Home Builders Federation (HBF) response to the Sheffield Local Plan: Examination in Public Inspector's Matters, Issues and Questions

Matter 6: Green Belt

Issue 1: Is the principle of release of Green Belt land soundly based?

- 6.1 Do the Proposed Sheffield City Region Combined Green Belt Review A Common Approach August 2014 (GB01); Green Belt Review (September 2020) (GB02); and Green Belt Review Addendum (December 2022) (GB03) provide a robust justification for proposed Green Belt boundary changes?
- 6.2 Taking into account paragraph 140 and 141 of the Framework, how has the Council sought to make as much use as possible of suitable brownfield sites and underutilised land and to optimise the density of development through Plan preparation?
- 6.3 When drawing up or reviewing Green Belt boundaries, paragraph 142 of the Framework states that the need to promote sustainable patterns of development should be taken into account. How and where has this been taken into account by the Council?
- 6.4 Having made the decision to review the Green Belt boundaries, how has the Council determined at a strategic level where alterations should be made to meet identified needs? 6.5 How has the potential to off-set the impact of removing land from the Green Belt been considered, for example through compensatory improvements to environmental quality and the accessibility of remaining Green Belt land?

Issue 2: Is the Green Belt Review Methodology soundly based?

- 6.6 What was the methodology used in the Council's Green Belt Review work and was it appropriate?
- 6.7 The Proposed Sheffield City Region Combined Green Belt Review A Common Approach August 2014 (GB01) did not identify specific land parcels. The Green Belt Review (September 2020) (GB02) set out 75 general areas and then identified 204 smaller parcels for assessment. How were these areas defined and what were their boundaries based on?
- 6.8 The Sheffield Landscape Character and Green Belt Capacity Study (April 2018) (GB08) assessed 172 parcels of land, while the Preliminary Landscape Character Assessment (2011)(GB04) considered 16 character areas and the Landscape Character Assessment Addendum (September 2022) (GB07) considered capacity of 34 further areas. Is this generally consistent with the 75 general areas and 204 smaller parcels for assessment in the Green Belt Review (September 2020) (GB02)?
- 6.9 The Green Belt Review (September 2020) (GB02) assessed parcels of land against four of the five Green Belt purposes set out in paragraph 138 of the Framework. How did the Council take these findings into account in preparing the Plan?
- 6.10 Is the Council's general site allocations assessment methodology for sites in the Green Belt soundly based and in line with national guidance?
- 6.11 Have all rejected sites in the Green Belt been fully assessed against relevant Green Belt purposes?
- 6.12 What approach is taken to villages inset in the Green Belt or washed over by Green Belt?

Issue 3: Is the Plan's approach to identifying site allocations in the Green Belt and Green Belt additions and deletions soundly based and in line with national policy?

6.13 Having regard to paragraphs 140 – 143 of the Framework, do exceptional circumstances exist at a strategic level to alter the Green Belt boundary?

- 1. The HBF considers that it is likely that exceptional circumstances exist in Sheffield in relation to the need to alter the Green Belt boundary at a strategic level and notes that the Council are proposing to release a site from the Green Belt at the former Norton Aerodrome. The HBF considers that the Council need to ensure that these exceptional circumstances are set out clearly within the Plan and its evidence base, including how they are making as much use as possible of suitable brownfield sites; optimising density of development and be how their decision has been informed by discussions with neighbouring authorities.
- 6.14 Is Policy SP1 h) which sets out the need for protection for existing Green Belt boundaries around existing built-up areas, with one strategic land release on a predominantly brownfield site at the former Norton Aerodrome for residential use, consistent with the Council's evidence base on Green Belt, with particular reference to the additions to and deletions of Green Belt land which are identified on the Policies Map? What boundary changes would result from the adoption of the Plan and are they clearly and unambiguously set out in the Plan?
- 2. The HBF considers that there is limited information within the Plan in relation to additions and deletions to the Green Belt. Policy SP1 sets out that the Council will look to protect existing Green Belt boundaries around existing built-up areas, with one strategic land release on a predominantly brownfield site at the former Norton Aerodrome (for residential use). But there is limited information in to the exceptional circumstances that were considered, or as to how this release was determined to be appropriate but others were not.
- 6.15 Have the exceptional circumstances for all additions and deletions of Green Belt land been fully evidenced and justified as paragraph 140 of the Framework requires? Do exceptional circumstances exist to support these changes to the Green Belt boundary?

Each proposed addition to and deletion of Green Belt land should be individually evidenced and justified in the Council's hearing statement, with reference to the above questions and relevant elements of the evidence base.

- 3. The HBF considers that this is a question for the Council.
- 6.16 What would the impact of the proposed boundary changes at Site SS17 Former Norton Aerodrome be on the purposes of including land within the Green Belt? Do the exceptional circumstances exist necessary to justify this alteration to the Green Belt boundary?
- 4. The HBF considers that this is a question for the Council.

Issue 4: Is Policy GS2 justified, effective, and in line with national policy?
6.17 Is Policy GS2 justified, effective and consistent with national policy?
6.18 What is the reason for the definition of 'not materially larger' and 'disproportionate addition' as referred to in Policy GS2 b) and c)?
6.19 Is Policy GS2 d) clear and unambiguous as to what it permits?

6.20 Are the substantially developed road frontages at Chapeltown Road, Whiteley Wood Road and Long Line clearly defined?

6.21 Is it necessary to define inappropriate?