless material considerations indicate otherwise’ which is also included in SBC3. The policy and supporting evidence should be in accordance with Planning Policy Guidance (PPG): ‘Housing: optional technical standards’²

Proportionate evidence of need is required; ‘Local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their [Local Plans](#)’ (PPG Paragraph: 002 Reference ID: 56-002-20160519).

The impact of introducing this policy should also be tested as part of a viability assessment (PPG Paragraph: 003 Reference ID: 56-003-20150327).

Please note a HMO over 7 people is sui generis and not residential development so this property type should be added for clarity.

SBC5 – HOUSING DESIGN AND LAYOUT

In terms of its design and layout all new residential development, including that created by conversion, change of use and alteration and extension, is expected to have regard to the contents of the BBEST Design Guide and the wider objectives of the Neighbourhood Plan as they relate to access, travel, design, heritage management and the environment. Proposals for development will be assessed against this policy and the policies contained within the DDHM Chapter of the Neighbourhood Plan.

² <https://www.gov.uk/guidance/housing-optional-technical-standards>

The reference to the Design Guide is appropriate, but we query whether the rest of the policy is needed; as it is clear that the wider objectives of the plan will be applied.

The design guide does not cover accessible/inclusive design. Omission of (c) from the previous version of this policy is therefore a backward step.

SBC6 – HOMES BUILT FOR LIFE

All new residential development including conversions and/or changes of use should be 'built for life' and will be expected to meet the criteria set out in part M4(2) of the Building Regulations (and any successor document) this means that new dwellings should incorporate features that make them suitable for a wide range of occupants, including older people, those with reduced mobility and wheelchair users.

Any residential development by way of conversion from a single dwelling or commercial unit to flats/maisonettes/apartments/duplex should solely provide accommodation of three bedrooms or more.

We support the first paragraph of this policy in principle. We suggest that you add 'where practicable ' into the first paragraph. The policy and supporting evidence should be in accordance with Planning Policy Guidance: 'Housing: optional technical standards'³

Whilst properties built to M4(2) can be used by people in wheelchairs they are not fully accessible. Category M4(3) provides wheelchair accessible housing. The percentage required for each type should be stipulated, however properties cannot be required to meet both M4(2) and M4(3). M4(3) properties are significantly larger than M4(2) and proving viability will be more challenging.

Proportionate evidence of need is required; 'Local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their [Local Plans](#)' (Paragraph: 002 Reference ID: 56-002-20160519). We will discuss this further with you.

The impact of introducing this policy should also be tested as part of a viability assessment (Paragraph: 003 Reference ID: 56-003-20150327).

Lifetime Homes standards and our disability design standards are still included in the supporting guidance and evidence. While Lifetime Homes standards provide some helpful features which are not included in M4(2) standards, only M4(2) and/or M4(3) can be required as far as planning policy is concerned. The disability design standards referred to do not apply to dwellings and Approved Document M: Volume 1 could helpfully be added to the supporting guidance.

³ <https://www.gov.uk/guidance/housing-optional-technical-standards>

M4(2) and M4(3) apply only within the curtilage of dwellings or blocks of flats. It would therefore also be helpful to include the inclusive design standards applicable to the public realm within housing developments within the supporting guidance for this document as well as the Building Regulations approved document, or at least a requirement for inclusive design of those areas.

As it stands, the second paragraph does not fit with the context of policy (Homes built for life), and may be better being incorporated into another, more relevant policy (For example, SBC2). However, we currently have reservations in regard to this section of policy as there is currently no justification or rationale provided as to why subdivision into studio/ one/ two bed properties is unacceptable in the BBEST area.

You will need to evidence the choice of why 3 bedrooms have been chosen, and how this positively plans for the housing needs of different groups in the community (NPPF para 50 (2012) and para 61 in the amended 2018 version). You will need to show you have not made general assumptions on the bed/space requirements of differing household types (properties with fewer bedrooms would elsewhere be classed as adaptable and flexible homes for example).

The policy will also need to address cases where the unit is not big enough to provide three bedrooms and meet the space standards policy. We also believe it is unreasonable to place restrictions such as these on existing properties, but not to have similar requirements applying to new developments (which arguably, may be more suited to providing larger unit types anyway).

This Policy would not prevent creation of smaller units in some cases, as conversions of some properties can be made through the Prior Notification process (e.g. Office to Residential conversion) rather than requiring planning permission.

BC: Broomhill Centre

Objectives

- *Encourage economic activity and growth*
- *Encourage the retention and expansion of independent retailers*
- *Enhance the public realm*
- *Improve the function of pedestrianized areas*
- *Lift the quality of design more generally amongst the building stock*
- *Protect and enhance features of townscape interest and heritage significance*
- *Protect and enhance areas of open space, which are considered to be of value to the wider community*
- *Improve the environment (including air quality and noise) for visitors*
- *Improve connections with the wider community*
- *Reduce dependence on travel to/from and through the area by car*
- *Restructure the function and distribution of car parking*

The public realm needs to be enhanced, the pedestrianised areas improved, and connections to the wider community improved to meet current inclusive design standards.

The last two objectives need to be implemented in ways which do not restrict access by disabled people who rely on their vehicle for their mobility. Restructuring parking provides the opportunity to upgrade accessible facilities to current standards.

BC1 – PROMOTING BROOMHILL CENTRE

Development proposals within the Broomhill Centre area will be supported where it is demonstrated they:

- *retain/provide an active frontage (including front doors, windows and existing shop fronts); and*
- *contribute to the creation of a lively and vibrant centre; and*
- *maintain a balanced mix of main town centre uses; including retail, food & drink, leisure, commercial, office, tourism and residential; and*
- *include residential properties on upper floors only; and*
- *improve the public realm [Map 7].*

Without an explicit cross-reference to your definition of Broomhill Centre the policy is ambiguous (NPPF 16d (as amended 2018) applies). We suggest a cross-reference is made to either the adopted UDP boundary for Broomhill District centre, or the boundary for Broomhill Centre Plan in map 6.

This policy lacks local distinctiveness over and above national and local planning policy (CS34, S7 and S10). The policy needs to be clearer about what is expected of developments in Broomhill Centre. Suggestions are as follows:

Bullet points 1 & 2

‘Retain/provide an active frontage’. This needs defining more precisely thought is required on how it differs from the second bullet point – ‘contribute to the creation of a lively and vibrant centre’. It is suggested that the two could be combined and defined as: ‘Incorporating attractive and varied window displays or showing social activity within the building during the daytime at street level, and ensuring that footfall is maintained and main entrances open onto the street.’ This definition encompasses the range of main town centre uses (e.g. shops, cafes or community uses). We suggest, therefore, that bullet points one and two are combined with a clear definition included in the footnote of the Neighbourhood Plan.

Bullet point 3

In the introductory paragraphs to the Plan and in the commentary to this policy it is explained that shops are very important to local residents, and there is a desire to encourage independent retailers and shape the operation of the centre. This bullet point in the policy doesn’t live up to that expectation. The policy needs to define what a ‘balanced mix’ looks like to ensure the policy is applied consistently in determining planning applications. One way to do this is to require developments and changes of use to ensure that at least 50% of the units in the Centre remain in shop use (A1) otherwise the Centre could be overrun by late night uses for example. The percentage could be higher or lower as long as its justified in the commentary.

Bullet point 4

Do BBEST want all new developments in the Centre to include residential development on upper floors? That's how it could be read. If not, then it just needs rewording to ensure that, where proposed, residential is on upper floors. It's worth considering if there might be some sites where residential could be accommodated to the rear of the frontage unit and not necessarily on upper floors.

Bullet point 5 - improve the public realm

This needs to explain what is going to be required by an applicant. Is it the intention that every proposal in the Centre will have to make a financial contribution to the proposed public realm area shown on Map 7? If so, there are a few issues with this. Firstly, pooling S.106 contributions are not allowed under the current legislation it could not be delivered through that means. Secondly, planning obligations must only be sought where they meet all of the following tests:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

We consider the criteria above would only apply to the shops directly facing the proposed public realm area, and only if there was a comprehensive redevelopment of those units. A separate policy could be introduced that dealt with that eventuality. It couldn't be applied to a change of use application or to applications for new build elsewhere in the Centre.

Alternatively, BBEST could recommend CIL or other potential funds as a way to deliver BC3 Improving the Public Realm.

Suggested re-wording:

Developments and changes of use within the Broomhill Centre area will be supported where it can be demonstrated they:

- retain/provide an active frontage that contributes to the creation of a lively and vibrant Centre⁴; and
- maintain a balanced mix of main town centre uses; including (proportion – 50%?) retail, food & drink, leisure, commercial, office, tourism and residential; and
- places residential properties to rear of the frontage unit or on upper floors.

The public realm would need to be improved to meet current inclusive design standards. It would be helpful to include the inclusive design standards applicable to the public realm within the supporting guidance and evidence. Other improvements such as street trees and planters similarly need to meet inclusive design standards.

⁴ Defined as incorporating attractive and varied window displays or showing social activity within the building during the daytime at street level, and ensuring that daytime footfall is maintained and main entrances open onto the street.

BC2 – SHOP FRONT DESIGN

Development involving the creation of a new shop front or alteration(s) to and extension(s) of an existing shop front or other active frontage, is expected to have regard to the policy DDHM5, and to:

- *Be of the highest quality;*
- *respond to the character of the building(s) of which it forms part;*
- *respond to and integrate the positive characteristics of the immediate surroundings;*
- *enhance levels of accessibility within the Shopping Centre; and*
- *maintain independent ground floor access to the upper floors, except where a safe and convenient rear or side access is available or is provided as part of the development.*

We would suggest that you add a cross reference to the Design Guide in the policy.

Please define what the 'highest quality' would be.

We have concerns that this policy lacks local distinctiveness (NPPF para 16(f) (as amended 2018) applies). Unlike the local plan, it is more able to be street specific. Physical aspects of shopfront design i.e. shutters, lighting should be included in terms of quality expected. Also include inclusive design within the quality expected. Similarly, access to the upper floors needs to be as inclusive as can reasonably be achieved.

BC3 – IMPROVING THE PUBLIC REALM

*As developments come forward within the Broomhill Centre opportunities to restructure the existing parking arrangements within the public realm area identified on **Map 7** a will be explored with a view to providing a shared space, which would be available for one off events such as markets or music events.*

Some clarity needs to be provided on what the anticipated developments and opportunities are; this is quite vague and the context for the policy needs to be set.

Are the public realm improvements referred to here and earlier just limited to restructuring the parking arrangements and creation of shared space? More details need to be provided on what the improvements actually include.

As earlier, the public realm needs to be improved to meet current inclusive design standards. Restructuring parking needs to be implemented in ways which do not restrict access by disabled people who rely on their vehicle for their mobility, and provides the opportunity to upgrade accessible facilities to current standards.

As advised in previous comments, proposals relating to restructuring of on-street parking are highways rather than planning policy matters.

It is important to be aware of the recent advice from DfT regarding shared space schemes. The [Inclusive Transport Strategy \(July 2018, DfT\)](#) requires authorities to pause the introduction of new shared spaces that feature a level surface. **Ministers**

clarified on 28th September 2018 that the focus of this pause is on level surface schemes in areas with relatively large amounts of pedestrian and vehicle movements. It is therefore suggested that we meet to discuss this policy in more detail and whether it is included in your NP. If this policy is retained, please note at this stage that the creation of shared space needs to be treated with great caution, particularly considering the high traffic flows on the streets within Broomhill Centre. If the delineation between vehicle and pedestrian areas is reduced too far, shared space schemes can impact severely on the independent mobility of disabled and older people - resulting in 'no go areas'. The need to retain standard kerb upstands and signal controlled crossings has been emphasised by disabled people.

AT: Active Travel

We believe that, as advised earlier, some of the issues covered within this section are outside of the scope of the Neighbourhood Plan. Some parts of the Plan are proposals or actions relating to highways matters rather than Planning policy matters. We have noted briefly where we have concerns and would like to discuss this section with you in more detail before you submit.

Whilst we cannot endorse the background information on travel issues in this section of the Plan, we acknowledge that this analysis is the interpretation and viewpoint of BBEST. However, with reference to paragraph 3 on page 22 which states that “the strategy for traffic management will be informed by a thorough review of the impact of motor traffic on pedestrians and cyclists”, we would suggest that this is a proposal which is outside the scope of the Neighbourhood Plan, and query who would be undertaking this review?

We would suggest clarifying the information in paragraph 3 on Page 23 as this appears to misquote Core Strategy Policy CS54 which sets out the means by which travel demand will be managed, rather than being a ‘programme’ of measures. The paragraph also suggests that the pedestrian routes listed are the priority, rather than being one of a number of priorities set out in CS54. It should also be noted that the Sheffield Transport Strategy which was endorsed by Cabinet in July 2018 proposes a new approach to transport across the city, including the emerging priorities for active travel.

Objectives

Through its policies, the Plan will aim to:

- A. Improve pedestrian and cycle Routes*
- B. Decrease the impact of traffic*
- C. Restructure car parking*
- D. Improve air quality*
- E. Improve public transportation*

Restructuring parking will provide the opportunity to upgrade existing parking facilities for blue badge holders = primarily in front of the shops on Fulwood Road - to meet current standards. If (C) refers to on-street parking then this is a highway matter rather than planning policy.

A. IMPROVED PEDESTRIAN & CYCLE ROUTES (pg24)

References are made to 'the strategy to reduce traffic impact' but it is not clear which strategy this refers to – does it mean the Neighbourhood plan? We would suggest updating references to cycling to refer to the endorsed Sheffield Transport Strategy and emerging Local Cycling and Walking Infrastructure Plan (which will be consulted upon separately).

AT1 – ACCESS AND MOVEMENT

- *A number of key access and movement corridors in need of improvement to make them safer and more attractive and to facilitate and encourage increased levels of accessibility and ease of movement within/through the Plan Area on foot, by cycle and public transport have been identified (see Map 8 of walking and cycle network).*
- *All major development which affects any part of the identified network of access and movement corridors will be expected to contribute towards their improvement.*
- *Development which has an adverse impact on existing levels of safety, accessibility and ease of movement along the identified access and movement corridors will be resisted.*
- *CIL contributions payable in connection with new development will be used to support the objectives of Policy AT1. [Map 8]*

The map (Map 8) is a new addition to this policy since previous comments were made. It is not clear on Map 8 what the routes represent and how they have been identified. We would like to discuss this further before you submit.

As previously advised we suggest that you clarify what 'major development' is and what is meant by "contribute to improvement", as this could be interpreted as a contribution to the design and implementation of the proposal, or a CIL / S106 contribution.

In bullet point 2 a definition would be helpful for what is meant by 'affects' and how this would be measured.

In the final bullet you need to clarify that you are referring to the neighbourhood portion of CIL contributions after adoption of the Plan. Neighbourhood planning policies cannot stipulate how the "central CIL pot" is spent, therefore we suggest adding "The neighbourhood portion of the CIL contributions ...". Furthermore, the Plan cannot allocate CIL funds, as this is outside of the remit of a Neighbourhood Plan. We suggest an amendment to the 4th bullet point to replace the word "used" with "sought".

We also suggest that you consider reviewing the wording of bullet 3, with reference to NPPF para 32 (2012) which has subsequently had more detail added in para 109 (as amended 2018) which states that "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."

As previously, and against national inclusive design standards, the policy and map 8 do not acknowledge the need for pedestrians and cyclists to be kept separate,

preferably by a level difference - 'step down to danger' - if a negative impact on the independent mobility of disabled and older people is to be avoided. Map 8 does not distinguish between pedestrians and cyclists in existing footpaths, publicly available routes, proposed new links, or the gold route.

The policy needs to acknowledge that the improvements it refers to need to include access improvements to provide increased accessibility for all members of the community.

AT2 - SUSTAINABLE SAFETY FRAMEWORK

In support of Policy 5A of the city's Transport Strategy, the 'Sustainable Safety' approach will be adopted in order to support the safety and convenience of pedestrians and cyclists (see Map 8 of cycling and walking network). This will ensure a direct response to the level of threat posed by motorised traffic to vulnerable users.

In the "Arterial Streets" (Brocco Bank/Clarkehouse Road; Glossop Road, Clarkson Street, Manchester Road, Fulwood Road, Whitham Road and Newbould Lane/Nile Street/Crookes Road) that carry large volumes of motor traffic:

- *Pedestrians and cyclists will be separated safely and conveniently from heavy traffic whilst ensuring a street with a real sense of place in which to walk, cycle and enjoy outdoor city life.*
- *Before and until such segregation is achieved, permitted traffic speeds will be reduced from 30 to 20 mph and enforced.*
- *In the remaining "Access Streets" (all adopted roads that are not 'arterial roads/streets' or 'through national/regional routes' within the BBEST area) measures will be taken to ensure that motor vehicle flows in the busiest hour do not exceed the equivalent of around 400 cars and not more than 6 full-size buses each way, and that speeds do not exceed 20mph.*
- *All major development which affects any part of the street network will be expected to contribute towards its improvement.*
- *Development which has an adverse impact on existing levels of safety, accessibility and ease of movement will be resisted.*
- *CIL contributions payable in connection with new development will be used to support the objectives of Policy AT2.*

It is noted that this policy is a new addition that has not appeared in previous versions. We acknowledge the alignment with the sustainable safety principles in the new Sheffield Transport Strategy, but would like to discuss this policy in more detail with you before you submit. Some of the bullets are highway rather than planning matters (eg speed limits). See also previous comments in AT1 regarding CIL, definition of 'major development' and "resisting" development, and Map 8.

This policy and Map 8 do not distinguish between walking routes and cycling routes, although pedestrians need to be kept separated from cyclists (preferably by a change in level - 'step down to danger') in the same way as they need to be kept separated from other vehicles. There are many places on the arterial routes where

cyclists could only be kept separated from other vehicles by allowing them to use the footway, which would be completely unacceptable in such streets.

It is not clear how the number of vehicles will be restricted, but the chosen method should not impede access by blue badge holders.

Bullet point four should have 'when this impact cannot be suitably mitigated' at the end.

AT3 – PARKING MANAGEMENT AREA WIDE

The existing Controlled Parking Zone (CPZ) will be reviewed in order to:

- *Expand the CPZ into other parts of the BBEST area.*
- *Eliminate the unrestricted on-street parking that is currently available to commuters.*
- *Support the policies for Housing and for the Broomhill Centre in the Neighbourhood Plan.*
- *Policy AT3 should not compromise the objectives set out in Policy SBC6.*

It is noted that changes have been made since the previous draft. As this purely concerns on-street parking it is a highways proposal rather than a planning policy so should not be part of the NP policies, it could potentially be moved to community actions.

As a highways proposal, you should note that adequate provision for parking by disabled people as blue badge holders needs to be made in any expansion of the CPZ and may well need to be made retrospectively within the existing parking zone. Similarly, parking restrictions introduced where on-street parking is currently available need to make adequate provision for parking by blue badge holders.

AT4 – AIR QUALITY

All new major development will be supported by a full Air Quality Assessment. Development which is found on examination to have a demonstrably negative impact on air quality within the worst air quality areas along the Broomhill Corridor will not be supported.

Air Quality issues are being considered by the council on a 'whole city' basis. Sheffield has been identified by the Government in its National Air Quality Plan as an area in exceedance for Nitrogen Dioxide (NO₂) gas which means that there is a need to tackle vehicle emissions in order to become compliant with the European health based limits for this air pollutant in the 'shortest possible time' and before the end of 2020 latest. Sheffield's Clean Air Strategy (December 2017) sets out the scale of the challenge and an action plan to improve air quality.

A Government funded joint Sheffield & Rotherham Clean Air Zone Feasibility Study is on-going. The study will determine for the city what measures need to be taken forward, and where, on the basis of what is effective and what will be required to achieve the necessary improvement in air quality. City wide consultation will follow. In the light of this city-wide on-going work we have reservations about this draft policy. We are currently not in a position to advise on the outcomes of the study but

consider that it is appropriate for us to flag that any emerging Council strategy or policy would very likely supersede your draft policy, in accordance with NPPF para 181 (as amended 2018) which requires that “planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan”.

We would also query how the policy proposes to determine when and where an Air Quality Assessment is needed. Similarly to the comments for AT5 on Transport Assessment, the Council has existing thresholds for when an Air Quality Assessment is required (in the local planning application requirements) and setting a different threshold would be confusing and inconsistent. We would also query how the policy intends to determine what a ‘demonstrably negative impact’ is, and how that could be taken into consideration as a potential grounds for refusal.

AT5 – TRANSPORT ASSESSMENTS AND TRAVEL PLANS

All major developments within the Plan Area are expected to be accompanied by a Transport Assessment (in the case of smaller scale ‘Major’ development this may comprise a transport statement) and shall incorporate a Travel Plan so that the full extent of the development’s impact on (pedestrian, cycle and vehicular) access, movement and safety can be assessed to ensure there are no adverse impacts. Once implemented, Travel Plans prepared for development with the Plan Area will be monitored to ensure compliance.

The definition of when a Transport Assessment is needed should tally with our local planning application requirements, which are set out on our website. Having a different trigger point would be confusing and inconsistent.

We have previously advised that Transport Assessment requirements are included in the Local Planning Application Requirements which apply to the whole city. Core Strategy policy CS53 includes Travel Plans and the “Sheffield City Council Guidelines for the Preparation of Transport Assessments and Travel Plans, 2004” provides more detailed information on the requirements for Travel Plans. Please see comments relating to the ‘Local List’ under EN4 above.

We would query who would undertake the monitoring role and how it would be done?

Development, Design and Heritage Management

Objectives

Through its policies the Plan will:

- A. Promote heritage management*
- B. Promote the contents of the BBEST Design Guide*
- C. Preserve and enhance townscape character*
- D. Conserve community assets*
- E. Promote master planning for key development sites*

Comments on the Design Guide will be sent to you separately as this does not form part of the Neighbourhood Plan.

DDHM1 - KEY DESIGN PRINCIPLES

Policy DDHM1 should be read together with the BBEST Design Guide.

As noted earlier the Plan defines eight Character Areas. These are identified in the Design Guide and are referred to as:

- 1. Crookes Valley*
- 2. Hospital Quarter*
- 3. South East*
- 4. North East*
- 5. Retail Centre*
- 6. North West*
- 7. South West*
- 8. Endcliffe*

Development will be expected to respond to the characteristics that are particular to each of the Character Areas by:

- i. Respecting the proportion and traditional forms of roof design; and*
- ii. Ensuring that original roofing materials are retained; and*
- iii. Respecting the 61 degree diagonal proportions and architectural detail of original fenestration including cills and lintels; and*
- iv. Retaining and reflecting the defining architectural features; and*
- v. Reflecting the prevailing materials palette (including colour); and*
- vi. Maintaining important views; and*
- vii. Reflecting the prevailing density; and*
- viii. At the very least, maintaining the existing balance of uses.*

In addition:

- a. New flat top dormer windows and roof lights will not be encouraged where they are visible from the street.*
- b. Signage (in terms of design, size, colour, materials, proportion and position) within the Plan Area shall be kept to a minimum. Where signage is required, it should be sensitively designed to respect the character of the host building/structure/site and it should not obscure architectural features.*
- c. Historic boundary treatment will be retained and where possible reinstated and a strong and consistent approach shall be maintained towards new boundary treatment in line with the character of the Area.*
- d. Mature trees will be retained and tree planting opportunities will be pursued as development comes forward.*
- e. Lighting for institutional uses will be well designed and coordinated across the Character Areas.*
- f. Where present, original floor scape materials will be preserved and where appropriate the original floor scape particular to each Character Area shall be repaired and/or restored. Wherever possible stone sett thresholds to properties will be reinstated/restored.*
- g. Front gardens, where they exist will be retained and every opportunity will be taken to reinstate front gardens as development comes forward.*
- h. Building lines will be respected.*
- i. The removal of chimneys from buildings within the Character Areas will be resisted.*
- j. Enhancements to the public realm will be sought where appropriate.*

Under part h the following rewording is suggested 'established building lines will be respected'.

This policy and the design guide are an ideal opportunity to flag up the need to adopt inclusive design standards for all development within the BBEST area but that has not been achieved. Authoritative inclusive design standards should then be included in the supporting guidance and evidence.

Please see comments below re signage design and below re stone sett thresholds. Public realm enhancements need to be inclusively designed.

This policy seems to rule out flat roofed contemporary buildings, which is not reasonable. There should be something in the Plan that promotes high quality contemporary development.

Section viii says 'At the very least, maintain the existing balance of uses'. It is not clear why this is here as it is a land use issue dealt with elsewhere in the plan and is not specific.

DDHM2 - DEVELOPMENT WITHIN THE CROOKES VALLEY CHARACTER AREA

Development within the Crookes Valley Character Area will be expected to respond to the strong traditional materiality that is present and comply with the objectives of DDHM1. In addition, development should respond specifically to the scale, grain, layout, setting and appearance of the traditional building stock.

DDHM3 - DEVELOPMENT WITHIN THE BROOMHILL CENTRE CHARACTER AREA

Development within the Centre Character Area will be expected to enhance the wider townscape and to support the area's core role as a shopping area and comply with the objectives of DDHM1. More specifically:

- a. Active frontages will be retained at ground floor level;*
- b. Shopfronts will be expected to be of a high quality and their design should respect the features of the building above, bringing them down to ground level;*
- c. Shopfront fascias should not obscure the building's original features;*
- d. Externally mounted shutters will be resisted;*
- e. New buildings should sit at the back edge of the pavement except in exceptional circumstances where a setback is incorporated to accommodate communal/public/spill out space;*
- f. The scale of development will be expected to range from 2 to 5 storeys in height, depending on the context and should be built out to adjacent party walls where they exist;*
- g. Development will be expected to create a continuous frontage along the principal streets;*
- h. Where appropriate, development will be expected to introduce new street trees and planters to provide an attractive feature, offer shade and help combat air pollution.*

High quality shopfronts need to be inclusively accessible.

DDHM4 - DEVELOPMENT WITHIN THE RETAIL CENTRE

Map 6 identifies the Broomhill Retail Centre. CIL accrued on development within this area will be expected to contribute towards the improvement of the area of public realm identified on Map 7. The Plan is specifically seeking to deliver additional greening and the provision of space(s) which would be available for one off events such as markets or music events.

In addition any proposals for redevelopment within the Retail Centre:

- (a) Will be expected to incorporate a car parking strategy to include disabled access and a limited number of drop off and collection spaces within the identified area of public realm, which is to be used as a shared space; and*
- (b) Replace the existing publicly accessible (roof top) car parking.*

It is outside of the remit of a Neighbourhood Plan to determine what CIL funding will be spent on. Therefore, it may be more appropriate to use the word “sought” instead of “expected”.

We appreciate that it has been the subject of previous discussions, but omission of Spooner Road car park - which primarily serves the retail centre - appears to be anomalous.

Inclusion of disabled access within the car parking strategy is very welcome, and needs to meet current standards - including accessible drop off areas. As above, care needs to be taken in establishing a shared space to ensure that the area remains safely and conveniently accessible for all pedestrians.

While replacement of the roof top car park would be very welcome in principle as it appears to be inaccessible for disabled pedestrians, it is difficult to see how or where that capacity could be accommodated at ground level. Priority needs to be given to the provision of accessible parking spaces.

Is bullet (b) about replacing lost parking should the existing rooftop car park be redeveloped? Or is it a proposal to replace the (privately owned) car park? Please see earlier comments for BC3 in relation to shared spaces.

DDHM5 - SIGNAGE WITHIN THE RETAIL CENTRE

New/replacement signage will be expected to bring coherence to the Retail Centre and well designed, bespoke signage will be encouraged. More specifically:

- a. New signage should be set within a consistent zone within the building frontage, above the shopfront. The design, size, colour, materials and position of signs should respect the character of the building with individual letters not exceeding 400mm in height. Signs should not obscure architectural features such as windows, cornices, transoms and mouldings.*
- b. Individual lit lettering will be acceptable but whole illuminated fascias (e.g. light box signs) will be resisted.*
- c. The use of A boards will be discouraged.*
- d. Projecting signs should be in line with the fascia of the shopfront.*

Limiting lettering to 400mm in height appears to be unreasonable, what is the justification for this?

We would like to highlight that national guidance has always steered Local Planning Authorities away from dictating colour of signage, it might therefore be useful to justify this.

This is an opportunity to introduce key inclusive sign design standards - as in the 'Sign Design Guide'. Individual lettering would usually be resisted as a signboard providing sufficient contrast with both the background and the lettering is a key aspect of inclusive signage.

Discouraging A-boards is welcome. A-boards and other obstructions are ongoing concerns for disabled people.

Under part d. we suggest some rewording so it states 'Projecting signs should be aligned with the fascia of the shopfront', rather than in line.

DDHM6 - DEVELOPMENT WITHIN THE HOSPITALS, SOUTH EAST AND SOUTH WEST CHARACTER AREAS

Development will be expected to preserve the existing balance of uses within these areas within; and the historic character of the areas and should comply with the objectives of Policy DDHM1. In addition:

- a. Development will be expected to respond to the scale, grain, layout, setting and appearance of the historic villas;*
- b. Development that seeks to amalgamate buildings will be expected to ensure that the individual buildings can still be understood in their own right;*
- c. Extensions to buildings of townscape merit should be set back and recessed from the main façade;*
- d. The loss of stone sett thresholds to properties will be resisted and stone sett thresholds will be reintroduced, wherever possible;*
- e. The introduction of wayfinding will be encouraged to help improve the legibility of the hospital complexes.*

It is not clear where 'stone sett thresholds' refers to, but if it means vehicle crossovers to properties the proposal should be resisted. Stone setts frequently create surfaces which are unsuitable for disabled pedestrians.

Re wayfinding, please see the comment above re meeting inclusive signage standards in accordance with the 'Sign Design Guide'.

We consider that the first element of the policy about preserving the balance of uses has an overlap with local land use policies and could be considered as a duplication. (NPPF para 16 (f) (as amended 2018) applies).

DDHM7 - DEVELOPMENT WITHIN THE NORTH EAST AND NORTH WEST CHARACTER AREAS

The residential character of the North East and North West areas will be preserved and protected. More specifically:

- a. Development will be expected to preserve the existing scale, grain and layout that is particular to these two Character Areas;*
- b. Opportunities will be taken to reintroduce boundary walls where they have been lost;*
- c. Every effort will be made to ensure that the open spaces adjacent the Nottingham Public House (164 Whitham Road, S10 2SR) and Spiritualist Church (109 Whitham Road, S10 2SL) are preserved;*
- d. Every effort will be made to introduce shared bin storage to allow bins to be stored without causing street clutter;*
- e. The setts which surface Chandos Street and Hoole Street shall be preserved.*

Setts frequently provide surfaces which are unsuitable for disabled pedestrians.

Part e - The surfacing of existing adopted streets is not something controlled by planning. It is an appropriate issue to refer to in a conservation area management plan, but not within a policy of a neighbourhood plan.

We consider that Section c) is unreasonable as any development will be judged on its own merits and against policy, including their policies.

DDHM 8 - DEVELOPMENT WITHIN THE ENDCLIFFE CHARACTER AREA

Development will be expected to preserve the existing balance of uses; landscape character of and sense of openness within the Endcliffe Character Area. Street trees are essential to the character of this area and should be retained. Where their removal and replacement is necessary; any replacement trees should be of a size and species that will, in time, provide a similar character within the townscape.

We consider that the first element of the policy about preserving the balance of uses has an overlap with local land use policies and could be considered as a duplication. (NPPF para 16 (f) (as amended 2018) applies).

Community Actions and Projects

The Neighbourhood Planning Forum has identified a number of wider aims other than those directly related to the use of land. It wants to encourage the development of relevant ideas and actions to take these forward.

These will not be statutory, and they will be the responsibility of various different bodies, some yet to be identified. It is intended that these should be given higher status in funding decisions about CIL.

The majority of the enhancements identified are highways proposals. We cannot commit to these in isolation of our own citywide strategies and plans and would advise that these are discussed with us further.

Boulevard Project

The Broomhill Centre to Sheffield University Corridor The busy A57 carries some 20,000 vehicles per day. Around the same number of pedestrians use it, or feeder

streets, each day. It is a key route for access to hospitals, shops, and the University. It forms the 'spine' of the BBEST neighbourhood. It is in urgent need of design changes to make it a much more attractive place to travel along by foot, by cycle, by bus, and to make the experience of getting to and using shops, hospitals or the university much more pleasant. It needs to become a Boulevard.

Why Boulevard? Boulevards are pleasant places to spend time - on foot, on bikes, in and outside cafes, restaurants and shops, with substantial amounts of greenery - but they are also busy streets, carrying large amounts of traffic. A boulevard is not a pedestrian precinct, but it is a place where there's a better relationship between motorised traffic and people wanting to enjoy being in the street.

Vision

A street with a real sense of place in which to walk, cycle and enjoy outdoor city life whilst continuing to allow vehicular movement, albeit at lower speeds, with lower pollution levels, and with much less detriment to the street scene.

Objectives

- To create a much improved environment in the Broomhill shopping centre, thereby increasing its attractiveness to both visitors and businesses.
- To bring air quality up to European standards in accordance with legal requirements.
- To make the walk from Endcliffe to the University and points in between more pleasant, thereby encouraging more people to do it.
- To make the experience of getting to and from the hospitals more pleasant.
- To make cycling along the same route more pleasant, thereby encouraging more people to do it.
- To further enhance the declared "townscape merit" of buildings identified as such within the Broomhill Conservation Area.
- To create conditions in which drivers of cars, vans, lorries and buses, and also cyclists, concede greater priority to pedestrians seeking to move along and to cross the street
- To decrease the number and severity of Road Traffic Accidents (RTAs).

Partnership working

The idea of the Boulevard forms a community action within the BBEST Neighbourhood Plan. Major improvements can be achieved if funding can be found as part of the City or City Region's capital programmes, or if developments by the university, hospitals and others on the route take place which can contribute to the Boulevard - for example, by imaginative planting, uninterrupted pavements, public art, and a good quality of design to create attractive public spaces.

Possible enhancements

- Centred on the Whitham Road/Northumberland Road junction, a "shared space" scheme - the "Heart of the Boulevard" - following the principles of the Government's Local Transport Note 1/11.

Brief comments on the concerns about shared space and the adverse impact it can have on disabled pedestrians are included in the comments on policies and can be

expanded if that would be helpful. LTN 1/11 is currently in abeyance following national consultation on the issue.

- Improvements to the “public realm” in Broomhill shopping centre on both Fulwood and Glossop Roads.
- “Gateways” announcing entry to the Boulevard at Fulwood Road (Manchester Road junction), Whitham Road (Weston Park/Children’s Hospital) and Glossop Road (the Mount) - through the use of carriageway narrowing, planting, the siting of public art and other defining features.

We query carriageway narrowing on these busy streets and the need to provide continuous on-carriageway facilities for cyclists.

- Between these gateways, a zone within which:
- the maximum permitted speed limit is 20 mph and the design speed for planning purposes is 15 mph
- loading and unloading from the street is limited to hours of low pedestrian activity
- HGV access is limited to hours of low pedestrian activity
- buses and coaches must meet Minimum NOX emission standard (EURO VI)
- conventional traffic signs and road markings are removed or minimised
- courtesy crossings and/or zebras replace independent signalised crossings

Courtesy crossings simply do not work for disabled pedestrians - and for many others. Zebra crossings do not provide the same level of safety and confidence for disabled pedestrians as signal controlled crossings.

- varied surface materials, changes of direction and/or level and the placement of features such as public art help to influence behaviour
- trees and other planting are used to improve the environment and also influence the behaviour of drivers
- on-street parking is removed with the possible exception of provision for people with disabilities

It is essential that provision for blue badge holders is retained. Removal of other parking provides the opportunity to make more adequate provision for badge holders.

- additional space is provided for pedestrians by widening footways and by shifting the line of the effective carriageway
- footways are raised across side road junctions and turns are tightened in order to give priority to pedestrians

Raised footways are welcome, but areas of blister paving within the footway of the main road on both sides of the side road are essential.

- a full-standard, segregated uphill cycle lane is provided on Whitham Road and Glossop Road

This must be on-carriageway.

- at other locations, effective carriageway widths are sufficiently narrow for cyclists to adopt the “primary position” in a traffic stream

Broomhill Community Hub

Broomhill Community Library is of immense value to the BBEST area. Debates throughout the life of the Forum have emphasised the key role the Library plays in the community. The development of the historic Garden would provide a vital additional green space for a wide range of uses, the development of the building could provide community space which would enable many different activities and events, and Forum meetings have identified a wide range of such events which would make major additions to the life and health of the community. Proposals to for these developments are being taken forward, with the full backing of the Forum, by Broomhill Community Library and Broomhill Community Trust.

These proposals need to address and resolve the access difficulties currently evident at the building.

Banning To Let Signs

There is substantial community support, from all sections, to ban to let signs in the area as has happened in other cities. Major gains would occur in the visual streetscape, crime would probably be reduced, and unnecessary expenditure by landlords would end. The Plan cannot directly ensure this, and SCC needs to act via the Secretary of State. There is very strong pressure from councillors, all residents, the students union, and others for them to do so. BBEST will continue to press hard for the Council to take this step.

PART 3: Sheffield City Council's non-planning response

Parks & Countryside

Ecology:

- A key green corridor appears to have been missed off the BBEST Map 2. There is an active badger sett in Broomhall that use St Marks churchyard, College Street, Lynwood Gardens and Park lane to connect to the Gardens of Broomhall, Hallam collegiate campus and Sunnybank. Whilst this is mostly outside the BBEST area there is no doubt it is a key green corridor used regularly by protected species. Lynwood Gardens is one of the most biodiverse sites in central Sheffield and has been left off the plan entirely.
- Whilst there are aims of maintaining and improving the tree cover and biodiversity there is little that promotes habitat for pollinators. We lack and are in great need of large scale, properly managed wildflower meadows. The creation of species rich, managed, native, wildflower meadows should be included in the BBEST plan as one of the quickest and effective ways of improving biodiversity. Similarly the promotion of species rich green roofs should be a key component encouraged in any new developments.
- As part of the city's flood risk strategy the use of SUDs systems is encouraged in the UDP plan. Any new SUDs systems created should include an element of permanent open water and not soakaways, dry basins or underground storage. Permanent open water is a magnet for wildlife and essential for amphibians. Ponds, SUDs, wildlife scrapes and permanent open water should be promoted in gardens and as part of any new developments, in an environmental green space plan that aims to encourage wildlife and biodiversity.
- Walls and fences are a major barrier to terrestrial wildlife and commonly prevent free movement of wildlife along green corridors. Wildlife is often forced onto roads and killed as a result. Small ground level holes built into boundary walls and fences in key garden blocks, to allow for terrestrial connectivity along wildlife corridors should be promoted and encouraged. Such terrestrial corridors are vital to venerable and protected species such as amphibians, hedgehogs and badgers.

Allotments:

- There are no allotment sites within the area covered by the plan. Allotments are very beneficial, for those who use them (to both physical and mental health), and to the environment (they provide habitats, and also enable local food production). The nearest allotment sites outside of this area have very long waiting lists (Holberry Gardens, Rustlings Road and Hangingwater). It should be a vision to create a quality allotment site within this area.

Woodlands:

- In 2008 officers undertook an extensive study for the Broomhill Central and Nether Edge Area Panel. There are very few woodlands in the area mainly Porter Valley to the south and Rivelin to the north and Ponderosa in the east, but Tree cover is an important issue in these neighbourhoods. The reports and an associated powerpoint presentation are enclosed with these comments for your information.

Green Spaces in general:

- Weston Park/Crookes Valley etc. – the design guidelines cover the importance of linked green spaces. Although these spaces look connected on a map, they are physically separated by a busy road network. Safe crossing points are needed to support good linkages between the green spaces for pedestrians and cyclists. Some of the green spaces are very wooded, which although great for wildlife can deter users, therefore it is important to ensure access routes and boundaries have good lines of sight and feel open; with key routes lit.
- Green spaces close to the hospital – access across busy roads needs to be improved for pedestrians (such as wider pavements close to crossing points)
- The NP covers the importance of retaining and enhancing green corridors for wildlife, however these can also be important green corridors for people; ideally providing safe off-road accessible routes for recreation, commuting etc.

Property Services

There are several Council owned sites that fall within the BBEST NP boundary, our comments on these as the landowner are as follows:

| Address | Comment |
|--|--|
| Crookes Valley Park | No Comments |
| Weston Park | No Comments |
| Parkers Lane car park and adjacent land | Objection to policies which are restrictive of development |
| Spooner Road car park | Objection to policies which are restrictive of development |
| King Edward 7th school - Glossop Road/College street | Objection to policies which are restrictive of development |

Housing Services

Housing Services support the principle of:

- limiting shared housing
- improving the diversity and quality of homes in the area.

Housing to meet local needs - The Strategic Housing Market Assessment 2013 found no evidence of a shortfall of 3 bedroom apartments in the area (SBC6). The Strategic Housing Market 2013 found no evidence of a shortfall of housing in the city for key workers (SBC2). The Plan covers 2 Housing Market Areas City Centre West (covers Broomhill) and South West (covers Fulwood). Local housing need described in the Neighbourhood Plan should reflect the housing types and sizes which are in most short supply for the community. These are:

Family housing for sale -

- Family housing for sale with 2, 3, and 4 bedrooms
- Homes with 2 bedrooms for sale, including Starter Homes or shared ownership tenures. The delivery of smaller homes will make the neighbourhood more accessible to first time buyers, newly forming households and those with lower than average incomes.

Affordable rented properties

- The proportion of social housing in the area is low.
- Strategic Housing Market Assessment 2013 estimated an affordable housing shortfall of 415 properties between 2013 - 2018. The Strategic Housing Market Assessment is currently being refreshed and the affordable housing shortfall is anticipated to have increased due to the low number of new affordable homes built in the area.
- Homes in greatest shortfall in the neighbourhood is one bedroom apartments and two and three bed houses.
- This range of affordable housing provision provides sufficient flexibility to meet housing need of specific groups which might need supported housing, including but not limited to, households with Learning Disabilities or Care Leavers

Older people's independent living housing

- There will be some need for new provision of older people's independent living accommodation in the area. With equity levels being high in this area, the majority of this accommodation should be for sale and shared ownership but some additional affordable rent provision is also required.
- More accessible and wheelchair accessible /adaptable homes should be considered for this area, particularly in light of a growing older population and a higher proportion (than citywide) of disabled households in some parts of the neighbourhood which require a vertical/stair lift to help remain independent
- More housing designed to accessible and wheelchair accessible and adaptable standards is required in all parts of the city to meet current need and the requirements of a growing older population.