

From: [REDACTED]
To: [REDACTED]
Cc:
Subject: RE: Publication (Pre-submission) Draft Sheffield Plan 2022
Date: 17 February 2023 11:44:58
Attachments: [image001.png](#)
[LPSY001 Local Plan TM008 FINAL iSSUED.pdf](#)
[Sheffield_17022023.docx](#)

Good morning Simon, hope all is well with yourself and the team.
Please find attached the formal response to your consultation regarding the Pre-submission Draft Sheffield Plan. I have also attached here (for the benefit of the Council primarily), a Technical Memorandum which provides a detailed review of the Pre-Submission Draft Sheffield Plan 2022.

As our work continues with Gemma and the team, we will no doubt start to be able to progress towards an agreed IDP [2] and a Statement of Common Ground can then be drafted by your team in readiness for the EiP. We look forward to continuing our joint working, and will no doubt speak soon.

As always, my kindest ongoing regards to all

Simon D. Jones Esq.

Regional Strategic Planning Manager

North Yorkshire, West Yorkshire, South Yorkshire & Lincolnshire



(Yorkshire & North East Team)

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I am a hybrid worker and predominantly based from a home office. This means that whilst I am always available via email and phone, there could be occasional pressures on the technology which supports this - hence there could be periods of intermittent contact without notice.

[a]

From: SheffieldPlan <sheffieldplan@sheffield.gov.uk>

Sent: 09 January 2023 10:57

Subject: BST20159 Publication (Pre-submission) Draft Sheffield Plan 2022

Dear Statutory Consultee/Statutory Consultee's Agent

Publication (Pre-submission) Draft Sheffield Plan 2022

Consultation pursuant to Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

We are preparing a new local plan, which, when adopted, is expected to be called “the Sheffield Plan”. Following public consultation on ‘Issues and Options’ in 2020, the Publication (Pre-submission) Draft Sheffield Plan is now ready for consultation.

The Publication Draft Plan represents the Council’s formal proposals on how the city should grow and develop over the period to 2039. It covers the whole of Sheffield except for the part of the city that is in the Peak District National Park.

We are asking for comments and feedback on whether the Plan has been prepared in accordance with legal and procedural requirements, and whether it is sound. Plans are sound if they are:

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d. **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework and other statements of national planning policy, where relevant.

The statutory public consultation is available for a 6-week period from Monday 9 January to Monday 20 February 2023. A full **Statement of the Representations Procedure** is attached to this email.

You can read the Publication Draft Sheffield Plan on the [Consultation Portal](#) on the Council’s website. You can also view the other supporting documents that we will be seeking comments on, together with other background documents that you may find helpful to refer to.

To make your comments visit the Consultation Portal from 9 January. Please make your comments no later than 11.59 pm on Monday 20 February.

Details of all the consultation events are also available on the Consultation Portal (which can also be accessed from the Council’s website).

Why we are writing to you

We are writing to you as you as a statutory consultee or because you have previously expressed an interest in being kept informed about the new local plan. Consequently, you are on our mailing list of contacts for this group and will have signed up to our ‘terms and conditions’.

The data you give us

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All representations are required to be made public and will be published on the Council’s website following this consultation. Your representations and name/name of your organisation will be published, but other personal information will remain confidential. Your data and comments will be shared with other relevant agencies involved in the preparation of the local plan, including the Planning Inspectorate. Anonymous responses will not be considered. Your personal data will be held and processed in accordance with the Council’s Privacy Notice which can be viewed at: <https://www.sheffield.gov.uk/utilities/footer->

[links/privacy-notice](#)

How to contact us

If you would have difficulty accessing any of the consultation documents via our website or accessing the Consultation Portal, or you need any further advice or information, please contact us at sheffieldplan@sheffield.gov.uk. You can call us on 0114 2735274. Please also email us at the above address if you no longer want us to contact you about the Sheffield Plan.

Yours faithfully



Simon Vincent
Strategic Planning Service Manager
Planning Service
Sheffield City Council

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Pre-Submission Draft Sheffield Plan 2022 Consultation

Prepared for:	Simon Jones
Prepared by:	Emily Boazman/Clare Pennells
Date:	10 th February 2023
Case Reference:	LPSYSheffield
Document Reference:	Local Plan TM008
Reviewed/approved by:	Clare Pennells/Richard Edwards

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Overview

National Highways has commissioned the Jacobs Systra Joint Venture [JSJV] to review the draft Sheffield Plan. The Sheffield Plan represents proposals for how Sheffield City Council [SCC] believes Sheffield should develop in the period up to 2039. The Plan has been prepared in accordance with the Planning and Compulsory Purchase Act (2004) (as amended) and Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

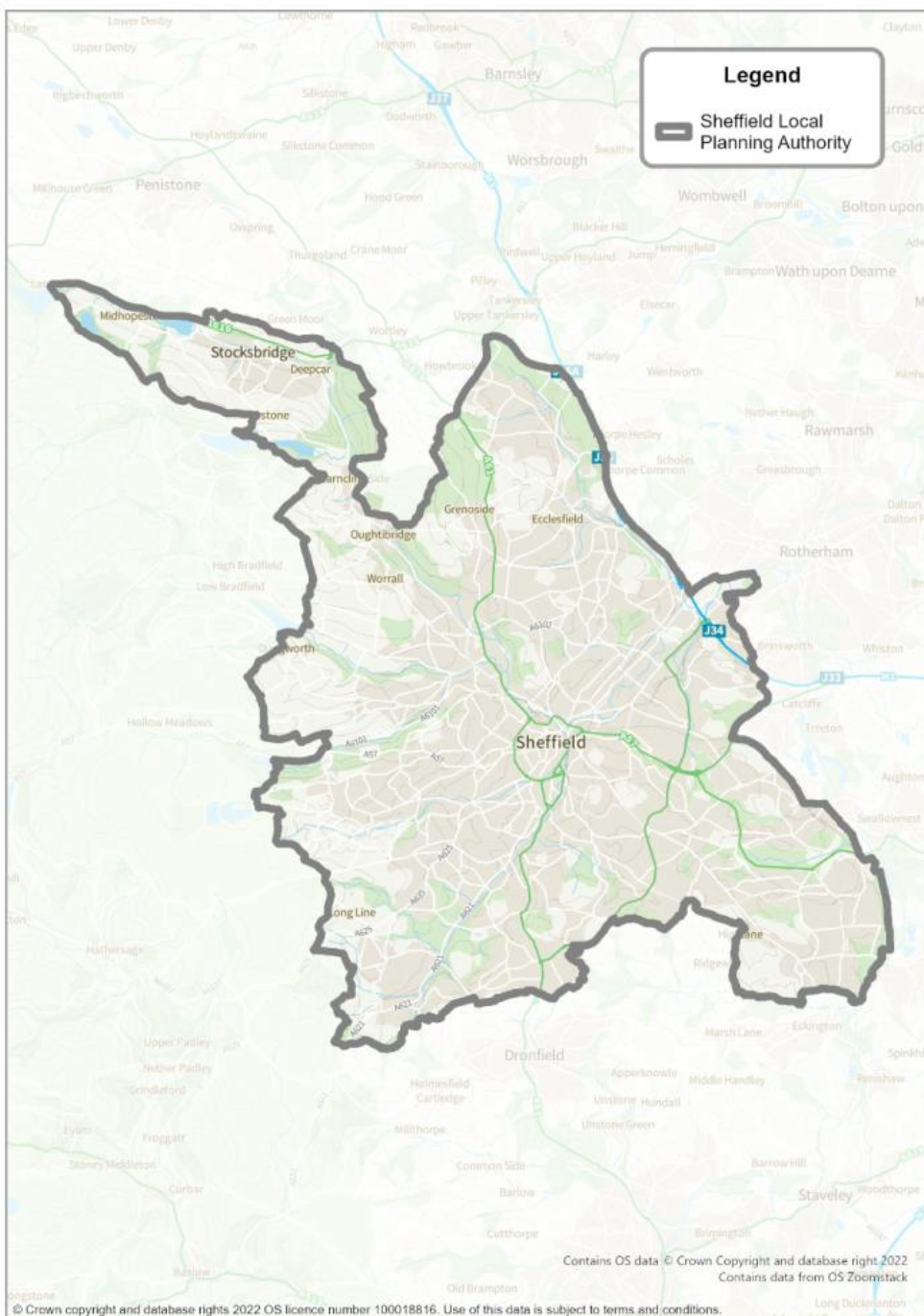
The following documents have been reviewed as part of the draft Sheffield Plan:

- Part 1: Vision, Spatial Strategy, Sub-Area Policies and Site Allocations – dated December 2022
- Part 2: Development Management Policies and implementation – dated December 2022
- Annex A: Site Allocations – dated December 2022
- Annex B: Parking Guidelines – dated December 2022
- Key Diagram
- Policies Map
- Glossary – dated December 2022

JSJV has also reviewed other relevant supporting documents including:

- Draft Infrastructure Delivery Plan Part 1: Infrastructure Needs Assessment – dated January 2023
- Whole Plan Viability Assessment – dated September 2022

The Sheffield Plan covers the whole of Sheffield, with exception to the part lying in the Peak District National Park. The geographical area covered by the Sheffield Plan is shown in Map 1 of the Part 1: Vision, Spatial Strategy, Sub-Area Policies and Site Allocations document, which is replicated below for ease of cross referencing.



(Source: Map 1, Draft Sheffield Plan 2022 Part 1: Vision, Spatial Strategy, Sub-Area Policies and Site Allocations – dated December 2022)

This Technical Memorandum [TM] provides a summary of the review that has been undertaken of the documents listed above and where these are relevant to National Highways, comments have been provided below.

The Strategic Road Network [SRN] (for which National Highways is the highway authority with a principal purpose of enable safe, reliable, predictable, efficient, journeys for people and goods in England) in the area includes the M1 Junctions 30 to 36 and the A616 between the M1 and its junction with the A628.

In considering the relationship between the Plan and the SRN, the primary consideration of National Highways is the recently released (23rd December 2022) [Circular 01/2022](#) – ‘Strategic road network and the delivery of sustainable

development'. Circular 01/2022 sets out the way in which National Highways will engage with the development industry, public bodies and communities to assist the delivery of sustainable development and has been quoted throughout this TM, where appropriate and relevant to the Plan documents.

Progress to Date

National Highways is committed to working collaboratively with SCC in order to understand how the Local Plan will impact upon the SRN and in identifying necessary infrastructure to support the Local Plan. National Highways has been working with SCC and their consultants for a number of years, in order to understand how the allocations within the Local Plan will impact the SRN and how this can be mitigated. Although the traffic impact of the Local Plan upon the SRN is yet to be fully understood, traffic modelling exercises are currently being undertaken by SCC's consultants in consultation with National Highways and their consultants.

National Highways will expect any significant traffic impact shown in the traffic modelling exercises, to be mitigated through schemes which will need to be identified within the Infrastructure Delivery Plan [IDP]. National Highways will also expect the IDP to provide an outline of how these schemes will be funded and secured, identifying whether they are likely to be based on developer contributions or secured through other funding streams.

National Highways will continue the collaborative work with SCC and their consultants, with a view to agreements being reached in relation to the location, scale of impact and mitigation required at the SRN. It is anticipated that these agreements will be documented through a Statement of Common Ground [SoCG], in advance of the forthcoming Local Plan's Examination in Public [EIP].

Part 1: Vision, Spatial Strategy, Sub-Area Policies and Site Allocations

Foreword: A new Vision for Sheffield

The foreword states that a key priority for this Council is delivering secure, connected, respected neighbourhoods – providing affordable homes in the right locations.

Visions, Aims and Objectives

The Vision is that *“by 2039, Sheffield will be an economically stronger, fairer, more inclusive and sustainable city. It will be playing a nationally significant economic role at the heart of its region, with thriving neighbourhoods and communities, and have a distinct urban and rural identity.”*

There are eight aims that flow from the vision and there are significant connections and overlaps between the aims. The aims which are of most relevance to National Highways are stated below:

Aim 6: A connected city, which includes the specific objectives:

- To create an integrated and sustainable transport network that promotes and enables walking, cycling and public transport, in order to reduce congestion, support district centres, improve air quality and safety and enable healthier lifestyles;

- To develop excellent connections with the rest of the Combined Authority area, and national and international transport networks, including developing faster rail connections; between Sheffield and Leeds and Manchester, as well as improvements to Sheffield Midland Station;
- To locate new development where it minimises the distances that people and goods need to travel, by mixing land uses to increase opportunities for people to make single journeys that serve several purposes; and
- To create a digitally connected city with comprehensive broadband coverage, including in rural areas and to make efficient use of telecommunications.

National Highways welcome the vision, aims and objectives outlined in the Sheffield Plan and supports development of connections of sustainable transport.

Growth Plan and Spatial Strategy

Paragraph 3.5 of the Part 1: Vision, Spatial Strategy, Sub-Area Policies and Site Allocations document lists a number of priorities where growth should be located and those of most relevance to National Highways include:

- Match opportunity and need by concentrating new development in locations that are, or could be, well served by tram/rail network or key bus corridors, as well as other essential infrastructure;
- Support existing public transport services and enable the provision of new infrastructure that enables active travel; and
- Maximise accessibility by directing higher density developments and those that generate significant numbers of trips to the City Centre, District Centres and other locations close to railway stations, Supertram stops and high frequency bus routes.

National Highways support these priorities as they support sustainable travel and encourage future development in sustainable locations.

The overall growth plan for Sheffield is defined in Policy SP1, which states '*The Sheffield Plan will realise the vision for 'an economically stronger, fairer, more inclusive and sustainable city' by promoting growth that delivers the homes, jobs, employment floorspace, infrastructure and community facilities to meet Sheffield's identified needs.*' The policy also outlines what the Sheffield Plan will deliver in terms of quantum of housing and employment areas, as set out in the extract below.

The Sheffield Plan will deliver:

- a) 35,530 new homes by 2039 (2,090 homes per annum from 2022 to 2039) (see Policy H1)
- b) 12.9 hectares of employment land per year, which includes 2.9 hectares for office development; and 10 hectares for industrial development (see **Policies EC1 to EC7**).
- c) 372 Site Allocations¹⁸ - including 297 for housing, 52 for economic development 19 mixed use and 1 for leisure and recreation which provide a deliverable and developable supply to meet needs (see **Policy SP1**).

(Extracted from the Consultation Draft Sheffield Local Plan, dated December 2022, Policy SP1)

National Highways will continue to work collaboratively with SCC and their consultants in order to understand the impact of the development quantum listed in Policy SP1 on

the SRN. However, it is worth highlighting that Paragraph 12 of Circular 01/2022 states that new development should be facilitating a reduction in the need to travel by private car and focused on locations that are or can be made sustainable. Developments that are located in the right places and served by the right sustainable infrastructure delivered alongside or ahead of occupancy must be a key consideration when planning for growth in all local authority areas.

Topic Policies

Enabling Sustainable Travel

Paragraph 5.10 of the Part 1: Vision, Spatial Strategy, Sub-Area Policies and Site Allocations document states that Sheffield's growth ambitions must be supported by high quality transport infrastructure providing inclusive and sustainable transport connectivity. The Council's aim of achieving net zero carbon by 2030 will require significant modal shift, as well as reducing the need to travel and supporting the move to zero emission vehicles. It is recognised that whilst the covid pandemic has re-shaped how people behave and travel, there are still uncertainties on the longer-term impacts on travel demand. However, new development will still usually generate some new trips and it is important that this demand is managed effectively through the planning policies. The introduction of Gear Change and the National Bus Strategy has placed a requirement on Local Authorities to proactively support sustainable and active forms of travel for all journey purposes.

Policy T1- Enabling Sustainable Travel includes the priority projects and initiatives at a national and regional level, city region level and a city level.

National Highways support projects which encourage sustainable transport and provide connections to and around Sheffield.

Appendix 1: List of Site Allocations

Appendix 1 lists the sites for each of the Plan's sub-areas that are allocated and outlined on the Policies Map.

National Highways would welcome early engagement and involvement in the future planning application process for development at any of the allocation sites. Circular 01/2022 acknowledges that where developments are located, how they are designed and how well delivery and public transport services are integrated has a huge impact on people's mode of travel for short journeys. National Highways therefore expect that developments will only be promoted at locations that are or can be made sustainable with appropriate internal infrastructure to encourage sustainable travel.

Part 2: Development Management Policies and Implementation

This document forms Part 2 of the Draft Sheffield Plan and it includes:

- The development management policies; and
- Information on implementation of the Sheffield Plan

Comments on the sections of the Part 2 document which are of most relevance to National Highways are made in the following sections of this TM.

An Environmentally Sustainable City – Responding to the Climate Emergency

Managing Air Quality

Paragraph 3.18 of the Part 2 document states that Sheffield's Transport Strategy and Clean Air Strategy both put emphasis on modal shift away from the private car towards less polluting modes of transport. Paragraph 3.19 of the Part 2 document mentions that new developments can result in a reduction in air quality, usually as a result of increased traffic generation. It is important that impacts are mitigated and where possible provisions are made to improve air quality. The plan mentions that this could include installing zero and ultra-low emissions vehicle refuelling infrastructure, providing bicycle parking, adopting an appropriate Travel Plan [TP] or supporting a local car club.

National Highways support this emphasis on modal shift away from the private car and the Circular 01/2022 states that the SRN has an essential role in supporting the decarbonising transport, including the installation of charge points for electric vehicles and necessary behavioural change to walking, wheeling, cycling and public transport for those who can take it.

Thriving Neighbourhoods and Communities

Paragraph 4.2 of the Part 2 document states that where new homes are being built, people should be able to walk, cycle or use public transport to access shops and facilities that meet their daily needs. This principle is welcomed by National Highways.

Strategic Housing Sites

Sites which have at least 200 new homes are referred to as 'Strategic Housing Sites' and normally require the provision of new infrastructure to make a sustainable development. The strategic housing sites have been selected by SCC as appropriate locations based on factors such as their suitability, land ownership and economic viability. The Policy NC1 'Principles guiding the development of strategic housing sites' lists what the development should have. This includes that it should be a walkable neighbourhood with an efficient highway network that incorporates key transport corridors and movement networks dedicated to public transport, cycling and walking which enables easy access to key destinations. These principles are supported by National Highways.

Creating Sustainable Communities

Paragraph 4.37 of the Part 2 document discusses the idea of 20 minute neighbourhoods across the city. The idea is that most of peoples' daily needs can be met within a 10-minute walk or cycle ride with the objective for residents to be able to access places and services without relying on a car. This has multiple benefits including boosting local economies, improving people's health and wellbeing, increasing social connections in communities and tackling climate change.

Policy NC11 – Access to Key local services and community facilities in new residential developments.

"This policy states that residential developments comprising 10 or more new homes should be within:

- a) *A 10-minute walk (800 metres) of a convenience shop and at least 3 other types of community facilities or important local services; and*
- b) *A 5 minute walk (400 metres) of a bus route providing minimum service frequency standard or a 10 minute walk of a tram stop or a railway station; and*

- c) 2 miles (3.2 kilometres) of a primary health care centre and primary school; and
- d) 3 miles (4.8 kilometres) of a secondary school

Developments that do not meet the criteria will be expected to provide mitigation to ensure that new residents are able to access appropriate services and facilities within a reasonable distance of their homes.”

The minimum service frequency standard referred to in point b) above is defined in the Glossary section of the Part 2 document. This sets out the following:

‘Minimum service frequency standard (for buses) equates to three buses or trams per hour in each direction between 7.30am and 6pm (Monday to Friday). A lower service frequency may be accepted, within reason, in rural areas.’

The above minimum service frequency standard would be welcomed by National Highways; however, SCC will need to ensure it is sustainable. National Highways supports the creation of sustainable development, with Circular 01/2022 stating that successful development depends upon a movement network that makes connections to destinations, places and communities.

A Strong Economy

The Advanced Manufacturing Innovation District (AMID)

It is stated that the AMID is central to the city and the region’s economic strategy and is recognised as the region’s greatest opportunity to deliver transformational economic development. The policy related to development in the AMID states:

Policy EC1: Development in the Advanced Manufacturing Innovation District (AMID)

“Proposals for development on key sites within the AMID will be supported and encouraged where they reflect the innovation-focussed economic development objectives relating to the delivery of advanced manufacturing, innovation in advanced health and wellbeing or energy research focussed on net-zero carbon processes.”

National Highways has worked with SCC previously in relation to development in AMID and welcomes early involvement in the planning application process of any forthcoming developments in the AMID, to further understand the impact these developments may have on the SRN, and whether their traffic impact will need to be mitigated.

Employment Zones

Paragraphs 5.12 to 5.16 of the Part 2 document outline development in the city centre, general employment and industrial zones.

National Highways is currently working alongside SCC and their consultants to understand the traffic impact associated with the development allocations located in the employment zones and whether this needs to be mitigated at the SRN. National Highways welcome continued engagement in all stages of future planning applications within the employment zones that have the potential to generate traffic at the SRN.

A Vibrant City Centre and A Connected City

Paragraph 6.1 of the Part 2 document outlines the vision for a well-connected city centre that supports business, employment, residential and cultural opportunities. Complementing this, Section 7 of the Part 2 document outlines that excellent, sustainable transport connectivity will be essential in supporting a growing city and

ensuring that Sheffield achieves its air quality and net-zero goals. This helps Sheffield to be an inclusive, healthy city where everyone can access the jobs, services and leisure opportunities that the city offers. New developments will be connected by sustainable active travel networks and public transport. National Highways welcomes encouraging sustainable travel to new developments.

Policy CO1: Development and Trip Generation

Policy CO1 states that *“new development should support the delivery of net zero transport carbon emissions. Proposals should prioritise travel by public transport, cycling and walking and incorporate inclusive infrastructure which provides connections to and within the development.”*

It sets out what development proposals will be expected to include as a proportionate package of measures. This includes minimising the number of trips (by all modes), maximising opportunities for cycling, walking and public transport and minimise and mitigating the impact of the development on the transport network. These principles are fully supported by National Highways.

Significant trip generating developments, as outlined in Table 3 of the Part 2 document, will require a TP. Table 3 sets out that a TP is required based on exceeding one of three thresholds which are based on trip generation, number of employees or gross floor space. The table generally suggests that developments generating more than 30 vehicle movements in any 1 hour period, will require a TP. This principle is endorsed by National Highways.

Paragraphs 7.7 to 7.11 of the Part 2 document provides information on parking provision in new developments and states that the Sheffield Parking Strategy was published in February 2018, which sets out the ways in which parking will be managed in order to achieve the Council’s wider aims.

Policy CO2 provides further detail on parking provision in new development. National Highways has noted that SCC’s parking policy seeks to minimise parking provision for residential and employment uses in the city centre. This principle will need to feed into any traffic modelling assumptions undertaken by SCC’s consultants for the city centre.

However, Point a) of Policy CO2 identifies that residential development in the Central Sub-Area should be car-free or provide 1 space per dwelling where a clear need can be demonstrated. This contradicts the parking details in Annex B (Parking Guidelines) of the Local Plan which suggests that residential development in the Central area should be car free or a maximum of 1 space per 10 dwellings, where it can be justified. This contradiction should be clarified by SCC, as whichever parking policy is implemented could impact on the traffic flows that have been assumed in SCC’s traffic modelling of the Local Plan.

National Highways supports new developments being connected by active transport networks to minimise the associated traffic impacts of these developments. Early engagement with National Highways in relation to future development proposals is welcomed so that the likely traffic impact can be understood and minimised at the SRN.

Implementation

Development management

Paragraph 11.7 of the Part 2 document states that a range of assessments, evidence, statements and plans may also be needed depending on the scale and type of development proposed. The main documents of interest to National Highways include

the Transport Assessment [TA] and TP. When a development is likely to generate a significant amount of traffic at the SRN, National Highways welcomes early involvement at all stages of the planning application, including any scoping of the TA and TP.

Annex A: Site Allocations Schedule

Annex A of the draft Consultation Plan contains details and conditions on development of all site allocations made in the Sheffield Plan.

National Highways is currently working with SCC and their consultants, in order to understand the impact of these site allocations on the SRN and to determine if mitigation is required to cater for the site allocations' development traffic at the SRN. Should mitigation be necessary, National Highways will expect the IDP to identify the location and likely scale of the necessary mitigations, along with an identification of how the mitigations will be funded.

Annex B: Parking Guidelines

Annex B of the draft Consultation Plan contains details in relation to SCC's parking guidelines. The parking standards within this Annex appear to be in line with discussions held between SCC (and their consultants) and National Highways (and their consultants). These are welcomed by National Highways, particularly cycle parking to encourage the use of sustainable transport modes and the restrictions on parking for new development in the city centre.

However, as noted in an earlier section of this TM, the information in Policy CO2 appears to differ from Annex B with regards to the allowance for residential dwellings. This matter should be clarified by SCC.

Ongoing work between SCC (and their consultants) and National Highways suggests that the parking policy will look to inform the potential impacts at future developments. Therefore, it will be key for future developments to be delivered in line with the parking guidelines.

Key Diagram and Sheffield Plan Policies Map

The Key Diagram and the Sheffield Plan Policies Map identify the location of the proposed site allocations. These are currently being considered in the collaborative work being undertaken between SCC and National Highways (and their consultants). The location and scale of both the housing and employment sites is being considered in order to identify the cumulative traffic impact of the site allocations. Where there is a significant traffic impact at the SRN, National Highways will work with SCC to ensure that this is mitigated appropriately.

It is noted that the strategic housing sites located outside of the central area are all located next to the SRN. Early engagement and involvement in these sites (as they move through the planning process) is welcomed by National Highways, due to the potential impact they may have on the SRN. It is also noticed that these sites, particularly those to the north of Sheffield towards Barnsley are not situated on the Supertram network or near a railway station or a transport opportunity. SCC will need to give consideration to whether the public transport services around the site allocations, meet the criteria set out for the minimum service frequency standard within Policy NC11.

Infrastructure Delivery Plan [IDP] – Part 1: Infrastructure Needs Assessment

The IDP Part 1: Infrastructure Needs Assessment is intended to support the finalisation of the spatial strategy for the new Plan by setting out the baseline context of infrastructure provision across the city as a whole. The IDP considers 27 infrastructure types across 6 infrastructure themes – transport, education, health care and emergency services, green infrastructure, community facilities and utilities. The IDP is considered by National Highways as a key document, as it will need to identify whether the Local Plan requires any mitigation schemes to be delivered at the SRN in order to accommodate the cumulative traffic impact of the site allocations. National Highways will expect the IDP to identify the location and scale of any required SRN mitigations and how this will be funded and secured.

There are a number of infrastructure types where implications for future growth have been identified within the IDP. One of these is transport and the report states that Sheffield has been successful at securing funding for a range of connectivity improvements across the city and a variety of public and active travel opportunities have been identified.

The IDP also states that Initial transport modelling has indicated that planned growth proposed in the Plan will result in ‘zones of impact’ in various parts of the highway network including the Inner Ring Road, A630 Sheffield Parkway, A6135, A61/A6102, A6109, A6178. ‘Zones of impact’ will also arise on the M1 between Junction 33 and Junction 35 and at various individual junctions as well. The IDP states that further refinements of this modelling will take place to ensure that the direct and cumulative impacts of the Plan are fully understood and any necessary mitigation measures will be set out in the Part 2 IDP’s Infrastructure Delivery Schedule. National Highways welcomes the acknowledgement that the Plan is likely to impact on the M1 between Junctions 33 and 35 as well as various individual junctions. The impact at all SRN junctions within the vicinity of Sheffield is yet to be fully understood by National Highways. However, National Highways is currently working with SCC and their consultants to understand the location and scale of these impacts and how they can be mitigated. Consequently, the further refinements of the modelling and including mitigation measures within the forthcoming Part 2 IDP document is fully supported by National Highways.

Future Infrastructure Needs

Transport

SCC’s objective is to create a modern, integrated transport network that delivers greater accessibility and connectivity for all. The National Planning Policy requires the Council to promote and prioritise sustainable transport. To do this, Councils should minimise the impacts of development on the existing transport network and maximise both existing and proposed transport infrastructure.

The NPPF encourages the Council to actively manage patterns of growth, with significant development to be focused on locations which are (or can be made) sustainable, through limiting the need to travel and offering a genuine choice of transport modes. The government has put a stronger focus on decarbonisation of the transport network as a response to the climate emergency. The South Yorkshire Mayoral Combined Authority [SYMCA] has identified a series of transport challenges, whilst acknowledging that the city region’s transport system and supporting

infrastructure is not fit for the 21st century. SYMCA identify that prioritising the provision of active travel and public transport in economic centres is vital to achieving inclusive and sustainable growth that will also contribute towards aspirations for net zero carbon.

SCC has produced the SCC Transport Strategy (2019) and has submitted a number of business cases to the Government. A number of key challenges that require action have been stated in Page 26 of the IDP.

Highway Challenges

The Sheffield Transport Strategy sets out that without intervention the impact of general traffic growth on the current transport network would result in increases in traffic and journey times at the Inner Ring Road, longer queues on radial routes into the city, increases in delays in the City Centre, increasing delays for buses.

The SCC Transport Strategy states that the analysis of the current highway network that impacts the SRN indicates that:

- There is significant congestion and delays at key junctions and arterial/radial routes into the City centre of Sheffield. Delays occur at both the AM and PM peak, particularly along routes from the Upper Don Valley and Lower Don Valley into the City Centre/Central Sub-Area;
- Known capacity constraints on the SRN, particularly at Junction 33 and 34 on the M1 and on the A616. This reduces connectivity to and from the city centre and the AMID and acts as a constraint on the growth potential of the city centre/central sub-area and parts of the Lower Don Valley/ East Sheffield sub-area; and
- Cumulative impact of development sites must be understood – particularly the cumulative impacts on the Major Road Network [MRN] and SRN and joined up solutions for funding and delivery must be identified.

The Council has commissioned new transport modelling work to support the preparation of the Sheffield Plan. The modelling provides the Council with a new evidence base and it represents an update to the evidence used to inform the SCC Transport Strategy. Page 28 of the IDP provides further details regarding the transport model, including the baseline traffic flows and the future years. The high level outputs from the first run of the model have indicated several 'zones of impact' and those on the SRN include:

- Increases in traffic flows on the M1 between Junctions 33 and Junctions 35; and
- Junction capacity impacts on the M1 at Junction 31, Junction 33 and Junction 34 South and North.

Whilst it is appreciated that SCC and their consultants are currently working in consultation with National Highways, it is yet to be ascertained whether the traffic impact of the site allocations will be in line with the scale presented within Part 1 of the IDP and also whether the impact will be limited to the aforementioned SRN junctions or whether other individual junctions will be impacted upon. However, National Highways is committed to continue the collaborative working approach and will look to agree the likely traffic impact, necessary interventions and funding streams through the forthcoming SoCG and IDP Part 2.

Rail, Public Transport & Active Travel Challenges

Pages 29 and 30 of the IDP Part 1 sets out the challenges for rail, public transport and active travel. The sustainable transport system suffers from uncertainty in future scheme delivery, constraints to grow the level of provision, a lack of connectivity to other sustainable infrastructure and some of the areas of planned growth, along with general attractiveness for using these modes.

Implications of future planned growth and proposed infrastructure investment

Section 4.1.2 of the IDP Part 1 details a number of opportunities considering the planned growth outlined in the Plan. Highway opportunities have been proposed and include:

- The initial high level modelling outputs have indicated ‘zones of impacts’ and the next stage of work will be done in conjunction with key stakeholders which includes National Highways.
- Once the outputs from the modelling have been finalised and agreed, potential mitigation measures and infrastructure interventions will be drafted. The need for interventions will be subject to further analysis to determine the location and types of schemes required.
- Future development proposals will be expected to include a package of measures that will –
 - Minimise the number of trips that users of the development need to make and reduce car reliance.
 - Minimise and mitigate the impact of the development on the transport network.

The details bulleted above are fully welcomed by National Highways and National Highways is committed to continued involvement in discussions with SCC (and their consultants) regarding the identified future workstreams. National Highways is keen to work with SCC in order to ensure SRN mitigations can be put in place where these are required and that they are secured through the IDP Part 2.

Summary and Conclusions

JSJV has reviewed a number of documents associated with the draft Sheffield Plan 2022 on behalf of National Highways.

National Highways welcomes this consultation and will continue to proactively engage in the preparation of the Plan. National Highways are continuing to engage with Sheffield City Council (and their consultants) in relation to the impact of the proposed allocations on the SRN and whether appropriate mitigations (where necessary) can be delivered and secured through the Sheffield IDP Part 2.

On the basis of this review, the recommendation to National Highways in relation to this Local Plan consultation is:

Plan Preparation – Comments made regarding the Sheffield Draft Plan 2022.



Our ref: LPSYSheffield
Your ref: N/A

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17 February 2023

FAO: Simon Vincent

Dear Simon,

**Publication (Pre-submission) Draft Sheffield Plan 2022
Consultation pursuant to Regulation 19 of the Town and Country Planning (Local
Planning) (England) Regulations 2012**

National Highways welcomes the opportunity to comment on the Pre-Submission Draft of the Sheffield Plan 2022. As you are aware, National Highways is committed to working collaboratively with Sheffield City Council [SCC], in order to help the Council, understand how the Local Plan will impact upon the Strategic Road Network [SRN] and in identifying necessary infrastructure and mitigation, where necessary, to be provided to support your Local Plan.

This letter provides a summary of assessment of the Local Plan impact you have provided to date, along with comments on specific sections or policies set out within the Pre-submission draft Sheffield Plan 2022 document.

The SRN within and surrounding Sheffield

The SRN within and surrounding the Sheffield area comprises of the M1 and the A616. Through recent discussions between National Highways and SCC, it has been agreed that National Highways will need to understand the impact of the Local Plan allocations upon the M1 between Junctions 30 and 36 and also on the A616 between the M1 and the A628.

Ongoing Collaboration

National Highways has been working with SCC and their consultants for a number of years, in order to understand how the allocations within the Local Plan will impact on the SRN and how this can be mitigated.

Although the traffic impact of the Local Plan upon the SRN is yet to be fully identified, traffic modelling exercises are currently being undertaken by SCC’s consultants in consultation with National Highways.

National Highways will expect any traffic impact shown in the traffic modelling exercises, to be mitigated through schemes which will need to be identified within the Infrastructure Delivery Plan [IDP]. National Highways will also expect the IDP to provide an outline of how these schemes will be funded and secured, identifying whether they are likely to be based on developer contributions or secured through other funding streams available to the Council.

National Highways will continue the collaborative work with SCC and their consultants, with a view to agreements being reached in relation to the location, scale of impact and mitigation required at the SRN. These agreements will also need to be documented through a Statement of Common Ground [SoCG] between National Highways and SCC, in advance of the forthcoming Local Plan’s Examination in Public [EIP], a draft of which should be produced by SCC.

Pre Submission Draft Comments

A ‘Technical Memorandum’ has been prepared and attached which provides a detailed review, in response to the Pre-Submission Draft consultation. Below, National Highways make the following comments (in Table 1) in relation to policies or sections of the Pre-Submission Draft documents:

Table 1 – National Highways’ Comments on the Pre Submission Draft Sheffield Plan 2022

Policy / Paragraph Number / Appendix	Document	National Highways’ Comments
Policy SP1 – Overall Growth Plan	Part 1: Vision, Spatial Strategy, Sub-Area Policies and Site Allocations (December 2022)	National Highways will continue to work collaboratively with SCC and their consultants in order to understand the impact of the development quantum (listed in Policy SP1) on the SRN. However, it is worth highlighting that Paragraph 12 of Circular 01/2022 states that new development should be facilitating a reduction in the need to travel by private car and focused on locations that are or can be made sustainable.

Policy / Paragraph Number / Appendix	Document	National Highways' Comments
		<p>Developments that are located in the right places and served by the right sustainable infrastructure delivered alongside or ahead of occupancy, must be a key consideration when planning for growth in all local authority areas.</p>
<p>Annex A – Site Allocations Schedule (December 2022)</p>	<p>Annex A – Site Allocations Schedule (December 2022)</p>	<p>Although the list of site allocations will be considered at a high level through the Local Plan traffic modelling, National Highways would welcome early engagement and involvement in the future planning application process for development at any of the allocation sites. Circular 01/2022 acknowledges that where developments are located, how they are designed and how well delivery and public transport services are integrated has a huge impact on people's mode of travel for short journeys. National Highways therefore expect that developments will only be promoted at locations that are or can be made sustainable with appropriate infrastructure to encourage sustainable travel.</p> <p>National Highways is currently working with SCC and their consultants, in order to understand the impact of the site allocations on the SRN and to determine if mitigation is required to cater for the site allocations' development traffic at the SRN. Should mitigation be necessary, National Highways will expect the IDP to identify the location and likely scale of the necessary mitigations, along with an identification of how the mitigations will be funded.</p>

Policy / Paragraph Number / Appendix	Document	National Highways' Comments
Paragraphs 3.18 to 3.19	Part 2: Development Management Policies and Implementation (December 2022)	National Highways supports the emphasis on modal shift away from the private car and the Circular 01/2022 states that the SRN has an essential role in supporting the decarbonising transport, including the installation of charge points for electric vehicles and necessary behavioural change to walking, wheeling, cycling and public transport for those who can take it.
Policy NC11 – Access to Key local services and community facilities in new residential developments	Part 2: Development Management Policies and Implementation (December 2022)	The minimum service frequency standard referred to in point b) of Policy NC11 is defined in the Glossary section of the Part 2 document. The minimum service frequency standard (3 per hour) would be welcomed by National Highways; however, SCC will need to ensure it can be sustained by developers in the long term. National Highways supports the creation of sustainable development, with Circular 01/2022 stating that successful development depends upon a movement network that makes connections to destinations, places and communities.
Policy CO2 – Parking Provision in New Development	Part 2: Development Management Policies and Implementation (December 2022)	Point a) of Policy CO2 identifies that residential development in the Central Sub-Area should be car-free or provide 1 space per dwelling where a clear need can be demonstrated. This contradicts the parking details in Annex B (Parking Guidelines) of the Local Plan which suggests that residential development in the Central area should be car free or a maximum of 1 space per 10 dwellings, where it can be justified. This contradiction should be clarified by SCC, as whichever parking policy is implemented could impact on the traffic flows that have been assumed in SCC's traffic modelling of the Local Plan.

Policy / Paragraph Number / Appendix	Document	National Highways' Comments
Annex B – Parking Guidelines (December 2022)	Annex B – Parking Guidelines (December 2022)	<p>The parking standards within this Annex appear to be in line with discussions held between SCC and National Highways.</p> <p>However, the information in Policy CO2 appears to differ from Annex B, with regards to the parking allowance for residential dwellings in the Central area (see comments above on Policy CO2). This matter should be clarified by SCC.</p> <p>Ongoing work between SCC (and their consultants) and National Highways suggests that the parking policy will look to inform the potential impacts at future developments. Therefore, it will be key for future developments to be delivered in line with the parking guidelines.</p>
Key Diagram and Policies Map	Key Diagram and Policies Map	<p>The location and scale of both the housing and employment sites is being considered in order to identify the cumulative traffic impact of the site allocations. Where there is a significant traffic impact at the SRN, SCC will need to ensure that this is mitigated appropriately.</p> <p>It is also noted that the strategic housing sites located outside of the central area are all located next to the SRN. Early engagement and involvement in these sites (as they move through the planning process) is welcomed by National Highways, due to the impact they may have on the continued safe operation of the SRN.</p> <p>Additionally, SCC will need to give consideration as to whether the public transport services around their site allocations, meet the criteria set out for the minimum service frequency standard within Policy NC11.</p>

Policy / Paragraph Number / Appendix	Document	National Highways' Comments
Executive Summary – Page 1 - Transport	Infrastructure Delivery Plan Part 1: Infrastructure Needs Assessment (January 2023)	National Highways agrees that the Plan is likely to impact on the M1 between Junctions 33 and 35 (as well as various other individual junctions). The impact at all SRN junctions within the vicinity of Sheffield is yet to be fully understood by National Highways. However, National Highways is currently working with SCC and their consultants to understand the location and scale of these impacts and how they can be mitigated. Consequently, the further refinements of the modelling and including mitigation measures within the forthcoming Part 2 IDP document is fully supported by National Highways.
Section 4 – Future Infrastructure Needs	Infrastructure Delivery Plan Part 1: Infrastructure Needs Assessment (January 2023)	Whilst it is appreciated that SCC and their consultants are currently working in consultation with National Highways, it is yet to be ascertained whether the traffic impact of the site allocations will be in line with the scale presented within Part 1 of the IDP and also whether the impact will be limited to the SRN junctions listed or whether other individual junctions will be impacted upon. However, we will continue the collaborative working approach we have, and will look to agree the likely traffic impact, necessary interventions and funding streams through the forthcoming SoCG, and future IDP Part 2.

Summary of Response

National Highways is working with SCC to help you derive the necessary mitigation on the SRN to support the Local Plan growth aspirations. These mitigations will need to be included with the IDP, along with identification of funding and delivery mechanisms.

National Highways is generally supportive of relevant wording within the Local Plan although some minor clarifications as identified above, are required in order to ensure that the necessary mitigations are suitably identified, delivered and funded.

I trust this response will be helpful, however should you require any further information, please do not hesitate to contact me.

Yours sincerely



Simon D Jones
National Highways Regional Spatial Planning Manager
North Yorkshire, West Yorkshire, South Yorkshire & Lincolnshire
(Yorkshire & North East Team)

