

**From:** [Redacted]  
**To:** [Redacted]  
**Cc:** [Redacted]  
**Subject:** RE: Publication (Pre-submission) Draft Sheffield Plan 2022 (AAA Property Group: Starbuck Farm)  
**Date:** 20 February 2023 17:46:04  
**Attachments:** [image001.jpg](#)  
[image002.jpg](#)  
[image003.gif](#)  
[image004.jpg](#)  
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[image006.jpg](#)  
[image007.jpg](#)  
[image008.jpg](#)  
[image009.png](#)  
[image010.jpg](#)  
[P4415-SPA-RP-TP-001-B- Local Plan Reprs.pdf](#)  
[Appendix 2 Advocacy \(reduced\).pdf](#)  
**Importance:** High

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Hi,  
On behalf of AAA Property Group, please find attached our response to the Pre-Submission Draft Sheffield Local Plan consultation for their site at Starbuck Farm, Beighton. We trust that you will confirm that these representations are duly made and will give due consideration to these comments. Please do not hesitate to contact us to discuss any issues raised in this Representation further. All the best, Andy  
Kind regards  
ANDREW ROSE  
Associate Director: Chartered Town Planner  
BSc (Hons), MSc, PG DIP, MRTPI

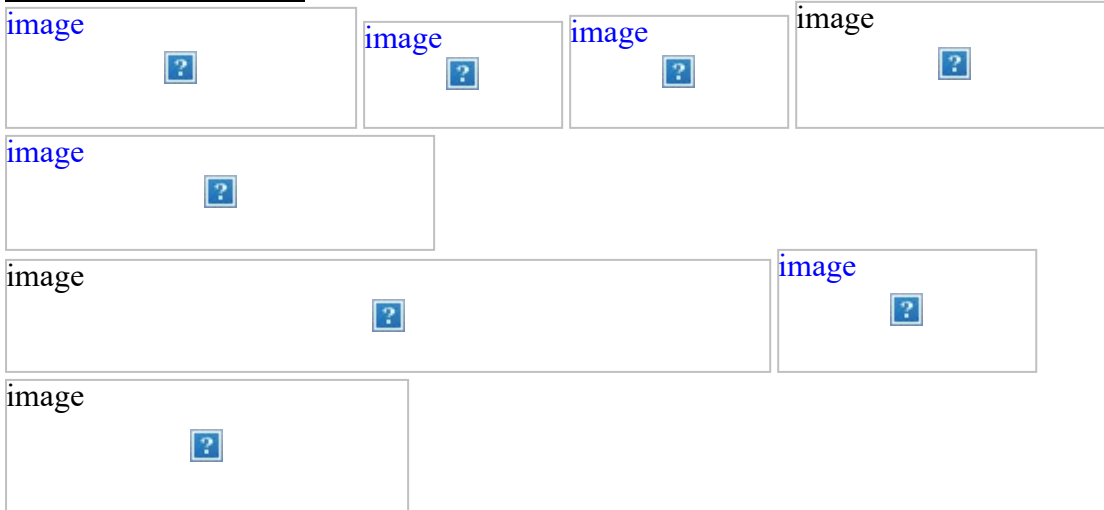


Junction 41 Business Court, East Ardsley, Leeds, WF3 2AB

[Redacted] Web: [www.spawforths.co.uk](http://www.spawforths.co.uk)

Direct: - [Redacted]

[Redacted] LinkedIn:



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**From:** SheffieldPlan <[sheffieldplan@sheffield.gov.uk](mailto:sheffieldplan@sheffield.gov.uk)>

**Sent:** 09 January 2023 10:56

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

Dear 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**

Under the General Data Protection Regulation 2016 (GDPR) and Data Protection Act 2018 (DPA) Sheffield City Council is a Data Controller for the information it holds about you. The lawful basis under which the Council uses personal data for this purpose is consent.

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](mailto: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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AAA Property Group

# Sheffield Plan: Publication (Pre-Submission) Draft

Development Plan Representation

Starbuck Farm, Beighton

February 2023





# 01 Introduction

## Introduction

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- 1.1 Spawforths have been instructed by AAA Property Group to submit representations to the Sheffield Plan Publication (Pre-Submission) Draft, for their site at Starbuck Farm, Beighton.
- 1.2 AAA Property Group welcomes the opportunity to contribute to the emerging Local Plan for Sheffield and is keen to further the role of Sheffield within the Yorkshire and Humber Region as a whole.
- 1.3 AAA Property Group has significant land interests in Sheffield, which can positively contribute towards the housing and economic growth agenda, providing a long term comprehensive approach to the sustainable growth of Sheffield.
- 1.4 AAA Property Group would like to make comments on the following topics and sections of the Sheffield Local Plan (Pre-Submission) Draft:
  - General Comments
  - Vision, Aims, and Objectives
  - Policy SP1: Overall Growth Plan
  - Policy SP2: Spatial Strategy
  - Policy SA1: Central Sub-Area
  - Policy SA2: Northwest Sheffield Sub-Area
  - Policy SA3: Northeast Sheffield Sub-Area
  - Policy SA4: East Sheffield Sub-Area
  - Policy SA5: Southeast Sheffield Sub-Area
  - Policy SA6: South Sheffield Sub-Area
  - Policy SA7: Southwest Sheffield Sub-Area

- Policy SA8: Stocksbridge/Deepcar Sub-Area
- Policy SA9: Chapelton/High Green Sub-Area
- Policy H1: Scale and Supply of New Housing
- Policy ES1: Measures required to achieve Reduced Carbon Emissions in New Development
- Policy ES2: Renewable Energy Generation
- Policy ES3: Renewable Energy Networks and Shared Energy Schemes
- Policy ES4: Other Requirements for the Sustainable Design of Buildings
- Policy NC3: Provision of Affordable Housing
- Policy NC5: Creating Mixed Communities
- Policy NC8: Housing Space Standards
- Policy NC9: Housing Density
- Policy GS6: Biodiversity Net Gain
- Policy GS7: Trees, Woodlands and Hedgerows
- Policy DC1: The Community Infrastructure Levy (CIL) and Other Developer Contributions

- 1.5 In each case, observations are set out with reference to the provisions of the Framework and where necessary, amendments are suggested to ensure that the Local Plan is found sound.
- 1.6 AAA Property Group welcomes the opportunity for further engagement and the opportunity to appear at Examination in Public.
- 1.7 We trust that you will confirm that these representations are duly made and will give due consideration to these comments.
- 1.8 Please do not hesitate to contact us to discuss any issues raised in this Representation further.

# National Planning Policy context and Tests of Soundness

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- 1.9 The Government's core objectives as established through the 2021 National Planning Policy Framework (the 2021 Framework) are sustainable development and growth. Paragraph 11 of the 2021 Framework stresses the need for Local Plans to meet the objectively assessed needs of an area. The 2021 Framework sets out to boost significantly the supply of homes and ensure that a sufficient amount and variety of land can come forward where it is needed. In terms of building a strong and competitive economy the 2021 Framework states that planning should help create the conditions in which businesses can invest, expand and adapt. The key focus throughout the 2021 Framework is to create the conditions for sustainable economic growth and deliver a wide choice of high quality homes and well-designed places.
- 1.10 In relation to Local Plan formulation, paragraphs 15 to 37 of the 2021 Framework state that Local Plans are the key to delivering sustainable development which reflect the vision and aspirations of the local community. The 2021 Framework indicates that Local Plans must be consistent with the Framework and should set out the opportunities for development and provide clear policies on what will and will not be permitted and where. Paragraph 22 is clear that the Strategic policies should look ahead over a minimum period of 15 year period, and where larger scale development such as new settlements or significant extensions to existing villages and towns form part of the areas strategy, then policies should look ahead over a period of at least 30 years.
- 1.11 In relation to the examination of Local Plans, paragraph 35 of the 2021 Framework sets out the tests of soundness and establishes that:

*Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:*

- **Positively prepared** – providing a strategy which as a minimum, seeks to meet the area's objectively assessed needs<sup>1</sup>; and is informed by agreements with other authorities, so that unmet needs from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

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<sup>1</sup> NPPF 2021, Footnote 21 – where this relates to housing, such needs should be assessed using a clear and justified method, as set out within paragraph 61 of this Framework

- **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
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with policies in this Framework and other statements of national planning policy, where relevant.

1.12 This document therefore considers the content of the Regulation 19 Sheffield Local Plan on behalf of AAA Property Group in the light of this planning policy context.



# 02 General Comments

## General Comments

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- 2.1 The Council's approach to the Local Plan is unsound.

## Justification

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- 2.1 AAA Property Group is concerned that the evidence base which supports the Plan appears incomplete and in places lacks clarity. The Framework requires Local Plans to be based on a sound and up-to-date evidence base which identifies a development need and reflects the locational characteristics of the City. It is therefore difficult to comment in depth where there is little supporting information.
- 2.2 Furthermore, as is demonstrated in these representations not all reasonable alternatives have been considered in the preparation of the Local Plan. This could be due to the approach towards decision making on the Spatial Strategy, which does not reflect how Local Plans should be produced.
- 2.3 Local Plans should reflect evidence on employment and housing need and the appropriate Spatial Strategy should be devised that meets those needs. However, this Local Plan is based on a strategy of only meeting the employment and housing needs that can be met within the chosen Spatial Strategy option of the Council and therefore the full needs will not be met as that would take the Local Plan outside of the chosen strategy option.
- 2.4 Climate Change, Economy and Development Transitional Committee were presented Five Spatial Strategy Options on 13<sup>th</sup> January 2022, as follows:
- Option 1: An urban capacity approach – brownfield only.
  - Option 2: As Option 1 but with previously undeveloped land within the urban area also allocated where this is considered sustainable.
  - Option 3: As Option 1 & 2 plus sustainably located brownfield Green Belt sites.
  - Option 4: As Option 1, 2 & 3 plus release of sustainably located greenfield (previously undeveloped) sites in the Green Belt for development where there are site specific exceptional circumstances to justify altering the Green Belt boundary.

- Option 5: As Option 1, 2, 3 & 4 plus release of sufficient greenfield (previously undeveloped) sites in the Green Belt to meet the full housing need figure, as calculated using the Government's standard methodology.
- 2.5 Each option was accompanied by a maximum number of homes per year that could be delivered through that option. The debate that followed therefore focussed on the type of sites being identified first and meeting the housing needs second. Therefore, Members could not, and did not, make an effective decision on satisfying housing needs through the information presented.
  - 2.6 This approach to decision making is unsound as it is not evidence-led on housing need and does not meet the Government's standard methodology on housing need, which is 2,973 dwellings per annum and is the minimum starting point in determining the number of homes needed in an area.
  - 2.7 Furthermore, the evidence showed that to meet the housing need greenfield Green Belt sites should be released. However, Members focussed on the types of sites and housing only, devised that the Council would not meet its housing need and chose Option 3.
  - 2.8 Option 3 was put forward as it would include two brownfield Green Belt sites. These are mentioned in the Transitional Committee report at para 1.6.12, which states that "there are two large brownfield sites in the Green Belt that adjoin the existing urban area. We estimate that, in total, these sites could have capacity for up to 1,100-1,200 homes but they could also be suitable for employment use. Adding these sites to the supply could enable a housing requirement of up to 2,305 per year (see Appendix)." The two brownfield sites are again mentioned in the Options in the appendix.
  - 2.9 The Cooperate Executive Report of 19<sup>th</sup> January 2022 goes further in the accompanying Equality Impact Assessment by highlighting the two sites, which are at Norton and Chapeltown. Members therefore took the decision on the preferred Spatial Option in full cognisance that these two sites would be identified in the Plan.
  - 2.10 Ultimately only a portion of the former Norton aerodrome was released from the Green Belt for 280 new homes and fewer homes have been identified than originally suggested through the committee reports, which shows Option 3 could support the potential for circa 2,305 new homes per annum. However, the draft Local Plan is proposing 2,090 dwellings per year, which is below the suggested level for Option 3. The final proposed Plan therefore does not reflect the information that supported Option 3, is providing fewer homes and also does not meet the standard methodology.
  - 2.11 The evidence base shows that the Council has not assessed all sites and therefore Members could not understand what sites would be identified within each option. The information presented as part of the consideration of **Spatial Options is ill informed and unsound.**
  - 2.12 Subsequently, only sites that fit within Spatial Options 3, as perceived by the Council, have been assessed and considered. The consideration of reasonable alternatives has therefore not occurred. **The approach towards the Plan is therefore unsound.**

- 2.13 Paragraph 3.8 states that the housing growth figures reflect the capacity of the existing urban areas and the restrictions imposed by the Green Belt. However, that is not strictly true as the committee reports show that, in accordance with the Framework, the Council could amend the Green Belt to accommodate the housing requirement as exceptional circumstances would have been demonstrated.
- 2.14 The Spatial Strategy on focussing on types of sites has therefore created an unsustainable short term Plan, which is not meeting the identified needs. This view is reinforced through the introductory text to Policy H1, which states in paragraph 5.3 that “sufficient deliverable sites have been allocated to provide a supply for the first five years of the plan period after adoption” and that “a further supply of developable sites will come forward on other sites”. Paragraph 5.4 states that there is insufficient evidence to demonstrate whether some of the developable supply is deliverable and paragraph 5.6 highlights that public intervention will be needed to enable some of the sites to come forward, due to constraints on site and multiple ownerships. We have reviewed the housing supply position and consider the Local Plan is deficient in its provision, which will be explained in response to Policies SP1 and H1.
- 2.15 The Council has therefore clearly chosen a Spatial Option, and identified sites to suit, and not meet the identified housing need. **AAA Property Group therefore consider that the basis of the Local Plan is unsound.**

#### Viability Assessment

- 2.16 AAA Property Group have undertaken a review of the HDH Planning and Development Whole Plan Viability Assessment (September 2022), which forms part of the evidence base. The difficulties in undertaking whole district Economic Viability Studies are not underestimated. However, it is important that a level of robustness and rigour of testing of the evidence base is undertaken due to the fundamental importance of this document in underpinning the policy direction for the whole plan period.
- 2.17 AAA Property Group note that due to the nature of property market in terms of its cyclical nature and the turbulence of build costs and revenues that any Viability Assessment can only be a point in time and will quickly become out of date. It is therefore clear that the proposed policies need to include more flexibility alongside ambitious demands to enable delivery.
- 2.18 The PPG states that the approach to viability should be: “proportionate, simple, transparent and publicly available”. Further justification is required for several inputs and the raw data on revenues for example should be made available for scrutiny. AAA Property Group is concerned that the Appraisal assumptions and evidence base for many inputs are out of date. This should be reviewed and updated, but also highlights the reason for greater flexibility.
- 2.19 AAA Property Group would like to highlight issues with some of the assumptions within the Viability Appraisal, for example the costs for abnormals where only an allowance of 5% of the BCIS costs is included and that “abnormal costs will be reflected in land value. Those sites that are less expensive to develop will command a premium price over and above those that have exceptional or abnormal costs”.

- 2.20 As the Council's focus in the Local Plan is on urban brownfield sites appropriate development costs should be incorporated into the Viability Appraisal. The Local Plan already highlights that the deliverability and viability of a number of sites is unknown.
- 2.21 AAA Property Group therefore considers that the Local Plan and its evidence base should be updated.
- 2.22 AAA Property Group therefore reserve the right to comment further on the Local Plan and policies when evidence and information is provided.
- 2.23 **As currently drafted, AAA Property Group consider the Local Plan is unsound.**

## Proposed Change

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- 2.24 To overcome the objection and address soundness matters, the following changes are proposed:
- Update the evidence, including the Viability Appraisal.
  - Reflect the evidence base within the Local Plan.
  - Consider all reasonable alternatives, including Green Belt sites.
  - Allocate the site at Starbuck Farm, Beighton for housing use.



# 03 Vision, Aims, and Objectives

## Vision, Aims, and Objectives

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- 3.1 The Vision and Objectives do not reflect the economic growth agenda. Furthermore, there is inconsistency between the Spatial Strategy, identification of sites and the Vision and Objectives. The Plan is therefore unsound.

## Justification

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- 3.2 The Vision is relatively positive. However, there is no mention of housing growth. There are references to “thriving neighbourhoods and communities” and providing “good quality housing offer meeting the needs of different household types and sizes. However, this is particularly vague and does not in turn foster the conditions for “boosting the supply of housing” in accordance with the Framework.
- 3.3 AAA Property Group’s main concern is with the drafting and derivation of the Plan. The “Objectives for thriving neighbourhoods and communities” in paragraph 2.12 states:
- To create a housing market that works for everyone and which provides quality, choice and affordability.*
- To ensure Sheffield has an adequate supply of residential development land so the city can meet its requirement for new housing.*
- 3.4 AAA Property Group considers that the Plan does not reflect this Objective in under providing housing land compared to the identified housing need and not having the range, choice and location of housing sites to cater for creating a healthy housing market.
- 3.5 AAA Property Group considers the strategic approach of the Plan is flawed. The sites are available and have been submitted to the Council to deliver an ambitious Plan for an ambitious City. However, the Plan does not reflect the Vision or Objectives as internally inconsistent.
- 3.6 The Sheffield Local Plan is unsound as drafted.

## Proposed Change

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3.7 To overcome the objection and address soundness matters, the following changes are proposed:

- Update the Local Plan and identify further employment sites.
- Allocate the site at Starbuck Farm, Beighton for housing use.

# 04 Policy SP1

## Policy SP1: Overall Growth Plan

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- 4.1 The Local Plan is not addressing the identified employment requirement and does not reflect the evidence base, national policy and guidance and is therefore unsound.

### Justification

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- 4.2 Policy SP1 states that the Local Plan will deliver 35,530 new homes by 2039, which is 2,090 new homes per year from 2022 to 2039.
- 4.3 However, this will not meet the identified housing need, which in accordance with the Government's standard methodology is 2,973 dwellings per annum, and is therefore not in accordance with the Framework.
- 4.4 The Framework describes the purpose of the planning system to contribute to the achievement of sustainable development. There are three overarching objectives which are central to the achievement of sustainable development: economic, social and environmental. The economic objective is to '*help build a strong, responsive and competitive economy by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure*'. [paragraph 8, Spawforths emphasis]. Plans are required to be prepared positively and in a way that is aspirational but deliverable, and ensure that strategic policies look ahead over a minimum of 15 years from adoption in order to anticipate and respond to long term requirements and opportunities such as those arising from major improvements in infrastructure. Strategic policies include the scale and quality of development and making sufficient provision for housing (including affordable housing), employment, retail, leisure and other commercial development alongside infrastructure, and community facilities.
- 4.5 The Framework is clear that to be considered positively prepared and therefore 'sound' the plan must, as a minimum, meet the Plans objectively assessed needs [NPPF, Paragraph 35].
- 4.6 The Government are committed to boosting the supply of homes and ensuring that a sufficient amount and variety of land can come forward where it is needed, and that the needs of groups with specific housing requirements are addressed. [NPPF, paragraph 60].

- 4.7 The Plan is also expected to create conditions in which businesses can invest, expand and adapt, which requires a clear economic vision and strategy which positively and proactively encourages sustainable economic growth. There should be significant weight on the need to support economic growth and productivity. Plans are required to be flexible enough to accommodate needs that have not been anticipated within the plan. [NPPF, Paragraphs 81 and 82].
- 4.8 The Framework states in paragraph 61 that:
- To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals*
- 4.9 The Planning Practice Guidance (PPG) states that it is expected that the standard method be followed for assessing housing need. The PPG states that the standard method is not mandatory but any other approach will be scrutinised more closely at Examination and there will need to be exceptional circumstances.
- 4.10 As stated within General Comments, AAA Property Group does not consider that exceptional circumstances have been evidenced for an alternative approach. It is clear from the committee reports that the evidence presented showed that greenfield Green Belt sites were required to meet the identified needs, and this would have delivered the desired housing and economic growth aspirations for the Council.
- 4.11 However, the debate focussed on the type of sites and not the evidence or housing need. This does not constitute exceptional circumstances for diverting from the standard methodology for housing as the starting point, which does not allow for affordability, economic growth or the 35% uplift for the top 20 cities and urban centres.
- 4.12 The Committee Report clearly identifies for choosing either Option 4 or Option 5, which are:
- Increase the viability of key strategic infrastructure, thereby enabling it to be delivered, in particular new passenger railway lines/stations;
  - Support the expansion of strategic employment areas;
  - Provide land to meet specialist housing needs in a part of the city where there is no other land available.
- 4.13 The benefits continue highlighting providing opportunities to meet a wider range of market areas; delivering a better mix of house types overall; viability is less of a problem on greenfield sites; enable more affordable homes; support investment in new rail infrastructure such as the Barrow Hill line and Upper Don Valley; and the amount of housing land would be closer to the housing need figure calculated by Government.
- 4.14 Members therefore without appropriate evidence or analysis of reasonable alternatives arbitrarily lowered the housing requirement.
- 4.15 The Icen report in July 2021 which explored Housing, Economic Growth and Demographic Modelling clearly shows that the housing need and therefore the housing requirement should be



higher. The Icen Report identified the standard methodology figure of 2,923 dwellings per annum. Linking with the economic growth aspirations shows a housing requirement of 2,323 dwellings per annum. This again is higher than the housing requirement in the Plan of 2,090 dwellings per annum. The Icen report only suggests reducing the housing requirement if economic activity rates could be increased in the population. However, little evidence is provided on this.

- 4.16 Therefore, all the indications are that without evidence the housing need within Sheffield has been artificially reduced.
- 4.17 AAA Property Group also notes that the Council has identified Broad Locations within the Urban Area for future growth. However, as stated in the supporting text to Policy H1 “there is not yet sufficient certainty to allocate all the land that is potentially suitable for housing in these areas”. These areas require relocation of uses, land assembly and new infrastructure. These sites are long term and cannot be relied upon. AAA Property Group considers appropriate housing sites should be identified to deliver the requisite number of homes for the full Plan period. Furthermore, the equivalent long term sites should be identified in the Green Belt. In accordance with the Framework safeguarded land for longer term development needs should be identified and which can be released as a resource to ensure the housing needs of the City are met
- 4.18 **AAA Property Group is concerned that the this Local Plan does not seek to meet its identified needs with regards to housing and employment and has not been prepared positively having regard to the economic growth aspirations of the City Region, and beyond.**

#### Economic Growth

- 4.19 Sheffield forms an important part of the Northern Powerhouse and it is the driving force in the Sheffield City Region. The South Yorkshire authorities form a key economic area between the rest of Yorkshire and the North of England and the Midlands. Sheffield is located on the M1/M18 as key routes to the north, south and east and the Midland Mainline railway.
- 4.20 The Council is seeking to create 219.3 hectares of new employment land over the Plan period, which will create economic investment and additional jobs.
- 4.21 The Sheffield City Region Strategic Economic Plan 2021-2041 focusses on the growth of Sheffield, Rotherham, Barnsley and Doncaster. The SEP highlights that having available “good quality, well connected and attractive land for new homes and jobs is a major competitive advantage for the SCR”. The SEP therefore states that to deliver the growth aspirations “we must bring forward a combination of mixed-use developments, large strategic opportunities and strategic regeneration in key growth areas”. The SEP continues stating that “we need to focus on a small number of big opportunities – sites and developments that have the scale to benefit the wider city region”.
- 4.22 The SEP seeks to target growth in GVA of an extra £7.6 billion and an extra 33,000 higher level jobs. Despite this focus the plan still acknowledges that the strongest employment growth forecast is within lower productivity sectors, such as residential care, food and logistics.

- 4.23 It is therefore evident that the emerging Sheffield Local Plan is not in accordance with the aims and objectives of the Strategic Economic Plan for the Sheffield City Region and could undermine its delivery.

#### Housing Need

- 4.24 The Framework is clear that to be considered positively prepared and therefore 'sound', the Plan must, as a minimum, meet the Plan Area's objectively assessed needs.
- 4.25 The PPG is clear that the standard method identifies a minimum annual housing need figure and that it does not produce a housing requirement figure. It is also clear that the affordability adjustment within the standard methodology is just to ensure that the minimum housing needs starts to address affordability of homes. It therefore does not fully address affordability issues.
- 4.26 The PPG goes on to identify the circumstances when it is appropriate to plan for a higher housing need figure than the standard methodology identifies. *'The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides the minimum starting point in determining the number of homes needed in an area...it does not predict the impact of future government policies, changing economic circumstances or other factors that might have an impact on demographic behaviour. Therefore there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicate.'*
- 4.27 *This will need to be assessed prior to and separate from, considering how much of the overall need can be accommodated. Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:*
- 4.28 *Growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth*
- 4.29 Strategic infrastructure improvements that are likely to drive an increase in the homes needed locally;
- 4.30 *An authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground.*
- 4.31 *There may, occasionally be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently produced SHMA) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need that the standard model suggests'. Paragraph 010 Reference ID: 2a-010-20190220.*
- 4.32 The Council need to recognise that the development of new housing will bring forward additional economic benefits to the area. The relationship between economic performance in an area and housing is complex, but having the right quantity, quality and balance of housing in an area is necessary for economic growth. The development of new housing can therefore support local economic growth, both through direct job creation through the construction phase of the scheme, but also through the increased population which will create sustainable local jobs from the

increased demand for goods and services. This provides an important sustainable development opportunity for Sheffield.

- 4.33 Importantly the HBF released in July 2018 its report on “the economic footprint of house building in England and Wales”, which shows that house building in England and Wales is now worth £38bn a year and supports nearly 700,000 jobs. House building activity contributes economically in different ways including providing jobs, tax revenues and contributing funding for local infrastructure and communities. House building supports the economy in a wider sense through being a driver for economic growth; delivering jobs and economic value; supporting labour market mobility; creating skills and employability; enhancing place competitiveness; creating quality of place and reusing brownfield land.
- 4.34 An important conclusion of the report and the wider economic benefits is that a healthy, well-functioning labour market requires a good supply of housing that is affordable for local people to enable them to move jobs freely and match up skills supply with employer demand. A dysfunctional housing market can inhibit labour market mobility, in turn stifling economic growth.
- 4.35 AAA Property Group maintain that there are clear circumstances in Sheffield which demonstrate that housing need in Sheffield is higher than the figure that results from the use of the standard method. These include:
- The growth strategy
  - Past delivery rates
  - Affordable housing need
- 4.36 The standard methodology is based on 2014 SNPP projections. Although, the Government has accepted that there are flaws in the approach to the standard method, it is still the most appropriate approach at this time to boost the supply of homes and ensure the delivery of 300,000 homes per annum. The Government has committed to levelling up the UK economy, and to achieving a better distribution of homes where homes are identified in more high-demand areas and in emerging demand areas across the country (such as the Northern Powerhouse). This will help avoid issues where unaffordable areas in high demand are planning for low numbers of homes due to past trends of suppressed household formation.
- 4.37 AAA Property Group appreciate that the Government has recently consulted on proposed changes to the Framework, which reinforces the need to an evidence base, the uplift for the top 20 most populated centres, still highlights meeting the housing need for the area and that you can still amend Green Belt boundaries to meet the need and growth ambitions. The proposed changes to the Framework are not Government policy at present and therefore any other changes to the Framework do not apply to this Local Plan Review.

#### Housing Requirement – Economic Growth

- 4.38 Sheffield is an integral part of the Sheffield City Region and the ambitious growth aspirations. Therefore, as highlighted earlier to achieve the aspired growth that the City Region is seeking to achieve, and is securing Government funding for, the level of new housing needs to reflect the ambitions of the Strategic Economic Plan.

- 4.39 Furthermore, the Sheffield City Region Integrated Infrastructure Plan states:
- 4.40 *A quality housing offer has a crucial role to play in the future economic growth of the City Region. It is essential to attracting and retaining a skills base that supports inward investment as we as meeting existing and future community needs and retention of Sheffield City Region (SCR) talent.*
- 4.41 *It has been identified that between 70,000 and 100,000 additional homes are needed in SCR to support the proposed economic growth over the next 10 years. These will have the dual benefit of providing accommodation that underpins the proposed increase in employment (70,000 jobs), as well as the wider economic benefits that housing investment brings.*
- 4.42 *Housing forms a key component of the SCR construction sector. The CBI [CBI (2012) Bridging the Gap – Backing the Construction Sector to Create Jobs] estimates that every £1 spent on construction projects yields a total of £2.84 expenditure in the wider economy. It is estimated that approximately £2,000 per annum per household spending on local convenience goods, and approximately £2,700 per annum per household spending on local comparison goods can be attributed to residents in new housing. (Over the lifetime of the SEP, a similar amount would generate at least £400 million for the SCR economy). The GVA benefits that can be attributable to new housing are as follows:*
- Construction: material, labour professional skills and other services for construction, compounded by supply chain benefits
  - Household Maintenance Spend: Spend on products and services associated with each new household
  - Direct Job Uptake: GVA resulting from new productive workers moving into SCR, compounded by their spend on SCR products and services
  - Indirect (Chain) Benefits: As SCR residents move up the housing chain, this creates new available space in different sub-markets.
  - Preventing Displacement: The type and location of construction may be important in mitigating losses of households from the city region that might otherwise occur.
- 4.43 Within this context it is important that the Council plans for new jobs and associated new homes in accordance with the Strategic Economic Plan growth aspirations.
- 4.44 As highlighted earlier, the SEP established a target to deliver 33,000 new high skilled jobs. The SEP has an ambition for the economy to work for everyone and will be a net contributor to the national economy, retain talent and attract new investors to locate in the region. It recognises the relationship between housing and economic growth, with a key commitment to make homes and land available for families and businesses to locate and grow. Within Sheffield there is an objective of creating an inclusive wellbeing economy; increasing 'good' jobs; supporting growth of productive and competitive business; recognise the importance of place; consolidate Sheffield as a Magnet City; Transformed transport connectivity, linking people to jobs; housing that provides quality, choice and affordability across the city.
- 4.45 The SEP is clear that there is a need to maintain housing growth, alongside investing in the quality of existing stock. The SEP continues to recognise the significant potential for the Sheffield



economy and the need to unlock that potential. This SEP does not set a specific job target for overall jobs growth, although as indicated above the ELR notes that evidence to support the SEP indicated a target of 1% jobs growth across the SCR, which the ELR notes was a reasonable forecast for Sheffield.

- 4.46 In recognition of this ambition for Sheffield within the SEP, and in order to support the vision set out within the emerging Local Plan that Sheffield will be playing a nationally significant economic role at the heart of the region, there is a need to ensure that the level of housing growth planned for, aligns with the economic growth. It is critical that this supports jobs growth in terms of both the quantum of housing offered but also in terms of the choice of size, type, tenure and location, reflecting the diversity of the economy, the forecast growth in lower productivity sectors, and the targets to increase higher skilled jobs.
- 4.47 As highlighted earlier, the Icen Report does not appropriately show the implications on economic growth for the proposed housing requirement of 2,090 homes per annum. The report suggests that the housing requirement could be lowered if economic activity rates were increased, however there is no modelling or evidence to support such assertions.
- 4.48 Therefore there is a clear need to model the implications of aspirational yet deliverable jobs growth on housing growth, acknowledging the sectors forecast to grow as well as those being targeted.
- 4.49 AAA Property Group reserve the right to comment further following the preparation of any further evidence by the council. AAA Property Group consider on the basis of the SCR ambition and Sheffield strengths and opportunities that **the housing requirement needs to be uplifted to reflect the aspirations for jobs growth.**
- 4.50 AAA Property Group note in the earlier Issues and Options Paper that the SA has assessed an option for housing growth that was consistent with the Aspirational Job growth scenario by Edge, for circa 2660 dwellings per annum. This option is considered to perform as well in the sustainability appraisal as the option pursued within the Issues and Options document and better than the proposed option in terms of Aim 1: A vibrant and competitive economy with good job opportunities available to the whole economy.

Housing Requirement – Housing Delivery

- 4.51 As stated above PPG indicates that consideration can be given to delivery rates, for the last five years net completions have been higher than the proposed local plan target in all but two years. Net completions amount to 11,811 dwellings, with annual completions as follows:

2016/17	2017/18	2018/19	2019/20	2020/21
2,458	2,386	2,000	3,101	1,866

- 4.52 The year 2020/21 is largely affected by Covid-19 Pandemic and should therefore be considered an outlier. Therefore, this demonstrates that there is sufficient demand to support a requirement above the standard methodology of 2,923 dwellings per annum, and the plan requirement of 2,090 dwellings per annum. The annual average over the four years 2016/17 to 2019/20 is 2,486 dwellings. Furthermore, the Council acknowledged within the earlier consultations, including the Issues and Options in 2020 that much of the completions are as a result of the delivery of student housing, and that there is still a need to deliver family housing. Page 26 of the Issues and Options document notes that every year “people move from Sheffield to other districts in the Sheffield City Region. In particular there is a trend for people wanted suitable family housing to move to Rotherham, North East Derbyshire and Barnsley, demonstrating the need to ensure that a full range of house types, sizes and tenures are provided in order to deliver a balanced housing market, support economic growth and foster more sustainable travel patterns”.
- 4.53 The Housing Technical Paper that supported the Issues and Options consultation states in paragraph 2.20 the annual average over the last six years of 2,230 homes per annum has been at a level around that which will be needed to meet the plan requirement. It will therefore be important that the Sheffield Plan identifies enough deliverable land.
- 4.54 There is therefore evidence of both delivery at a higher rate and recently published evidence that indicates a higher need for housing. As stated above, PPG is clear that this evidence should be taken into account when determining the housing requirement.
- 4.55 AAA Property Group consider further evidence is required to demonstrate whether the affordable housing needs of Sheffield can be met based on a target of 2,090 dwellings per annum. Whilst it is accepted that the calculation of local housing need figure includes an adjustment for affordability, however there are inherent issues with reliance on the workplace –based median house price to median earnings ratio and its ability to reflect affordability issues on the ground.
- 4.56 The joint SHMA considers that the current need for affordable housing amounts to 902 dwellings per annum. The current need for affordable housing, 902 affordable units, represents 43% of the Local Plan requirement for housing. The emerging Local Plan proposes the following requirement for affordable housing: 30% in high value areas, 10% in most other areas. Critically the Plan indicates that there are areas including the city centre where it is not viable to provide any affordable housing. This is where the Plan seeks to focus a significant proportion of the housing requirement within each of the three spatial options.
- 4.57 The affordable completions for the last six years (based on Live Table 1011) are as follows:

2016/17	2017/18	2018/19	2019/20	2020/21	2021/22
327	99	165	129	207	131

- 4.58 It is evident from this information that the total affordable completions fall below the identified affordable need, even when total completions are higher than the proposed Local Plan requirement of 2,090 per annum. Therefore, in the context of the level of affordable need, viability issues, and a likely upper requirement for 30% affordable housing, AAA Property Group are concerned that a target of 2,090 dwellings per annum will not deliver sufficient number and range of affordable homes to meet the identified needs within the City. In order to deliver 902 affordable dwellings per year, a requirement of at least 3,000 dwellings per annum would be required. This assuming the achievement of an average of 30% affordable housing, which represents two times that of the highest achieved over the last three years of monitoring, and given viability issues within parts of the city would still require significant public sector investment. Importantly the SHMA notes a worsening picture of need in Sheffield for a variety of reasons including an insufficient supply of new affordable housing to meet previously identified requirements. It considers that the Plan must increase the supply of affordable housing in a sustainable and long term way. An uplift to the overall requirement will serve to support the delivery of affordable housing in Sheffield.
- 4.59 AAA Property Group consider that there is sufficient evidence pointing to the need for further uplift in the Local Plan housing requirement, based on the need to support the local plans economic ambitions, evidence of delivery and the need to ensure sufficient delivery of affordable housing.
- 4.60 AAA Property Group consider that the policy in its current form is not justified and is not consistent with the Framework the Plan in its present form could fail to deliver sustainable development in accordance with policies in the Framework. In these circumstances, we do not consider the Sheffield Local Plan in its current form to be sound.
- 4.61 However, AAA Property Group consider that with a higher requirement, of at least 3,000 homes as a minimum to reflect current delivery, meet the economic growth aspirations, and to ensure that the needs for affordable homes can be met. This reflects the standard methodology.

### Assessment of Housing Supply

- 4.62 A brief review of a number of the proposed allocation sites has been undertaken and is attached at Appendix 1. An assessment has been undertaken of whether they will be likely to deliver housing units in the first five years of the local plan being adopted and whether they are developable over the plan period.
- 4.63 Paragraph 74 of the Framework sets out that: *“Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years worth of housing against their housing requirement set out in adopted strategic policies.”*
- 4.64 The Framework provides a definition of deliverable: *“To be considered deliverable, sites for housing should be available now, off a suitable location for development now and be achievable with a realistic prospect that housing will be delivered on the site within five years...”*
- 4.65 The Framework provides a definition of developable: *“Sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.”*

- 4.66 This analysis has had regard to the site assessments contained within the Site Selection Methodology (January 2023), the Five Year Land Supply monitoring report and also included a desktop review of using the planning portal, land registry and google earth to ascertain whether there were any ownership constraints, existing businesses or other uses currently occupying the sites which may preclude or delay delivery onsite. Findings of this analysis are noted in the comments section in the table below.
- 4.67 The 5 Year Housing Land Supply Monitoring Report (December, 2022) does not provide a list of specific sites which contribute to the Five Year Land supply and therefore it is impossible to analyse those sites to ensure they are deliverable. We have instead reviewed a sample of the proposed allocation sites to assess whether they are deliverable and developable.
- 4.68 Table 4 of the 5 Year Housing Land Supply Monitoring Report (December 2022) states that the current 5-year deliverable supply is 3.63 years. The Authority Monitoring Report (January 2023) notes at paragraph 5.13 that the: *"...current deliverable land supply is 3.63 years. This covers the period 2022/23 to 2026/27 and has been calculated using the Government's local housing need figure (currently 3,018 additional homes per year)."* The same paragraph goes on to state that: *"Taking account of the proposed housing requirement in the Publication Draft Local Plan the current deliverable supply would be 5.37 years in advance of the allocations being adopted in the plan."* The proposed housing target is 2,090 homes per annum from 2022 to 2039 and does not take account of the 35% uplift for cities.
- 4.69 The analysis covered 36 sites with a total capacity of 9,712 units. The total available supply according to the Sheffield Housing and Economic Land Availability Assessment (December 2022) is 35,578 units. Therefore this assessment covers approximately 27% of all of the housing supply across the district. It is our belief that if our analysis were to be extended to cover the entirety of the supply similar conclusions would emerge, namely that many of the proposed allocations have significant deliverability concerns and therefore are unlikely to deliver the required housing to meet the needs of the district.
- 4.70 Of the 36 sites our analysis demonstrates that only 8 are likely to deliver housing units within the first five years of the plan being adopted. The output from these 8 sites has been assessed utilising realistic rates of delivery and lead in times. Where land is within multiple ownerships and requires assembly we have allowed 1 year. We have allowed 2 years for planning applications to be approved. We have assumed a lead in time of six months from planning permission to the first units being delivered. Where sites are large (i.e. over 500 units) and do not yet have planning permission it is unlikely that they will deliver housing within the first five years of the plan. On sites which are likely to be comprised of estate housing rather than flats we have assumed delivery of 30 dwellings per annum per outlet.
- 4.71 Our analysis has shown that only approximately 759 units are deliverable within the first five years of the plan or 7.8% of the total capacity of the 36 housing allocations (9,712 units) which were analysed.
- 4.72 Regarding the remaining 28 sites, an assessment of whether they are developable has been undertaken. Of the remaining 28 allocation sites only 5 have been shown to be developable. Therefore our assessment shows that 23 of the sites do not have a reasonable prospect of delivering housing units within the plan period.

- 4.73 The 23 sites which have been identified as not developable include a sites which are currently occupied by other uses, such as a Mecca Bingo Hall, a B & Q store, a Decathlon store and a Wickes store. They also include areas of land which are covered by multiple ownerships with existing businesses operating from them. No evidence has been provided that there is a reasonable prospect that these sites will become available for development.
- 4.74 The 23 sites which have been identified as undevelopable include capacity for 6,381 dwellings. There is very little prospect of these sites coming forward during the plan period and therefore alternative sites will need to be found to accommodate the required housing need for the district.
- 4.75 Therefore, there is no five year housing land supply and there is no evidence of a supply of housing for the Plan period.
- 4.76 Furthermore, as stated earlier the introduction to Section 5: Housing Policies acknowledges the difficulties with the housing supply over the Plan period, stating that “there is not yet sufficient evidence to show it is deliverable before 2029” and that “public intervention will be needed to enable much of the former employment land to transition to sustainable, desirable residential areas” and that “many of the potential development sites have multiple owners” and there is a need for financial support from the Government.

#### Windfall Allowance

- 4.77 Furthermore, it appears the Council are seeking to rely on a windfall allowance of circa 200 dwellings per year, which is 1,000 homes over the first five years of the Plan. This is evidenced in the Housing Land Supply report in paragraph 3.17. However, this shows completions dropping from 2018/19 onwards, which shows from 2018-2022 the average completions being 144 dwellings per annum. Furthermore, the Council is seeking to apply the windfall allowance from Year 1 and therefore there is a risk of double counting.
- 4.78 It is important in relation to windfalls that there is sufficient evidence to demonstrate that this will continue. Sheffield does not currently have an up to date Plan and therefore there are significant windfalls. AAA Property Group would expect that the level of windfalls would reduce with the allocation of sites within a recently adopted Plan. AAA Property Group suggest the windfall allowance be reduced accordingly and sufficient allocations be identified.

#### **Exceptional Circumstances**

- 4.79 Therefore, there is a significant shortfall in the proposed housing provision and the Council accepts the need to utilise the Green Belt for housing purposes by allocating the Norton Aerodrome site. AAA Property Group consider further sites should be identified to address the shortfall and meet the need and demand for homes.
- 4.80 AAA Property Group is concerned that the Council is effectively deferring the issue to a future Local Plan Review. This is not in the spirit of the Framework, where it is clear that there are exceptional circumstances to justify the release of green belt, attributed to the scale of need for both housing and employment land. The approach to Green Belt release being taken within the emerging Local Plan is very short sighted and effectively seeks to defer the decision on Green

Belt release until a future plan review. It is accepted that the Framework requires authorities to examine all other 'reasonable' options for meeting its identified needs for development before concluding exceptional circumstances exist to justify changes to the Green Belt. However, this has already occurred through the release of the Norton Aerodrome site.

- 4.81 The Framework is clear that strategic policies should set out an overall strategy for the pattern and scale of development and makes sufficient provision for housing and that strategic policies should look ahead over a minimum 15 years from adoption to anticipate and respond to long term requirements and opportunities. It is not reasonable to adopt an approach that does not identify sufficient land to meet the needs within the Plan.
- 4.82 The Green Belt has not been reviewed since the late 1960's. The Local Plan presents an opportunity to review the Green Belt and ensure that the revised boundary has permanence in the long term to endure beyond the Plan period. Paragraph 136 of the Framework considers that Green Belt Boundaries can change in "exceptional circumstances". Such circumstances exist in Sheffield through the significant need to provide housing and employment land within Sheffield to meet identified needs.
- 4.83 The Framework is clear that when drawing up or reviewing Green Belt boundaries, that the need to promote sustainable patterns of development should be taken into account. Where it is necessary to release Green Belt land for development, plans are required to give first consideration to land which has been previously-developed and or is well-served by public transport.
- 4.84 AAA Property Group consider that the release of Green Belt sites should prioritise sites that benefit from good public transport connections consistent with the Framework and the overall aims of the Plan. AAA Property Group consider that the strategy for Green Belt release should therefore have regard to sites that could facilitate the delivery of public transport improvements, the identified Mass Transit Corridors and public transport connections available to enable residents to access employment alongside other services and facilities.

**To check unrestricted sprawl**

- 4.85 The allocation of the site will require some encroachment into the Green Belt. Part of the existing Green Belt boundary around Beighton is not considered to be robust as it is formed by the rear gardens of existing housing. A new robust Green Belt boundary will be formed using the A57 as a distinct feature.

**To prevent neighbouring towns from merging**

- 4.86 The site is well contained by the A57 to the north. The site is also contained by houses to the south, Beighton Road to the west and the railway line to the east.

**To assist in safeguarding the countryside from encroachment**

- 4.87 A strong green network, including Beighton Marsh and Shire Brook Valley Nature Reserve lie to the north of the A57. To the west of the railway line are further green areas, including the River Rother and Rother Valley Country Park. The site is therefore surrounded by a network of green spaces and is contained by the A57, which creates a robust defensible Green Belt boundary.

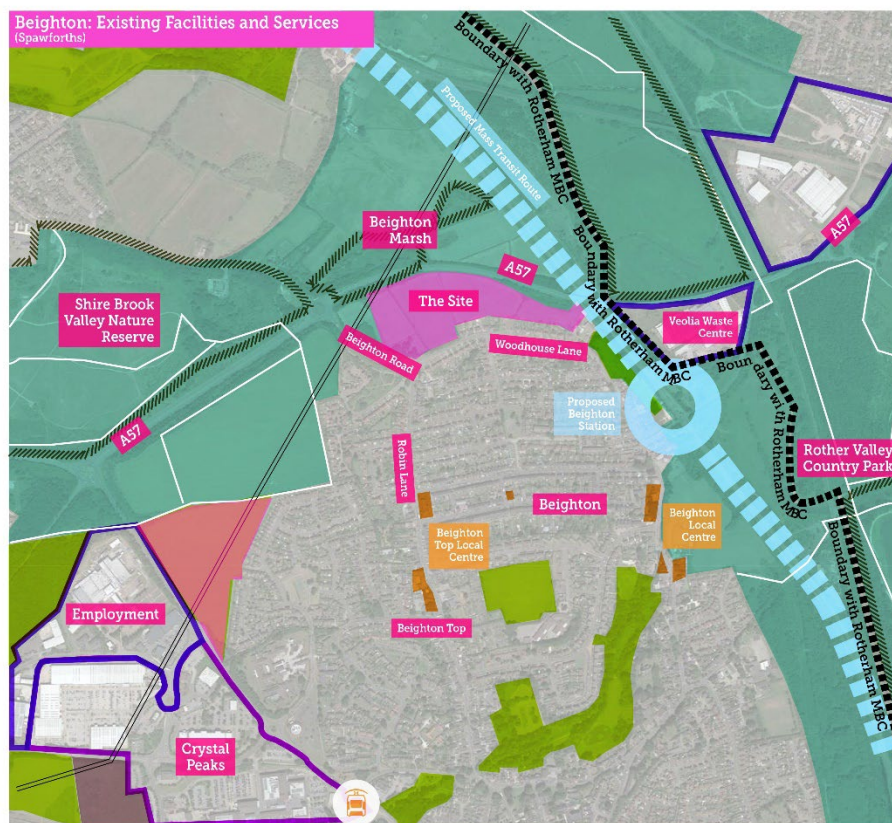


**To preserve the setting of historic towns**

- 4.88 Beighton is not within a conservation area and the site is not adjacent to a designated conservation area. The allocation of the site will not affect the setting of a historic town.

**To assist in urban regeneration**

- 4.89 The site is partly within the Green Belt and partly within the current urban area of Sheffield. The site can enable the re-opening of the railway station at Beighton.
- 4.90 The impact on the openness of the Green Belt will be limited as the site is contained within its landscape, in an area which is influenced by existing residential and commercial development and the A57. It can therefore be demonstrated that the site has a limited role to play when considered against the five purposes of the Green Belt, and the development of the site will not undermine the integrity of the Green Belt.



**Regeneration Imperative**

- 4.91 The Starbuck Farm site is partly in the Urban Area of Sheffield and should therefore be considered for allocating for housing purposes to address the shortfall in provision.

- 4.92 The Starbuck Farm site proposals embody the themes and can facilitate the achievement of the Sustainable City Principles. Importantly, the site is close to the Supertram route at Crystal Peaks, it is accessible to the M1 Motorway at Junction 31 and is adjacent to the Barrow Hill Line, which potentially is re-opening with a railway station at Beighton as part of the city region's Integrated Rail Plan. This alongside the ability to create new and enhanced green routes and the accessibility to green spaces close to the site creates a healthy environment for new and existing residents.
- 4.93 The site accords with the options set out through the URBED report in 2015, which highlighted areas where “confident bites” should be taken from the Green Belt, especially areas that are within 800m of existing services and facilities.
- 4.94 The site can assist in the regeneration and urban renaissance of Beighton through diversifying the housing mix and creating opportunities for aspirational homes.

### Site Proposals

- 4.95 AAA Property Group therefore consider that their site at Starbuck Farm should be allocated for housing purposes to address this significant shortfall in housing over the Plan period.
- 4.96 The Starbuck Farm site is an appropriate site to provide for the housing needs of the Plan area in the short term. The site is available, suitable and achievable and therefore deliverable in accordance with the Framework.
- 4.97 The Starbuck Farm site is partly within the Sheffield Urban Area and should be considered as a priority for allocation.
- 4.98 A site summary is provided in response to Policy SA5 and the Advocacy Report is attached at Appendix 2.

## Proposed Change

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- 4.99 To overcome the objection and address soundness matters, the following changes are proposed:
- Update the evidence base.
  - Increase the housing requirement.
  - Identify further housing sites.
  - Identify safeguarded land for longer term development.
  - Allocate the site at Starbuck Farm, Beighton for housing use.



# 05 Policy SP2

## Policy SP2: Spatial Strategy

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- 5.1 The Spatial Strategy will not deliver the housing need and does not reflect the evidence base, national policy and guidance and is therefore unsound.

### Justification

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- 5.2 As highlighted earlier in the General Comments section of these representations, AAA Property Group has concerns with the approach of the Spatial Strategy and how it was identified.
- 5.3 AAA Property Group does not consider that the Spatial Strategy and the strategic approach of the Plan will meeting the identified housing needs.
- 5.4 The Spatial Option 3 proposed is one of urban brownfield and greenfield sites and one brownfield housing site in the Green Belt for circa 280 homes. AAA Property Group considers that their site at Starbuck Farm, Beighton should be identified. The site is already partly within the Urban Area, is in a sustainable location close to services and facilities and can facilitate the delivery of public transport improvements.
- 5.5 AAA Property Group considers that the strategy should be developed to meet the identified needs and should be developed in such a manner that does not prevent the delivery of other sustainable sites or sustainable developments.

### Proposed Change

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- 5.6 To overcome the objection and address soundness matters, the following changes are proposed:
- Update Spatial Strategy to address the evidence base and meet the identified housing needs.
  - Allocate the site at Starbuck Farm, Beighton for housing use.

# 06 Policy SA1

## Policy SA1: Central Sub-Area

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- 6.1 The Central Sub-Area sites will not meet the identified need for housing.

### Justification

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- 6.2 This Sub-Area includes significant urban brownfield sites and a significant proportion of the proposed new homes over the Plan period. However, as highlighted earlier there is very little evidence on the deliverability of the sites allocated.
- 6.3 As stated earlier this is evidenced within the start of the housing chapter the difficulties with the housing supply over the Plan period, stating that “there is not yet sufficient evidence to show it is deliverable before 2029” and that “public intervention will be needed to enable much of the former employment land to transition to sustainable, desirable residential areas” and that “many of the potential development sites have multiple owners” and there is a need for financial support from the Government.
- 6.4 AAA Property Group have analysed the potential housing supply, as summarised in response to Policy SP1 and a summary table attached at Appendix 1. This shows sites in this area, including Sites SV07, HC15, SV08, SV09, SU06, HC04 and SV10 all having significant deliverability constraints comprising sites which are still currently in use and operational, no evidence on availability and multiple ownerships.
- 6.5 AAA Property Group therefore considers that the strategy should be developed to meet the identified needs and should be developed in such a manner that does not prevent the delivery of other sustainable sites or sustainable developments.

### Proposed Change

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- 6.6 To overcome the objection and address soundness matters, the following changes are proposed:

- Update Spatial Strategy to address the evidence base and meet the identified housing needs.
- Allocate the site at Starbuck Farm, Beighton for housing use.

# 07 Policy SA2

## Policy SA2: Northwest Sheffield Sub-Area

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- 7.1 The Northwest Sheffield Sub-Area sites will not meet the identified need for housing.

### Justification

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- 7.1 This Sub-Area includes 1,015 new homes. However, as highlighted earlier there is very little evidence on the deliverability of the sites allocated.
- 7.2 As stated earlier this is evidenced within the start of the housing chapter the difficulties with the housing supply over the Plan period, stating that “there is not yet sufficient evidence to show it is deliverable before 2029” and that “public intervention will be needed to enable much of the former employment land to transition to sustainable, desirable residential areas” and that “many of the potential development sites have multiple owners” and there is a need for financial support from the Government.
- 7.3 AAA Property Group have analysed the potential housing supply, as summarised in response to Policy SP1 and a summary table attached at Appendix 1. This shows for example sites NWS10 and NWS12 where there is no evidence of availability. NWS12 has a lapsed planning permission and NWS10 is an existing industrial site, which although has planning permission for 80 homes, the existing use on site is continuing and there is no evidence of a larger number of homes towards 169 dwellings as identified in the Local Plan.
- 7.4 AAA Property Group therefore considers that the strategy should be developed to meet the identified needs and should be developed in such a manner that does not prevent the delivery of other sustainable sites or sustainable developments.

### Proposed Change

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- 7.5 To overcome the objection and address soundness matters, the following changes are proposed:

- Update Spatial Strategy to address the evidence base and meet the identified housing needs.
- Allocate the site at Starbuck Farm, Beighton for housing use.

# 08 Policy SA3

## Policy SA3: Northeast Sheffield Sub-Area

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- 8.1 The Northeast Sheffield Sub-Area sites will not meet the identified need for housing.

### Justification

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- 8.2 This Sub-Area includes 970 new homes. However, as highlighted earlier there is very little evidence on the deliverability of the sites allocated.
- 8.3 As stated earlier this is evidenced within the start of the housing chapter the difficulties with the housing supply over the Plan period, stating that “there is not yet sufficient evidence to show it is deliverable before 2029” and that “public intervention will be needed to enable much of the former employment land to transition to sustainable, desirable residential areas” and that “many of the potential development sites have multiple owners” and there is a need for financial support from the Government.
- 8.4 AAA Property Group have analysed the potential housing supply, as summarised in response to Policy SP1 and a summary table attached at Appendix 1.
- 8.5 AAA Property Group therefore considers that the strategy should be developed to meet the identified needs and should be developed in such a manner that does not prevent the delivery of other sustainable sites or sustainable developments.

### Proposed Change

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- 8.6 To overcome the objection and address soundness matters, the following changes are proposed:
- Update Spatial Strategy to address the evidence base and meet the identified housing needs.
  - Allocate the site at Starbuck Farm, Beighton for housing use.

# 09 Policy SA4

## Policy SA4: East Sheffield Sub-Area

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- 9.1 The East Sheffield Sub-Area sites will not meet the identified need.

### Justification

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- 9.2 This Sub-Area includes 2,945 new homes. However, as highlighted earlier there is very little evidence on the deliverability of the sites allocated.
- 9.3 As stated earlier this is evidenced within the start of the housing chapter the difficulties with the housing supply over the Plan period, stating that “there is not yet sufficient evidence to show it is deliverable before 2029” and that “public intervention will be needed to enable much of the former employment land to transition to sustainable, desirable residential areas” and that “many of the potential development sites have multiple owners” and there is a need for financial support from the Government.
- 9.4 AAA Property Group have analysed the potential housing supply, as summarised in response to Policy SP1 and a summary table attached at Appendix 1. This shows for example sites ES25 and ES27. ES 25 is currently in open space use and where the Open Space Assessment highlights insufficient green space in the locality, whilst ES27 is a cleared site that requires intervention to come forward and will therefore take time.
- 9.5 AAA Property Group therefore considers that the strategy should be developed to meet the identified needs and should be developed in such a manner that does not prevent the delivery of other sustainable sites or sustainable developments.

### Proposed Change

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- 9.6 To overcome the objection and address soundness matters, the following changes are proposed:

- Update Spatial Strategy to address the evidence base and meet the identified housing needs.
- Allocate the site at Starbuck Farm, Beighton for housing use.



# 010 Policy SA5

## Policy SA5: Southeast Sheffield Sub-Area

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- 10.1 The Southeast Sheffield Sub-Area sites will not meet the identified need.

### Justification

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- 10.2 This Sub-Area includes 1,640 new homes. However, as highlighted earlier there is very little evidence on the deliverability of the sites allocated.
- 10.3 As stated earlier this is evidenced within the start of the housing chapter the difficulties with the housing supply over the Plan period, stating that “there is not yet sufficient evidence to show it is deliverable before 2029” and that “public intervention will be needed to enable much of the former employment land to transition to sustainable, desirable residential areas” and that “many of the potential development sites have multiple owners” and there is a need for financial support from the Government.
- 10.4 AAA Property Group have analysed the potential housing supply, as summarised in response to Policy SP1 and a summary table attached at Appendix 1. This shows for example sites SES10, SES11 and SES12. SES12 is another area of open space, whilst there is no evidence that SES11 is available.
- 10.5 AAA Property Group therefore considers that the strategy should be developed to meet the identified needs and should be developed in such a manner that does not prevent the delivery of other sustainable sites or sustainable developments.
- 10.6 The Sub-Area could provide for further housing through the identification of AAA Property Group’s site at Starbuck Farm, Beighton. The Advocacy Report (Appendix 2) **provides evidence that the site is available, suitable and achievable and therefore accords with the Framework in relation to deliverability.**

### Overview of Proposals

- 10.7 The Advocacy Report sets out the high level context and ambitions for the site at Starbuck Farm. An illustrative masterplan for the site shows the potential for the site, including green and blue

infrastructure. The proposal provides significant benefits which are explained throughout the report which critically include the ability to regenerate Beighton and meet the strategic need for new homes, with opportunities to connect to an existing green network.

**10.8** The scheme aims to deliver circa 150 new homes. The site benefits from excellent access to the motorway network, the Supertram at Crystal Peaks and create the critical mass for the proposed new railway station at Beighton as part of the re-opening of the Barrow Hill Line to Chesterfield.

**10.9** The deliverability and benefits of the site at Starbuck Farm is as follows:



Deliverability

**10.10** The site at Starbuck Farm provides a development opportunity that is available, suitable and achievable and therefore it is considered that the site is deliverable, in accordance with national planning policy and guidance. It is promoted by AAA Property Group who have a successful track record in the industry delivering, which further demonstrates the site's deliverability within the plan period

Availability

**10.11** The development proposals are being promoted by AAA Property Group, who have a legal agreement with the landowners of Starbuck Farm to allow the land to be brought forward for development.

- 10.12** AAA Property Group are a well- funded developer with a strong demonstrable track record of delivery of development and investment in the north of England. They are committed to develop the site and have appointed a technical team.
- 10.13** The land is therefore “available” in accordance with the Framework and the Planning Practice Guidance (PPG)

Suitability

- 10.14** The core objectives of the Framework are sustainable development and growth. The Framework is explicit that planning should help create the conditions in which businesses can invest, expand and adapt. The key focus is to create the conditions for sustainable economic growth.
- 10.15** The attached Advocacy Report has shown that the site provides a unique opportunity to create a sustainable residential scheme. The Beighton site lies partly within and partly adjacent to the Sheffield Urban Area. The site is close to facilities and services in Beighton and at Crystal Peaks. The site is also accessible to employment opportunities in the area, including Holbrook Industrial Estate and ERGO Park.
- 10.16** A number of bus services operate adjacent to the site. The Sheffield Supertram blue line has a stop at Crystal Peaks. The reopening of Beighton railway station would also make the site accessible to wider regional and national markets.
- 10.17** The M1 motorway is also close to the site and provides a positive link to the wider region for new residents, new staff, and customers and there is a strong labour market catchment that the site will benefit from. The nearby businesses will also benefit from the new homes.
- 10.18** The development will also create opportunities for the improvement of green corridor routes and green spaces within the site and enhancing opportunities to access the green network nearby. This will provide opportunities for recreation for employees and local residents.
- 10.19** Although the land is partly within the Green Belt it provides a unique and well connected opportunity for development immediately adjacent to Crystal Peaks, services and facilities and accessible to the M1 Motorway.
- 10.20** The Framework considers that Green Belt boundaries can change “in exceptional circumstances”. Such a circumstance exists through the significant need to provide for housing in Sheffield. The evidence for such a use and the context for Green Belt change stems from the city region and council’s economic strategy which seek to grow the economy, attract inward investors and diversify the employment base.
- 10.21** The proposed development would be delivered to a high quality design standard which respects the nature of the surrounding area and setting with the inclusion of screening. The development would not detrimentally affect the recreational opportunities that the Green Belt has to offer. Therefore, although the site is in the Green Belt is a logical scheme with significant major benefits. It is therefore considered that the proposed allocation of the site is suitable, in accordance with national guidance.

**10.22** Technical work that underpins the masterplan confirms that there are no known constraints to development it is therefore considered that the proposed allocation of the site is suitable in accordance with national guidance.

**10.23** The site and proposals are therefore “suitable” in accordance with the Framework and PPG.

#### Achievability

**10.24** A range of technical work is being undertaken and further survey work is ongoing. From the initial assessments there are no technical issues that would prevent development or are insurmountable and could not be suitably mitigated.

**10.25** The technical work undertaken has informed the indicative masterplan. The indicative masterplan shows how a mix of housing could be accommodated within the site, alongside Public Open Space, landscaping and drainage features.

**10.26** The technical assessments will be submitted in due course and are available upon request. The site is therefore considered to be achievable and therefore deliverable in accordance with national guidance.

#### Effective Use of Land

**10.27** The site is partly within the Urban Area of Sheffield. The proposed development at Starbuck Farm is located within close proximity to existing services and facilities and benefits from excellent public transport connectivity. The scheme is therefore making an efficient and effective use of land and infrastructure.

#### Delivering a Flexible Supply of Housing

**10.28** The Framework requires Local Planning Authorities to meet their full objectively assessed housing need. AAA Property Group considers that the site at Starbuck Farm, Beighton is deliverable in the short and will reinforce the housing supply and address the Borough’s housing needs in the early periods of the Local Plan. Development of this site will support the delivery of a range of housing types and contribute towards meeting identified needs.

#### A Positive Response to the Key Objectives of the Framework

**10.29** The Framework sets out that the Governments key housing policy goal of significantly boosting the supply of housing and proactively driving and supporting sustainable economic development to deliver homes, business and industrial units, infrastructure and thriving local places that the country needs. The Framework explains that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as extensions to towns, and creating mixed and sustainable communities with good access to jobs, key services and infrastructure. Sites should also make effective use of land and existing infrastructure.

**10.30** In relation to the Framework:

- The proposal responds positively towards national guidance.

- The site is appropriate for accommodating housing growth, being an expansion of an existing settlement.
- The proposed site is accessible to existing employment local community facilities, infrastructure and services, including public transport.
- The site has been assessed as being available, suitable and achievable for development
- The proposed site is accessible to existing local community facilities, national and local infrastructure services and public transport including rail.
- The site can be developed without adverse impact upon the Green Belt Openness and purposes.

#### Benefits of Starbuck Farm

**10.31** The development of the site would provide significant economic, social and environmental benefits. The site would provide housing that would meet the needs of the Sheffield housing market. Therefore this site provides a unique opportunity in a sustainable location and without compromising the Green Belt function and purpose.

**10.32** In accordance with the Framework this representation has shown that:

- The site is suitable for housing and can deliver circa 150 new homes.
- The proposal can provide a good mix of housing commensurate to the demand and need in the area.
- The site is located in close proximity to existing community facilities and retail facilities, including Crystal Peaks and schools.
- Well served by bus routes and the Supertram and can create the critical mass for the new Beighton railway station.
- Access to the motorway network through junction 31 of the M1
- Close to employment opportunities
- The scheme uses land efficiently and effectively.
- The proposal is in line with planning for housing objectives.
- The proposal will deliver public open space with opportunity to create a green route through the site connecting to existing Green Links, and existing public rights of way.
- The scheme will create direct and indirect job opportunities both during and after construction

**10.33** The proposal is an appropriate site to provide for the housing needs of Sheffield in the short term. Confirmation of the allocation will contribute positively to a balanced housing supply in the City in sustainable locations. The site can deliver a full range and mix of housing as part of a sustainable community. Development of the site would deliver affordable housing. Sheffield needs to have a robust housing trajectory with a sufficient supply of deliverable sites. The site at Starbuck Farm, Beighton will assist with this delivery in the short term. The site is situated within a prime location

suitable for residential development and as such would facilitate the development of land in an effective and efficient manner. Development of the site would not harm or undermine the area's wider policy objectives, but seeks to reinforce the need to develop sites within sustainable locations as a priority.

**10.34** The proposal is an appropriate site to provide for the employment needs of the Plan area in the short term. The site is available, suitable and achievable and therefore deliverable in accordance with the Framework.

**10.35** Further deliverability evidence will be submitted in due course

## Proposed Change

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**10.36** To overcome the objection and address soundness matters, the following changes are proposed:

- Update Spatial Strategy to address the evidence base and meet the identified housing needs.
- Allocate the site at Starbuck Farm, Beighton for housing use.

# 011 Policy SA6

## Policy SA6: South Sheffield Sub-Area

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11.1 The South Sheffield Sub-Area sites will not meet the identified need.

### Justification

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11.2 This Sub-Area includes 765 new homes. However, as highlighted earlier there is very little evidence on the deliverability of the sites allocated.

11.3 As stated earlier this is evidenced within the start of the housing chapter the difficulties with the housing supply over the Plan period, stating that “there is not yet sufficient evidence to show it is deliverable before 2029” and that “public intervention will be needed to enable much of the former employment land to transition to sustainable, desirable residential areas” and that “many of the potential development sites have multiple owners” and there is a need for financial support from the Government.

11.4 AAA Property Group have analysed the potential housing supply, as summarised in response to Policy SP1 and a summary table attached at Appendix 1. This area includes site SS17: former Norton Aerodrome for circa 280 new homes on part of the site, which will be released from the Green Belt.

11.5 AAA Property Group therefore considers that the strategy should be developed to meet the identified needs and should be developed in such a manner that does not prevent the delivery of other sustainable sites or sustainable developments.

### Proposed Change

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11.6 To overcome the objection and address soundness matters, the following changes are proposed:

- Update Spatial Strategy to address the evidence base and meet the identified housing needs.

- Allocate the site at Starbuck Farm, Beighton for housing use.



# 012 Policy SA7

## Policy SA7: Southwest Sheffield Sub-Area

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12.1 The Southwest Sheffield Sub-Area sites will not meet the identified need.

### Justification

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12.2 This Sub-Area includes 755 new homes. However, as highlighted earlier there is very little evidence on the deliverability of the sites allocated.

12.3 As stated earlier this is evidenced within the start of the housing chapter the difficulties with the housing supply over the Plan period, stating that “there is not yet sufficient evidence to show it is deliverable before 2029” and that “public intervention will be needed to enable much of the former employment land to transition to sustainable, desirable residential areas” and that “many of the potential development sites have multiple owners” and there is a need for financial support from the Government.

12.4 AAA Property Group have analysed the potential housing supply, as summarised in response to Policy SP1 and a summary table attached at Appendix 1.

12.5 AAA Property Group therefore considers that the strategy should be developed to meet the identified needs and should be developed in such a manner that does not prevent the delivery of other sustainable sites or sustainable developments.

### Proposed Change

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12.6 To overcome the objection and address soundness matters, the following changes are proposed:

- Update Spatial Strategy to address the evidence base and meet the identified housing needs.
- Allocate the site at Starbuck Farm, Beighton for housing use.

# 013 Policy SA8

## Policy SA8: Stocksbridge/Deepcar Sub-Area

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13.1 The Stocksbridge/Deepcar Sub-Area sites will not meet the identified need housing.

### Justification

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13.2 This Sub-Area includes 928 new homes. However, as highlighted earlier there is very little evidence on the deliverability of the sites allocated.

13.3 As stated earlier this is evidenced within the start of the housing chapter the difficulties with the housing supply over the Plan period, stating that “there is not yet sufficient evidence to show it is deliverable before 2029” and that “public intervention will be needed to enable much of the former employment land to transition to sustainable, desirable residential areas” and that “many of the potential development sites have multiple owners” and there is a need for financial support from the Government.

13.4 AAA Property Group have analysed the potential housing supply, as summarised in response to Policy SP1 and a summary table attached at Appendix 1. This shows for example sites SD03 where there is no evidence of availability. The site has an expired permission and is an ex-steel works site. The site could have come forward previously and there are therefore likely to be contamination and viability issues.

13.5 AAA Property Group therefore considers that the strategy should be developed to meet the identified needs and should be developed in such a manner that does not prevent the delivery of other sustainable sites or sustainable developments.

### Proposed Change

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13.6 To overcome the objection and address soundness matters, the following changes are proposed:

- Update Spatial Strategy to address the evidence base and meet the identified housing needs.
- Allocate the site at Starbuck Farm, Beighton for housing use.

# 014 Policy SA9

## Policy SA9: Chapeltown/High Green Sub-Area

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14.1 The Chapeltown/High Green Sub-Area sites will not meet the identified need for housing.

### Justification

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14.2 This Sub-Area includes 25 new homes. However, as highlighted earlier there is very little evidence on the deliverability of the sites allocated.

14.3 As stated earlier this is evidenced within the start of the housing chapter the difficulties with the housing supply over the Plan period, stating that “there is not yet sufficient evidence to show it is deliverable before 2029” and that “public intervention will be needed to enable much of the former employment land to transition to sustainable, desirable residential areas” and that “many of the potential development sites have multiple owners” and there is a need for financial support from the Government.

14.4 AAA Property Group have analysed the potential housing supply, as summarised in response to Policy SP1 and a summary table attached at Appendix 1.

14.5 AAA Property Group therefore considers that the strategy should be developed to meet the identified needs and should be developed in such a manner that does not prevent the delivery of other sustainable sites or sustainable developments.

### Proposed Change

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14.6 To overcome the objection and address soundness matters, the following changes are proposed:

- Update Spatial Strategy to address the evidence base and meet the identified housing needs.
- Allocate the site at Starbuck Farm, Beighton for housing use.

# 015 Policy H1

## Policy H1: Scale and Supply of New Housing

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- 15.1 AAA Property Group consider that Policy H1 will not deliver the housing need and does not reflect the evidence base, national policy and guidance and is therefore unsound.

### Justification

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- 15.2 Policy H1 states that the delivery of new homes will be in accordance with Policies SP1 and SP2 and be primarily on previously developed sites in the urban area. However, as stated earlier in response to Policies SP1 and SP2, AAA Property Group do not consider this strategy to meet the identified housing needs over the Plan period.
- 15.3 Part c) of the policy states that new housing will be delivered on sites that already have planning permission, on housing allocations, in broad locations for growth and through windfalls. However, as stated in response to Policy SP1, AAA Property Group have analysed the proposed sites and consider that there are significant constraints and that the Local Plan is deficient in its housing provision.
- 15.4 Further to our comments in response to Policy SP1 Part c) also states that windfalls will form part of the housing provision, but there is little evidence to support this, especially when the Spatial Strategy is one of urban concentration and the brownfield sites are largely allocated for housing or employment and that the employment strategy is based on recycling employment sites. AAA Property Group do not consider that there will be many windfall sites and that a full appropriate provision of housing should be identified.
- 15.5 The need for affordable housing is also significant and part e) suggests that the housing requirement incorporates this need. As highlighted earlier in response to Policy SP1, AAA Property Group consider that the housing requirement needs to increase to account for this need.
- 15.6 Similar to our comments to Policy SP1, AAA Property Group notes that the Council has identified Broad Locations within the Urban Area for future growth. However, as stated in the supporting text “there is not yet sufficient certainty to allocate all the land that is potentially suitable for housing in these areas”. These areas require relocation of uses, land assembly and new infrastructure. These sites are long term and cannot be relied upon. AAA Property Group considers appropriate

housing sites should be identified to deliver the requisite number of homes for the full Plan period. Furthermore, the equivalent long term sites should be identified in the Green Belt. In accordance with the Framework safeguarded land for longer term development needs should be identified and which can be released as a resource to ensure the housing needs of the City are met.

## Proposed Change

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15.7 To overcome the objection and address soundness matters, the following changes are proposed:

- Update Spatial Strategy to address the evidence base and meet the identified housing needs.
- Identify safeguarded land sites.
- Allocate the site at Starbuck Farm, Beighton for housing use.

# 016 Policy ES1

## Policy ES1: Measures required to achieve Reduced Carbon Emissions in New Development

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- 16.1 AAA Property Group supports the reduction in carbon emissions, however policies should be flexible and reflect national policy and guidance.

### Justification

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- 16.2 Policy ES1 stipulates the measures that should be incorporated into new developments to achieve a reduction in carbon emissions in new developments.
- 16.3 However, it is unclear from the Viability Appraisal how the additional costs have been incorporated into the assessment and where the evidence is derived from. Therefore, the evidence supporting the Plan does not robustly support the policy approach and the potential implications for development, which are mostly urban brownfield sites.
- 16.4 The Viability Appraisal provides a number of percentage cost increases to incorporate into residential schemes and then states “it is clear from a range of data sources that the additional costs will vary tremendously depending on the specifics of the building under consideration”. It is therefore unclear what cost has been incorporated for Policy ES1.
- 16.5 Policy ES1 requires further evidence and be fully justified in relation to implications for potential development schemes.

### Proposed Change

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**16.6** To overcome the objection and address soundness matters, the following changes are proposed:

- Update evidence.
- Incorporate flexibility.



# 017 Policy ES2

## Policy ES2: Renewable Energy Generation

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- 17.1 AAA Property Group supports the reduction in carbon emissions, however policies should be flexible and reflect national policy and guidance.

### Justification

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- 17.2 Policy ES2 expects the use of low-carbon energy sources in new developments. However, the Viability Appraisal only assesses solar panels.
- 17.3 There is no assessment on residential schemes and other forms of energy generation and therefore the implications for the delivery of sites, which are mostly brownfield urban schemes.
- 17.4 Policy ES2 requires further evidence and be fully justified in relation to implications for potential development schemes.

### Proposed Change

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- 17.5 To overcome the objection and address soundness matters, the following changes are proposed:
- Update evidence.
  - Incorporate flexibility.

# 018 Policy ES3

## Policy ES3: Renewable Energy Networks and Shared Energy Schemes

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- 18.1 AAA Property Group welcomes the ambitions to reduce carbon emissions. However, Policy ES3 requires flexibility to be in accordance with the Framework.

### Justification

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- 18.2 Policy ES3 states that new schemes will be required to connect to District Energy Networks will, where feasible, and for significant new developments to prepare a feasibility assessment for establishing a new network.
- 18.3 The Viability Appraisal assesses £5,000 per unit for housing and £3,000 per unit for flatted developments. However, there is little justification or evidence for these assumed costs and the Viability Appraisal states that there are few published costs.
- 18.4 The Framework at paragraph 16 point d) states that Plans should: *“contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.”* It is clear then that policies should be clear and make sense to decision makers. The current wording of this policy should therefore be amended to incorporate flexibility.

### Proposed Change

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- 18.5 To overcome the objection and address soundness matters, the following changes are proposed:
- Amend the policy to incorporate flexibility.

# 019 Policy ES4

## Policy ES4: Other Requirements for the Sustainable Design of Buildings

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- 19.1 AAA Property Group supports the reduction in carbon emissions, however policies should be flexible and reflect national policy and guidance.

### Justification

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- 19.2 Policy ES4 requires, where relevant, to maximise the incorporation of sustainable design features, including green, blue or brown roofs. The terminology of the policy is vague “expected to maximise” and “as relevant” and should be amended to be clear, especially to maximise but only where relevant.
- 19.3 The Framework at paragraph 16 point d) states that Plans should: *“contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.”* It is clear then that policies should be clear and make sense to decision makers. The current wording of this policy is unclear and vague and should therefore be amended to be clear and incorporate flexibility.
- 19.4 Furthermore, the Viability Appraisal does not appear to include sufficient provision for Policy ES4. It only appears to consider green roofs and makes only a small percentage allowance for housing and flatted schemes.
- 19.5 Therefore, there is no evidence supporting the policy approach or an assessment of its implications, especially in a Local Plan that is focussed on brownfield urban sites.

### Proposed Change

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**19.6** To overcome the objection and address soundness matters, the following changes are proposed:

- Update evidence.
- Amend policy to for clarity purposes.
- Incorporate flexibility.

# 020 Policy NC3

## Policy NC3: Provision of Affordable Housing

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20.1 AAA Property Group does not consider Policy NC3 accords with national policy and guidance.

### Justification

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- 20.2 Policy NC3 states that a contribution towards the provision of affordable housing will be required from sites with the capacity of 10 or more dwellings.
- 20.3 The policy then continues indicating a minimum requirement ranging from 10% to 30% dependent on the affordable housing market area. It also sets the affordable housing tenure mix, which should be 25% First Homes, 25% social rent or equivalent affordable tenures and 50% affordable rent or housing for intermediate or equivalent affordable tenures.
- 20.4 AAA Property is concerned, as highlighted in response to Policy SP1 that the affordable housing need will not be met in the City and the proposed housing requirement and Spatial Strategy is insufficient.
- 20.5 The Sheffield and Rotherham SHMA (July 2019) identifies an annual shortfall in affordable units of 902 dwellings in Sheffield, it also recommends as a guideline of 25% of units could be shared ownership, affordable rent or other intermediate products. It suggests that the majority of affordable homes should be homes for social rent.
- 20.6 However, the Sheffield Whole Plan Viability Appraisal identified viability issues in Sheffield. The Viability Appraisal states that when assessed under the methodology set out in the PPG development in the Central Area, East and North East is unviable. The Appraisal also states that Private Rented Schemes are unviable. The Appraisal also states that the Council should be cautious about relying on development in the Central Area, and East and North East and on brownfield sites in the Urban West, Stocksbridge/Deepcar, and Rural Upper Don Valley and Chapelton/Ecclesfield areas to deliver its housing requirement.
- 20.7 AAA Property Group supports the need to address the affordable housing requirements of the City. However, the Framework is clear that the derivation of affordable housing policies must not only take account of need but also viability and deliverability. The Council should be mindful that it is unrealistic to negotiate on a site-by-site basis because the base-line aspiration of a policy or

combination of policies is set too high as this will jeopardise future housing delivery. The Viability Appraisal highlights the issues with viability in the area, and the conclusions highlight the challenges faced by the Council in terms of preparing policy and for developers providing the full policy requirements.

- 20.8 The Framework is also clear that where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership. AAA Property Group is concerned that evidence is not available to demonstrate this and the proposed policy may not deliver this requirement.
- 20.9 AAA Property Group consider that further sites are needed to be identified to meet the affordable housing needs in the City.

## Proposed Change

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20.10 To overcome the objection and address soundness matters, the following changes are proposed:

- Provide evidence and clarification
- Amend the policy to incorporate flexibility.
- Allocate the site at Starbuck Farm, Beighton for housing use.

# 021 Policy NC5

## Policy NC5: Creating Mixed Communities

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21.1 AAA Property Group does not consider Policy NC5 accords with national policy and guidance.

### Justification

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- 21.2 Policy NC5 requires that development of 30 or more dwellings in the City Centre and other highly accessible locations that no more than half the homes consist of one-bedroom apartments and studios. It also requires a greater mix of house types on developments of 30 or more dwellings in other locations to include homes for larger households.
- 21.3 AAA Property Group understands the need for a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the local area.
- 21.4 The Framework at paragraph 16 point d) states that Plans should: *“contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.”* It is clear then that policies should be clear and make sense to decision makers. The current wording of this policy should therefore be amended to incorporate flexibility.
- 21.5 AAA Property Group recommends a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site. Such an approach would ensure that the scheme is viable and provides an appropriate mix for the location and market.

### Proposed Change

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- 21.6 To overcome the objection and address soundness matters, the following changes are proposed:
- Amend the policy to incorporate flexibility.

# 022 Policy NC8

## Policy NC8: Housing Space Standards

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22.1 AAA Property Group does not consider Policy NC8 accords with national policy and guidance.

### Justification

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- 22.1 Policy NC8 states that all new housing should comply with the Government's nationally described space standards and any subsequent updates. This is verified in the supporting text which states that all new housing should comply with the optional nationally described space standards as well as the provision for outdoor amenity space.
- 22.2 AAA Property Group would like to highlight that any policy seeking to implement national space standards for new homes needs to be accompanied by appropriate justification and evidence. The enhanced standards, as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a 'need to have' rather than a 'nice to have' basis. PPG (ID 56-020) identifies the type of evidence required to introduce such a policy.
- 22.3 AAA Property Group is generally supportive of providing homes that are suitable to meet the needs of older or disabled people. However, there needs to be appropriate evidence and suitable flexibility in the policy to address site specific considerations, including topography and flood risk/drainage. Such site specific factors is in accordance with national policy and guidance.
- 22.4 Furthermore, if the Council wishes to adopt the higher optional standards for accessible and adaptable homes the Council should only do so by applying the criteria set out in the PPG. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability.
- 22.5 In preparing such a policy the Council should also be aware that the Government is seeking to raise accessibility standards through Building Regulations to M4(2) as a minimum for all new homes.



22.6 AAA Property Group is concerned with regards to the interaction of this policy with other policies in the emerging Local Plan and the ability for sites to accommodate the aspired number of new homes. AAA Property Group consider that further sites are needed to be identified to deliver the requisite number of homes in the Plan.

## Proposed Change

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22.7 To overcome the objection and address soundness matters, the following changes are proposed:

- Provide evidence and clarification.
- Amend the policy to incorporate flexibility.
- Allocate the site at Starbuck Farm, Beighton for housing use.

# 023 Policy NC9

## Policy NC9: Housing Density

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- 23.1 AAA Property Group is concerned that the interaction of this policy with other policies in the Plan shows that this policy is inconsistent with the Spatial Strategy and the Plan is unsound.

### Justification

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- 23.2 Policy NC9 establishes the density requirements for different areas of the City, which ranges from 70 dwellings per hectare (dph) within or near to the Central Area, 50 to 80dph within or near to District Centres, 40 to 70dph within easy walking distance of tram stops and high frequency bus routes, 30 to 50dph in remaining parts of the urban area and 30 to 40dph in the rural areas. It allows for exceptions to these requirements to reflect the character of a Conservation Area or to protect a heritage asset, to create different density character areas on larger development sites or are necessary to protect an environmentally sensitive area.
- 23.3 AAA Property Group consider that flexibility is important to this policy, as its interaction with other policies in the Plan, such as on site Public Open Space, green and blue infrastructure, tree planting, BNG, residential space standards will all affect potential housing densities.
- 23.4 AAA Property Group suggest that further flexibility is incorporated and a review of densities occurs in terms of potential housing provision within the proposed Plan. AAA Property Group suggest that further sites are needed to be identified to address the reduction in potential homes due to the interaction of policies.
- 23.5 The Framework at paragraph 16 point d) states that Plans should: *“contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.”* It is clear then that polices should be clear and make sense to decision makers. The current wording of this policy should therefore be amended to incorporate flexibility.

### Proposed Change

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**23.6** To overcome the objection and address soundness matters, the following changes are proposed:

- Amend the policy to incorporate flexibility.
- Allocate the site at Starbuck Farm, Beighton for housing use.

# 024 Policy GS6

## Policy GS6: Biodiversity Net Gain

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- 24.1 AAA Property Group is concerned that Policy GS6 does not accord with national policy and guidance and is therefore unsound.

### Justification

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- 24.2 Policy GS6 states that a minimum of 10% gain from pre to post development must be achieved for all habitat types evident on site. Furthermore, Policy GS6 sets out criteria for where in excess of a 10% net gain may be required.
- 24.3 Stem d) of Paragraph 174 of the Framework states that planning policies should “minimise impacts on and provide net gains for biodiversity”. If a development delivers the 10% minimum requirement by law it will ensure that paragraphs 174(d) of the Framework is addressed as it will ensure a net gain. As such any level above this is not necessary to make a development acceptable in planning terms and cannot be made a requirement in the Local Plan. Therefore, AAA Property Group does not consider that requiring Biodiversity Net Gain above a minimum of 10% meets the tests set out in paragraph 57 of the Framework.
- 24.4 As the Government note on page 9 of their response to the consultation on Biodiversity Net Gain, they considered 10% to deliver the right balance between “ambition, achieving environmental outcomes, and deliverability and cost to developers”.
- 24.5 AAA Property Group consider it should be for the developer to decide whether they go beyond 10%. This is a position the Government also supports stating on page 9 of their response to the consultation on net gain that the 10% should not be a cap on the aspirations of developers who want to go further “voluntarily”. It is important to remember that it is impossible to know what the cost of delivering net gain is until the base level of biodiversity on a site is known and consequently what is required to achieve a 10% net gain. On some sites this may be achievable on site with no reduction in developable area, for others it may require a large proportion of it to be addressed offsite, or a significant reduction in the developable area.
- 24.6 AAA Property Group therefore considers Policy GS6 should be amended to achieve only a 10% Biodiversity Net Gain.

## Proposed Change

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24.7 To overcome the objection and address soundness matters, the following changes are proposed:

- Amend Policy GS6 to only achieve a 10% Biodiversity Net Gain.

# 025 Policy GS7

## Policy GS7: Trees, Woodlands and Hedgerows

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- 25.1 AAA Property Group is concerned that Policy GS7 is requiring significant new tree planting, which could affect the delivery of developments on tightly constrained urban sites.

### Justification

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- 25.2 Policy GS7 requires 1 tree per dwelling. AAA Property Group supports Green and Blue Infrastructure and the need for further tree planting. However, the interaction of this policy alongside the need to deliver significant new housing on urban brownfield and recycled sites may render some sites undeliverable.
- 25.3 AAA Property Group considers that such ambitions for new tree planting as part of Biodiversity Net Gain can only be achieved through larger sites.
- 25.4 AAA Property Group is concerned with regards to the interaction of this policy with other policies in the emerging Local Plan and the ability for sites to accommodate the aspired number of new homes. AAA Property Group consider that further sites are needed to be identified to deliver the requisite number of homes in the Plan.
- 25.5 AAA Property Group therefore considers that their site at Starbuck Farm, Beighton should be allocated for housing purposes.

### Proposed Change

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- 25.6 To overcome the objection and address soundness matters, the following changes are proposed:

- Amend policy to be less prescriptive.
- Allocate the site at Starbuck Farm, Beighton for housing use.

# 026 Policy DC1

## Policy DC1: The Community Infrastructure Levy (CIL) and Other Developer Contributions

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- 26.1 AAA Property Group is concerned that the evidence base and the Viability Appraisal has limited information in relation to the assessment of Policy DC1.

### Justification

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- 26.2 Policy DC1 states that non-residential schemes will be required to contribute to transport infrastructure in accordance with Policy CO1 towards flood mitigation measures in accordance with Policy GS9.
- 26.3 The Viability Appraisal states that £1,500 per residential unit has been assumed for contributions towards infrastructure, which was provided in an email in April 2019 (according to footnote 66). AAA Property Group is concerned that there is no supporting evidence for this assertion or how it was derived.
- 26.4 AAA Property Group considers that further evidence is required and be consulted upon in relation to the Viability Appraisal.
- 26.5 Furthermore, Policy DC1 does not include flexibility in relation to viability-led planning applications in case there are changed circumstances or unknowns during the lifetime of the Plan. Such an approach is in full accordance with the Framework.

### Proposed Change

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- 26.6 To overcome the objection and address soundness matters, the following changes are proposed:



- Update evidence base.

# Appendix 1: Housing Site Analysis

Site Reference	Site Name	No. of Dwellings	Comments	Estimated 5YS	Developable
SV10	Land at Sylvester Street	108	No evidence of planning permission onsite. Only refused and withdrawn applications. No evidence of availability. Currently used as a car park.	0	No.
NWS12	Former British Glass Labs, Crookesmoor	76	There is a implemented consent on this site for 76 units from 2005. No evidence of availability or deliverability.	0	No.
SES12	Land at Vikinglea Drive	90	No Planning Permission. Site is unlikely to come forward quickly. Requirement to gain planning permission and site set up will delay delivery. Low priced market area. Allowance for one outlet.	45	Yes.
HC04	NCP Furnival Gate Car Park	100	No Planning permission. Risk of contamination. Existing car park and businesses may need to be relocated. There is a planning refusal onsite. No evidence to suggest that car parking is not required in this location – no plans for replacement car parking.	0	No.

Site Reference	Site Name	No. of Dwellings	Comments	Estimated 5YS	Developable
SU06	Site of 1-7 Allen Street	100	Planning appears to have expired. There are multiple ownerships across the site. There are existing businesses operating across the site.	0	No.
SV09	3-7 Sidney Street	117	No Planning permission in place. The site is currently used as a car park and there is no evidence of availability. There is no assessment of whether car parking is required in this location.	0	No.
ES27	Land at Kenninghall Drive	120	No planning permission in place. The site is unlikely to come forward quickly. Requirement to gain planning permission and site set up will delay delivery onsite. Low price market area. Allowance for one outlet.	45	Yes.
SV08	Mecca Bingo	121	No planning permission in place. Bingo Hall operating onsite. There is no evidence of availability. Therefore highly unlikely to come forward in the short term. Heritage assets in close proximity may reduce unit numbers.	0	No.
HC15	Land and Buildings at	136	No planning permission in place. There are businesses currently operating onsite. Heritage assets in proximity	0	No.

Site Reference	Site Name	No. of Dwellings	Comments	Estimated 5YS	Developable
	Fitzwilliam Street		to the site may reduce capacity further. Unlikely to come forward in the short term.		
ES25	Land to the North of Bawtry Road	147	No planning permission in place. The site is a former sports ground and gym. The surrounding area has a significant deficiency in terms of open space provision. There is no evidence of consultation with Sports England regarding the loss of sports pitches. There are heritage assets in close proximity to the site. The site is highly unlikely to come forward in the short term.	0	No.
SV07	Buildings at Shoreham Street	149	No planning permission in place. The Strategic Flood Risk Assessment shows that this site would have a Significant negative impact and therefore the suitability of the site is questioned. The site has issues relating to contamination which are yet to be resolved. There is no evidence of availability. Existing business uses onsite will need to be re-located.	0	No.
SES11	Manor Top Army Reserve Centre	151	No planning permission in place. Site is within a hazardous installation consultation zone. The site contains a historic landfill site. The site appears to	0	No.

Site Reference	Site Name	No. of Dwellings	Comments	Estimated 5YS	Developable
			currently be in use and the existing use will need to be relocated. There is no evidence of availability onsite.		
SES10	Land to the East of Moor Valley Road	151	No Planning permission in place. The site is in an ecologically important area (LWS). There may be archaeological remains to be recorded. Likely to be delay in delivery of this site.	0	Yes
NWS10	Land at Outbridge Lane	169	Planning permission for 80 dwellings but no delivery. Existing businesses still appear to be operating onsite and will require relocating. There are TPO's which will be affected by development here. Heritage assets and flood risk concerns may reduce capacity and delay delivery onsite.	0	Yes
SD03	Site A Stocksbridge Steelworks	190	Planning permission appears to be expired. No development work has begun. It is likely that there is significant contamination and land fill affecting the site. There is no recent evidence of availability	0	No.
KN03	Wickes, Rutland Road	191	No Planning permission in place. There is an existing Wickes Store operating	0	No.

Site Reference	Site Name	No. of Dwellings	Comments	Estimated 5YS	Developable
			onsite and therefore no evidence of availability.		
KN04	Land at Russel Street	200	No Planning permission in place. There are existing businesses operating onsite including a Gym and a Car Park. There is therefore no evidence of availability. There is a risk of contamination onsite which will likely delay delivery. There may be significant archaeological assets onsite which may delay delivery of units.	0	No.
ES24	Manor Sites 12/13	210	Planning permission in place. Development appears to have begun. One outlet therefore likely to be delivered at 30 dpa.	150	Yes.
HC13	999 Parcel Ltd	213	Planning permission in place. This only allows for 144 Apartments. Existing business operating from site. Likely to delay delivery.	144	Yes.
SU12	134 West Bar	216	No Planning Permission. The site is within multiple ownerships and businesses are currently operating from the site. There are heritage assets which will likely reduce the number of units delivered. There is a risk of contamination onsite. There is no evidence of availability.	0	No.

Site Reference	Site Name	No. of Dwellings	Comments	Estimated 5YS	Developable
SES09	Former Newstead Estate	218	Planning permission in place. Construction appears to have begun. One outlet will allow approximately 30 dpa.	150	Yes
SU08	Buildings at Scotland Street	225	No Planning permission in place. A number of businesses are currently operating onsite. There is a risk of contamination. There are heritage assets in close proximity to the site. The site is in multiple ownerships, there is no evidence of availability.	0	No.
SES28	Woodhouse East	258	No Planning permission in place. The site is likely to have significant ecological value. The site may contain best and most versatile agricultural land which may preclude development. The site is within close proximity to a landfill site. The site was allocated in the UDP and has yet to come forwards.	0	Yes.
SS17	Norton Aerodrome	270	No Planning permission in place. There are existing open space facilities onsite which should be retained. There is a likelihood of contamination onsite which will delay delivery of the site. There are heritage assets onsite which will be harmed by development. The site is likely to have ecological	0	Yes

Site Reference	Site Name	No. of Dwellings	Comments	Estimated 5YS	Developable
			value. The site is likely therefore to deliver a lower yield of houses.		
SES08	Land at Silkstone Road	272	No Planning permission in place. The site is likely to have significant ecological value which will reduce capacity. There is a risk of contamination which may delay delivery of units. Assume one outlet due to the size of scheme a sales rate of 30dpa plus two years to obtain planning permission and six months before the site begins delivering units onsite.	75	Yes
SV04	Decathlon Eye Street	303	No Planning permission in place. There is an existing Decathlon store operating onsite and therefore no evidence of availability. There are heritage assets in close proximity to the site which will reduce the site capacity or preclude development. There is a risk of contamination on site which may delay or preclude development.	0	No
CW09	Land to North of Derek Dooley Way	336	No Planning permission in place. This site is owned by National Grid and may still be required. There is no evidence of availability. The site is likely to be contaminated which may	0	Yes.



Site Reference	Site Name	No. of Dwellings	Comments	Estimated 5YS	Developable
			delay or preclude development. The development of this site will impact upon heritage assets which may mean the capacity of the site is reduced.		
SU04	Site of Former HSBC	355	Following initial demolition and preliminary work on foundations no progress has been made for several years. There are clearly deliverability issues affecting this site which may mean that the site will not come forward within the plan period.	0	No.
LR02	Buildings at Sheaf Gardens	367	No Planning permission in place. There are a number of existing businesses currently operating onsite which includes a Gym. There are a number of landownerships covering the site and no evidence of availability of the site to accommodate new accommodation.	0	No.
ES23	Globe II Business Centre 128 Maltravers Road	371	Planning permission is in place for 85 care home units on part of the site. The remaining part of the site has no planning permission and there is no evidence of availability. Site may be contaminated which will delay delivery. No proposal for apartment scheme. The	0	No

Site Reference	Site Name	No. of Dwellings	Comments	Estimated 5YS	Developable
			developer has confirmed no intention to develop the site.		
SD02	Former Steins Tip, Deepcar	428	Planning permission in place but delays to construction and delivery of units. Assume one outlet at 30 dpa will deliver units in the plan period.	150	Yes.
LR01	B & Q Warehouse Queens Road	466	No Planning Permission in place. There is currently a B&Q Store operating onsite and therefore no evidence of availability. The site is affected by flood risk. There is a risk of contamination onsite which may delay or preclude delivery.	0	No.
KN36	Land at Penistone Road	572	There is no planning permission in place. The site is currently vacant previously developed land. The site is likely to be contaminated which may delay or preclude delivery. There are multiple ownerships onsite and therefore no evidence that the site is available. This is a large site without planning permission and is therefore unlikely to deliver in the first five years of the plan period.	0	No.
ES22	Attercliffe Canalside	596	There is no planning permission in place. The site is within a hazardous installation consultation	0	Yes.

Site Reference	Site Name	No. of Dwellings	Comments	Estimated 5YS	Developable
			<p>zone. There are nearby heritage assets which will be impacted upon by the development and will reduce the sites capacity. This is a large scheme with significant constraints to overcome without planning permission in place and therefore is unlikely to deliver in the first five years of the plan.</p>		
HC08	Moorfoot Building	714	<p>The site is currently home to Sheffield City Council offices. There is no planning permission in place which demonstrates delivery. The site is potentially contaminated which may delay or preclude development. An underground National Grid Power cable runs underneath the site. There are areas of the site which are within flood risk zones. This site is currently in use as an office for the Council, it is large and does not currently have planning permission. Therefore, it is unlikely to be delivered in the plan period.</p>	0	No.
HC03	Land and Buildings at St. Mary's Gate	1006	<p>This site does not currently have planning permission. The site is within multiple ownerships and there is no evidence of the site being available. There are businesses currently operating onsite such as</p>	0	No.

Site Reference	Site Name	No. of Dwellings	Comments	Estimated 5YS	Developable
			<p>Office Outlet. The site is within an area of Flood Risk which may reduce the capacity of the site. There is a risk of contamination on site. This is a very large scheme without planning permission and is therefore unlikely to deliver units within the plan period.</p>		

# Appendix 2: Advocacy Report

(Bound Separately)

# be beighton valley's edge at home

Advocacy Report (February 2023)



# Development Benefits

## Environmental

	Improvement of landscaping and creation of public open space
	Enhanced and new habitats supporting a diversity of wildlife
	A sustainable location to use existing services to reduce reliance on the private car
	Creating new connection to wider habitat networks such as Shire Brook Valley and Beighton Marsh
	Creation of multi-use green space to bring people closer to nature

## Social

	Up to 280 new homes to meet the housing needs of Sheffield and the city region
	Encouraging active travel to sustainable transport options within Beighton
	Adjacent to the Shire Brook Nature Reserve allowing active travel to encourage healthy behaviours
	Adjacent to Beighton and Shire Brook allowing new residents to be part of the existing community
	700 direct construction jobs and approximately 1,000 indirect construction jobs within the supply chain

## Economic

	The new residents and employees will support existing facilities within Beighton
	Sustainable transport options connect the site to employment opportunities within the region supporting business growth
	Access to the motorway connecting the site to employment within the region supporting business growth
	Over £30m of Gross Value Added invested in the local economy.
	Supporting the delivery of a new railway station at Beighton

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# Introduction

**This document illustrates the vision for the Valley's Edge site, and seeks its allocation as a housing-led scheme within the emerging Sheffield local plan. The development is proposed to deliver new homes in a landscaped setting to meet the housing needs of Sheffield in a healthy environment.**

## **About AAA Property Group**

AAA Property Group are a West Yorkshire based business which is owned and operated by the Chima family. Spanning three generations they have a 50 year track record as major employers, developers and investors.

The family founded and built the Grange Moor based Bonmarché retail business comprising over 300 stores and employing 6,000+ people before it was sold to Peacock Group plc in 2002.

Today the family mandate is to invest and develop quality industrial, commercial and residential property throughout the north with significant investment already made in Lancashire, Calderdale, Kirklees and Leeds.

## **Beighton**

Valley's Edge creates a unique opportunity to locate housing in a sustainable location close to existing services, facilities and public transport routes. The proposed scheme can deliver high quality development within a landscaped setting adjacent to an existing green network, creating a healthy lifestyle and fostering innovation. The site can deliver significant benefits within the vision for economic growth that the city and region aspires to.

## **Scope**

This Advocacy Report sets out the context and ambitions for Valley's Edge before analysing and explaining the site's availability, suitability and achievability and therefore deliverability in the context of the National Planning Policy Framework (the Framework).

An indicative masterplan for the site will show the potential for the site including green and blue infrastructure, movement and connectivity. The proposal provides significant benefits which are explained throughout the report including the provision of a range and choice of new homes.



## Sustainable City Principles

(Sheffield's Green Commitment, Sheffield Green Commission, 2018)



**connected**  
**City**

low-emission  
affordable  
digitally connected  
clean  
integrated

The graphic features a blue background with a stylized tram and a cyclist. The word 'connected' is in large white letters, with 'City' below it. The 'C' in 'City' contains a silhouette of a family. Other terms are scattered around in various shades of blue.



**Transformative**  
**energy**

renewable  
secure city  
low-emission  
locally owned  
energy solutions

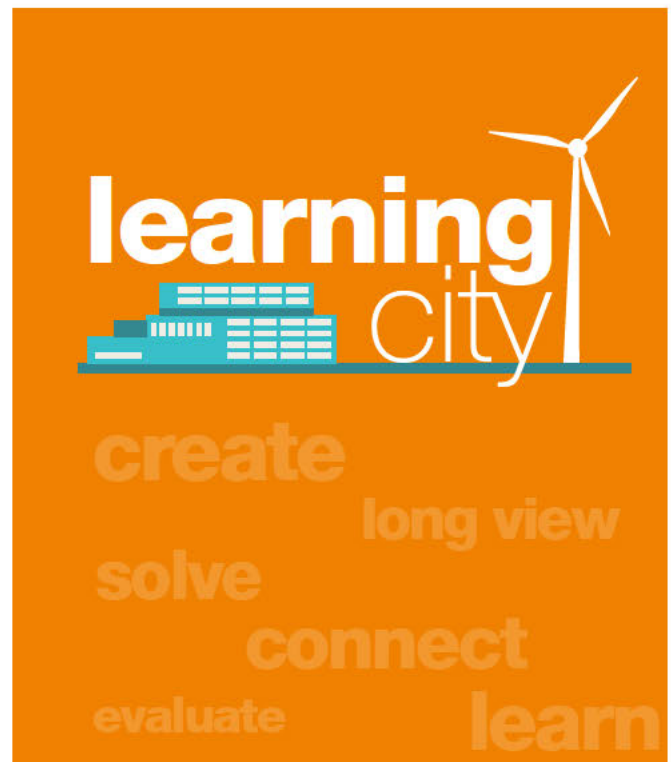
The graphic features a yellow background with icons of a solar panel, a wind turbine, a house, and a car. The word 'Transformative' is in white, and 'energy' is in large white letters. Other terms are scattered around in various shades of yellow.



**European**  
**green** City

attractive  
ecosystem  
sustainable  
outdoor city  
accessible

The graphic features a green background with icons of trees and a bench. The word 'European' is in white, and 'green' is in large white letters. 'City' is in smaller white letters. Other terms are scattered around in various shades of green.



**learning**  
**city**

create  
long view  
solve  
connect  
evaluate  
learn

The graphic features an orange background with icons of a building and a wind turbine. The word 'learning' is in large white letters, and 'city' is in smaller white letters. Other terms are scattered around in various shades of orange.

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## Why Beighton?

# A Crucial Part of a Sustainable City

**Valley's Edge provides a unique opportunity to deliver new housing within a landscaped setting close to green spaces, Sheffield Supertram, existing retail and employment (Crystal Peaks, Ergo Park and Holbrook Industrial Estate), the proposed reopened Beighton railway station and the M1 Motorway. The site is accessible to Sheffield City Centre and the wider region.**

The proposed scheme aims to deliver new homes within a sustainable location accessible to outdoor and indoor leisure spaces close to public transport nodes.

The proposed scheme aligns with Sheffield's objective of becoming a cleaner, greener city. The site strategy has taken its lead from the The Green City Strategy which aims to reduce the city's climate impact to zero carbon by 2050.

The strategy explains that the move towards a lower carbon and cleaner economy would enable the city to grow and evolve whilst at the same time improving the environment and the quality of life of the residents. Sustainability and climate change resilience is a priority for the strategy, which contains 12 priorities, including: reducing impact on the climate; a climate resilient city; sustainable and affordable energy; modern, reliable and clean journeys; clean air for all; and a green and innovative economy.

The Sheffield Green Commitment reflects a similar approach, which has been developed by the Sheffield Green Commissioners and has developed a vision of a sustainable city based on the following four principles:

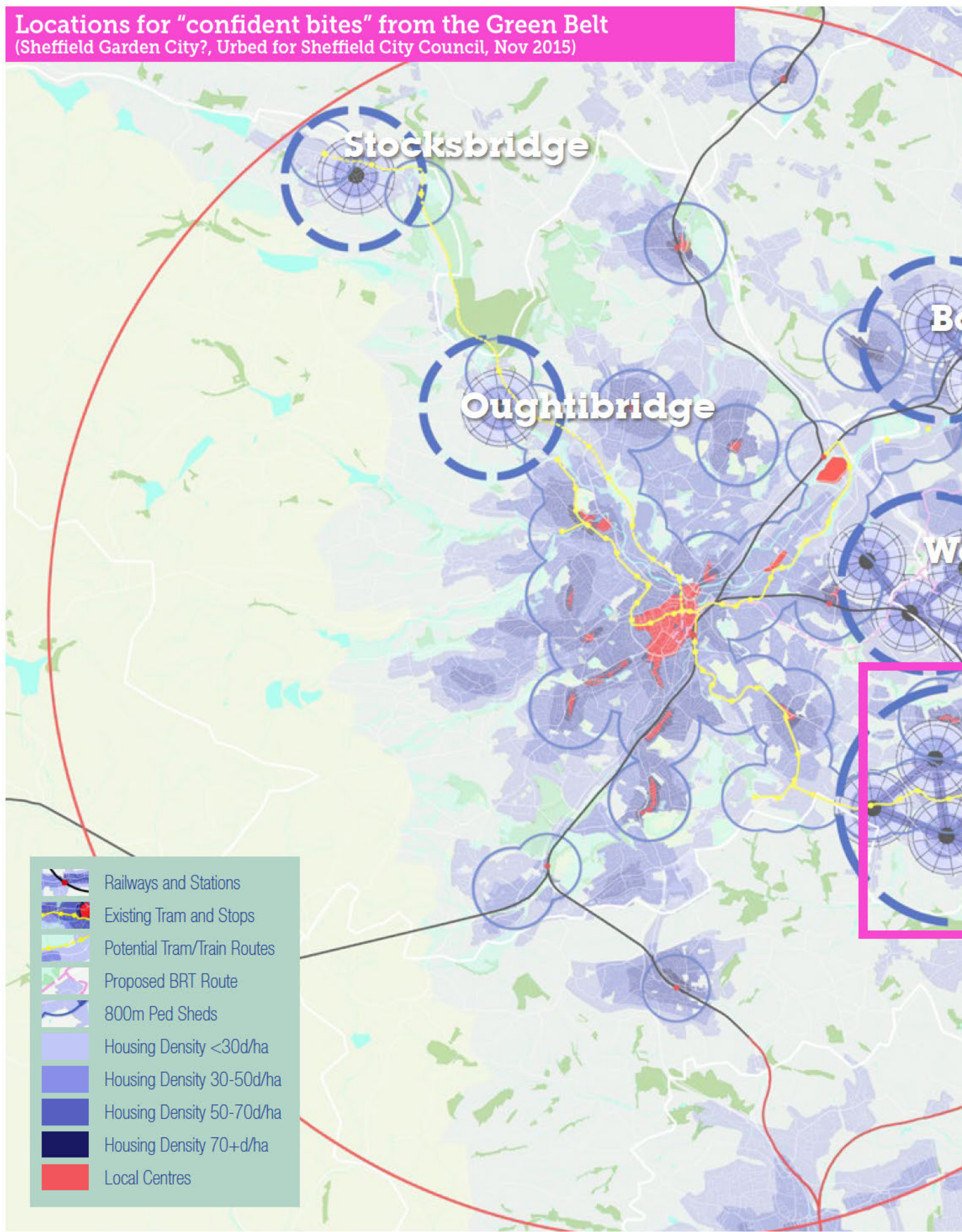
- **Connected City:** A city with transportation systems that are efficient and affordable, reliable and clean, simple and intuitive, networked and integrated, and low-emission.
- **Transformative Energy:** An energy secure city with transformative affordable, clean, efficient, low- mission, networked, renewable, resilient, simple and locally owned energy solutions.
- **European Green City:** Sheffield is a green city both in its urban core and its surrounding landscape and this is part of its attractiveness and distinctiveness. A city with an accessible, ambitious, bold, biodiverse, equitable and high-quality, well-designed formal and informal landscape that is sustainable to maintain and delivers a myriad of benefits.
- **Learning City:** Sheffield is committed to continuous learning about how to give the city a smart and sustainable future. This includes learning from and collaborating with other cities and education institutions.

These themes focus development towards sites that are accessible to employment, retail and leisure spaces, and also accessible to public transport routes. The themes also highlight opportunities for place making and place shaping and the creation of high quality and innovative employment.

The Beighton site proposals embody the themes and can facilitate the achievement of these goals. Importantly, the site is close to the Supertram route at Crystal Peaks, it is accessible to the M1 Motorway at Junction 31 and is adjacent to the Barrow Hill Line, which is potentially re-opening with a railway station at Beighton as part of the city region's Integrated Rail Plan. This alongside the ability to create new and enhanced green routes and the accessibility to green spaces close to the site creates a healthy environment for new and existing residents and workers.

# Locations for "confident bites" from the Green Belt

(Sheffield Garden City?, Urbed for Sheffield City Council, Nov 2015)



- Railways and Stations
- Existing Tram and Stops
- Potential Tram/Train Routes
- Proposed BRT Route
- 800m Ped Sheds
- Housing Density <30d/ha
- Housing Density 30-50d/ha
- Housing Density 50-70d/ha
- Housing Density 70+d/ha
- Local Centres





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## Why Beighton?

# Liberating the City Centre

The document *Sheffield Garden City? Options for long-term urban growth* (URBED, Nov 2015) indicates that employment space in the “shatter zone” on the edge of the city centre should be relocated for housing growth and that “confident bites” should be taken from the Green Belt.

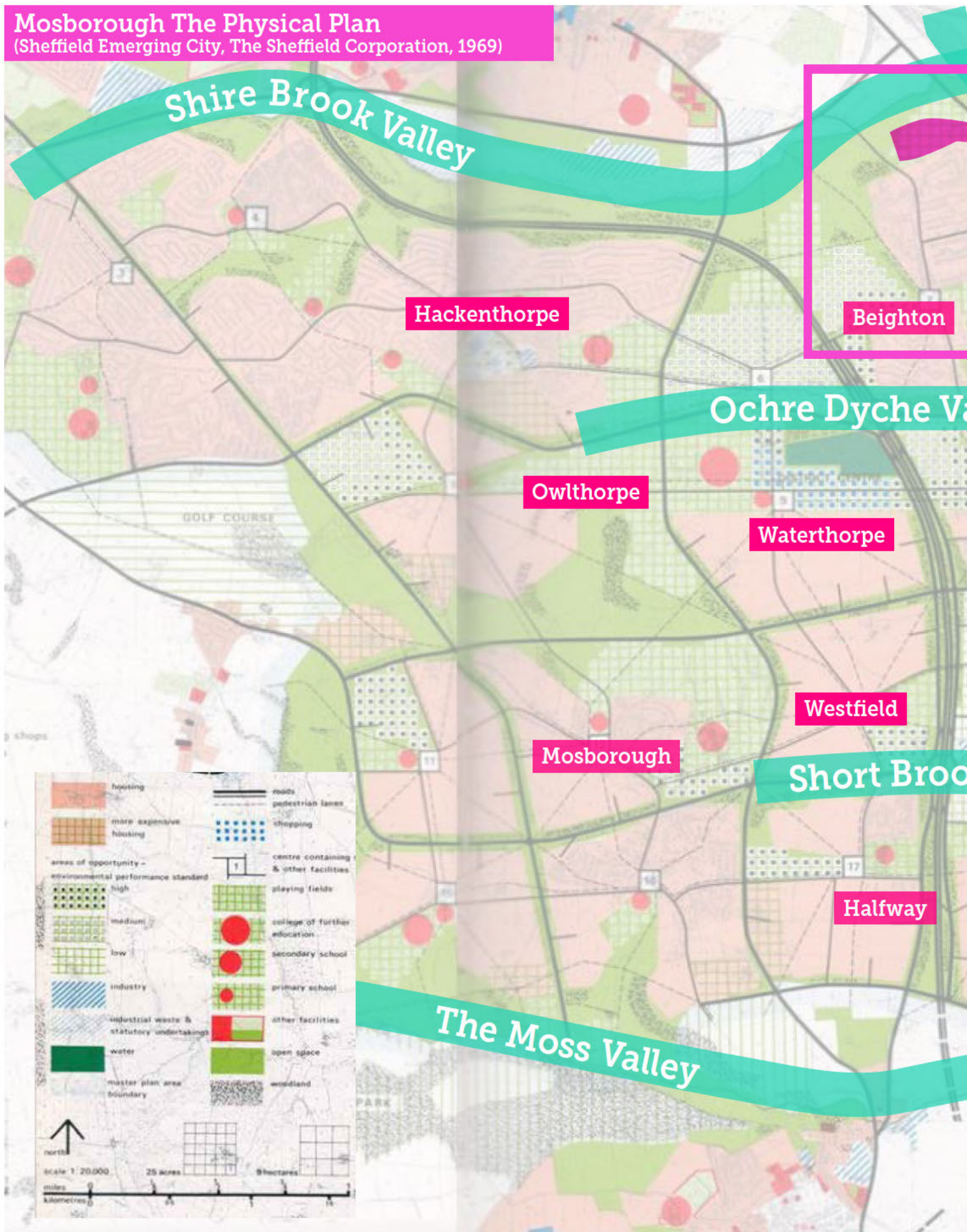
The “shatter zone” is described as industrial areas surrounding the centre of Sheffield. These areas are historically where the legacy industries of the city were established but sites like the Little Kelham development are demonstrating the value of encouraging urban living within walking distance of the city centre. In order to release more sites like this it will be necessary to relocate existing businesses to new premises. This intensification and remodelling of urban areas will therefore need to be facilitated by the extension of urban areas in sustainable locations (within 800m of existing facilities).

The *Sheffield Garden City? Options for long-term urban growth* document (URBED for Sheffield City Council, Nov 2015) indicates key areas within the city where a “confident bite” can be taken from the Green Belt. It suggests that this should be considered in a comprehensive way using the opportunity to provide new facilities, to encourage walking and cycling and to provide better quality and publicly accessible open space.

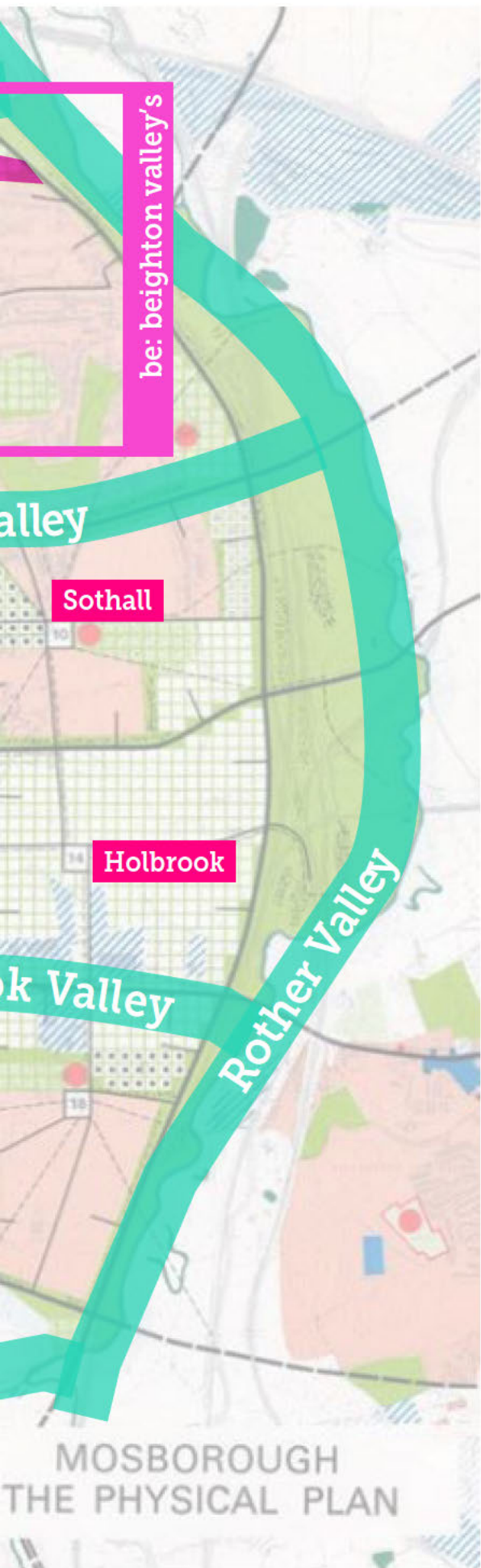
The Valley's Edge site meets with the above criteria as it is located within the Owlthorpe and Mosborough area identified for a “confident bite” to be taken from the Green Belt and within 800m of existing facilities and tram services. The sustainability of the site will improve further when the proposed Beighton railway station is delivered.

The site creates an opportunity to relocate employment uses thereby freeing up housing opportunities within the city centre alongside providing additional housing to support the growth of Sheffield and the city region.









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## Completing the Vision

# revealing theVales

## south-east sheffield

The Sheffield Townships were added to the city in 1967 to allow the “overspill” of the population and new industries. The population was planned to increase from 35,000 to 85,000. Sheffield - Emerging City (The Sheffield Corporation, 1969) summarises the proposals.

The proposals for the Sheffield Townships sought to create a green and healthy place to live on the edge of the city.

It followed the same principles of post-war new towns such as Milton Keynes, Warrington and Stevenage.

These principles sought to:

- Separate main vehicular routes from development.
- Provide green routes for pedestrian and cycle movement.
- Develop a grid system for navigation.
- Allow residents to live and work in the same area.
- Create attractive areas for recreation in close proximity.

Whilst The Physical Plan for Mosborough is diagrammatic it can clearly be seen what the masterplanners were seeking to achieve.

The routes of the valleys through the area were shown to be preserved and additional open and green space connections provided close to the growing towns.

The main highway links are shown within green-ways, separated from the adjacent development.

Pedestrian routes are indicated to link the development with local and district centres as well as the surrounding green spaces.



The Physical Plan - As Delivered  
(Image overlain on Google Earth) (Spawforths)







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## Completing the Vision

# revealing theVales south-east sheffield

Since their inception as a growth area for Sheffield the towns in the south-east have continued to see growth throughout the late 20th and early 21st Century with new housing, retail and employment.

The delivery of the new towns in south-east Sheffield has seen the proposals change from that illustrated in 'The Physical Plan' for Mosborough.

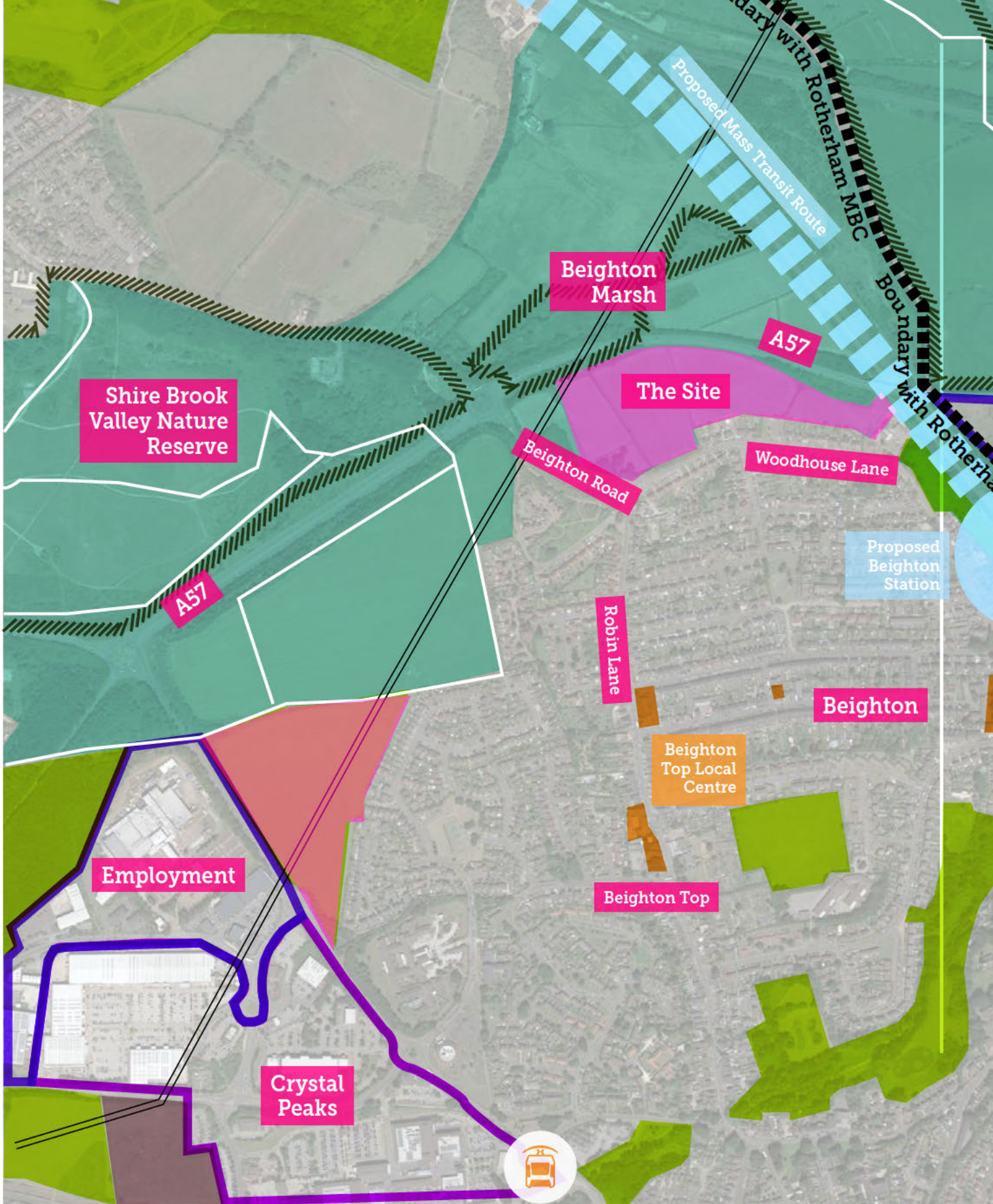
The A57 linking Sheffield Parkway in the north with the M1 Motorway in the east now provides a strong northern boundary to the area.

Crystal Peaks shopping centre forms the District Centre and the area has grown with a number of out-of-town retail units developed to the north. These facilities serve a wider area than the towns within the plan attracting users from Sheffield, Rotherham and further afield.

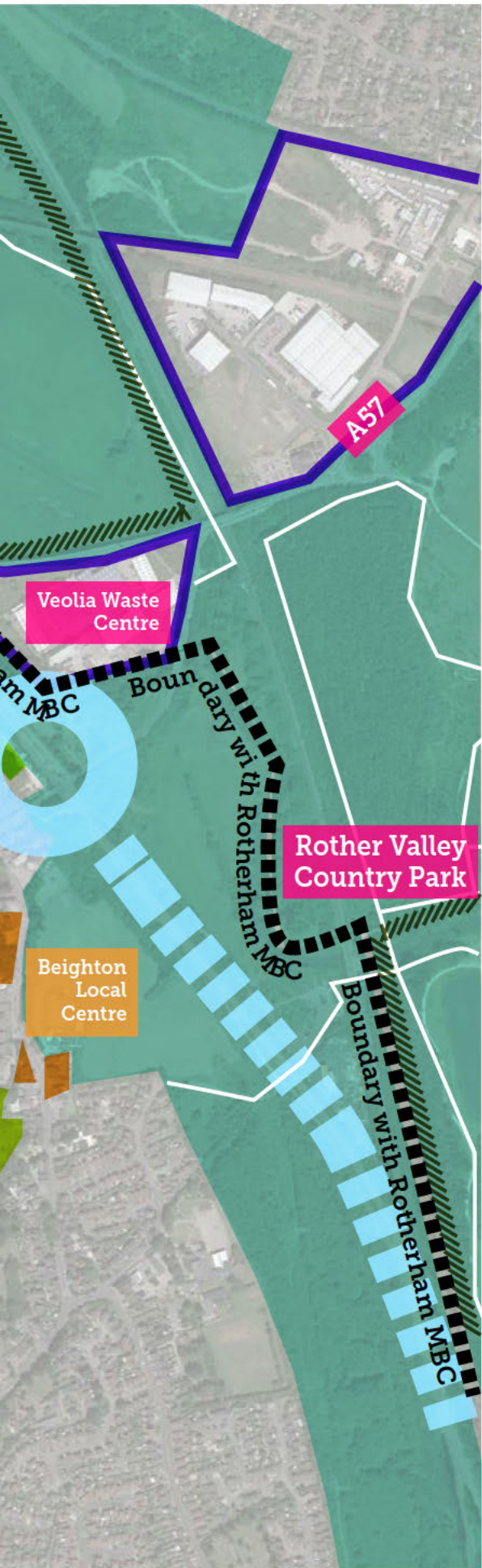
When looking at the development of the The Physical Plan it is clear that the Valley's Edge site for growth will complete the urban edge to Beighton. This will allow the A57 to become the northern edge of the settlement throughout the area and will also support and emphasise the importance of the valleys and green spaces throughout the area.



# Beighton: Existing Facilities and Services (Spawforth)







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## Vision

# Enriching Beighton

The Sheffield City Region “Restoring your Railway Fund” and SCR Integrated Rail Plan proposes the reinstatement of Beighton Station. The mass transit proposal will support the growth of Beighton improving connections with the wider city region.

Beighton is already well served by facilities and services with local facilities within the town centre (to the west) as well as at Beighton Top. These are supported by the facilities at Crystal Peaks which is a district centre.

Beighton is well connected with the wider region with the A57 providing links between Sheffield and the M1 motorway as well as the Supertram line providing an existing and attractive public transport link to Sheffield city centre.

The location of Valley's Edge is ideal to support the delivery of the reinstated station at Beighton. The majority of the site is within easy walking distance of this new facility which could support the delivery of new homes.

The proximity to the highway network as well as proposed and existing public transport routes will support the delivery of high quality homes on the site.

The delivery of high quality homes will enhance the offer in Beighton. It will build on the strengths of the place, such as proximity of green space and access to services by diversifying the housing mix to make the place an attractive and sustainable suburb of Sheffield.



Ellesmere Road, Pitsmoor, Sheffield (Sheffield Council Housing)



Cutlers View, Norfolk Park, Sheffield (Sheffield Housing Company)



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## Why Beighton?

# Housing Need

**There is a significant and recognised housing crisis within the UK. The country needs to provide around 300,000 homes per year to keep up with population growth and to start to tackle years of undersupply. Housing provision within Sheffield over the Local Plan period should be approximately 2,400-3,000 dwellings per annum to support planned future economic growth.**

The Framework states that local authorities should meet their objectively assessed housing needs in full and to boost significantly the supply of housing. The emerging Local Plan recognises the need to deliver a sufficient supply of housing to support economic development and growth to create sustainable communities.

The wider economic context in the country is also relevant. The recent covid-19 pandemic and the previous 2007/08 global financial crisis and associated recovery has impacted on the housing market meaning schemes that assist economic and housing growth are high on the Government's list of priorities. The Government's policy agenda through the Framework, ministerial statements, budgets and the planning white paper recognise the importance of housing and the significant economic imperative of encouraging new development proposals.

Sheffield forms an important part of the Northern Powerhouse and is the driving force in the Sheffield City Region. The South

Yorkshire authorities form a key economic area between the rest of Yorkshire and the North of England, and the Midlands and the South.

The Government's current standard methodology for the assessment of housing need indicates that Sheffield should provide 2,131 homes per annum. However, this does not allow for economic growth and the Strategic Economic Plan or affordability issues. The SEP vision aims by 2040 to create 33,000 extra people in higher level jobs and an extra £7.6bn growth in Gross Value Added in the economy. The vision also sets out to grow wages and for people to live longer with healthier lifestyles and for a net zero carbon city region.

Given that Sheffield is the largest conurbation, and fourth largest city in England it is reasonable that the city allow for significant economic growth to raise the aspirations for the region, reflecting the SEPs target and to deliver circa 2,400 to 3,000 new homes in Sheffield during the Local Plan period.

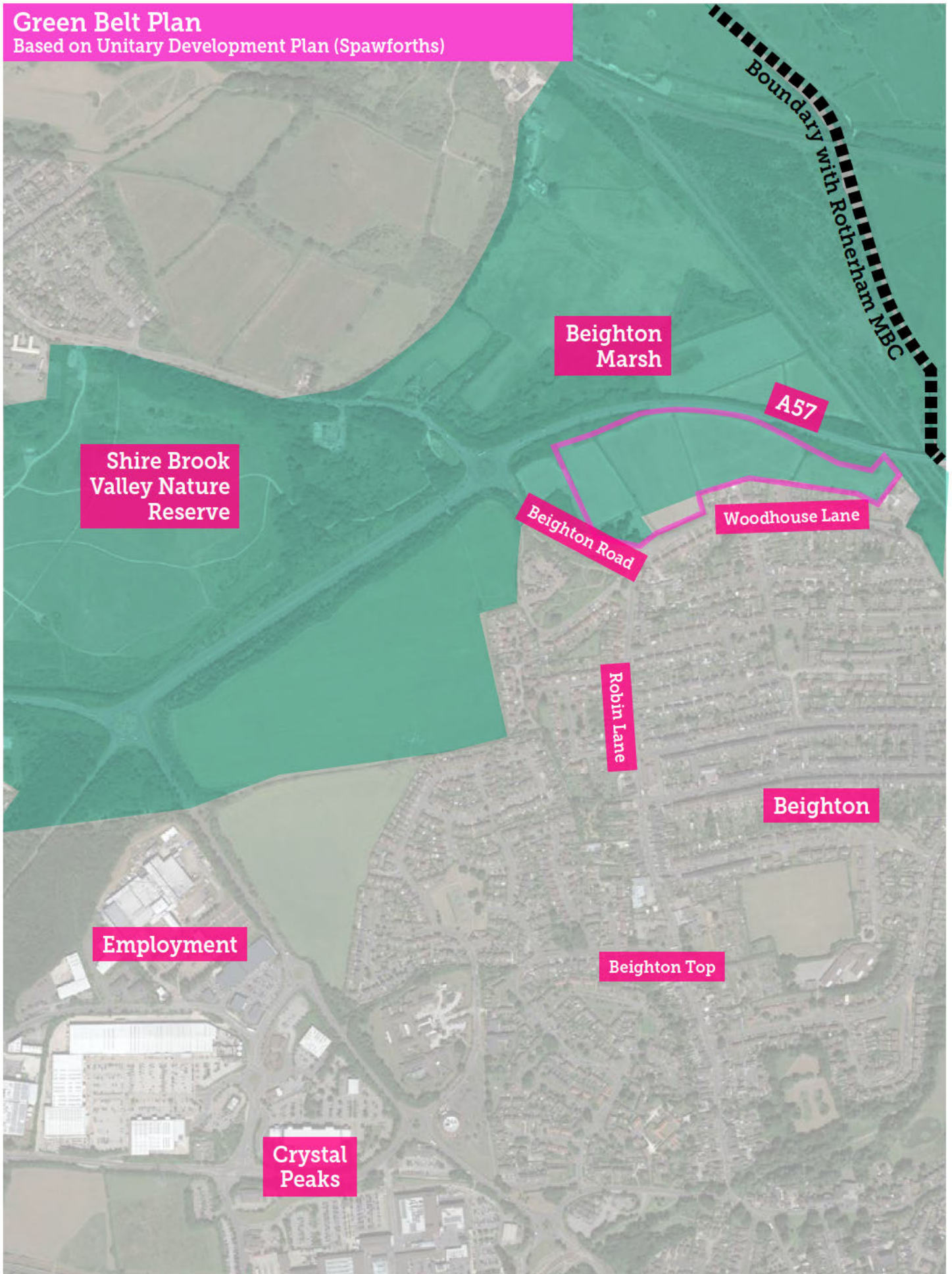
The development of new housing will bring forward additional economic benefits to Sheffield. The relationship between economic performance in an area and housing is complex, but having the right quantity, quality and balance of housing in an area is necessary for economic growth. The development of new housing can therefore support local economic growth, both through direct job creation through the construction phase of the scheme, but also through the increased population which will create sustainable local jobs from the increased demand for goods and services. This provides an important development opportunity for Sheffield.

Valley's Edge is located in a sustainable location and will provide new housing in close proximity to new and existing employment opportunities and sustainable transport connections. The site therefore represents an opportunity to provide quality housing in a sustainable location to help to meet the housing needs of Sheffield.



# Green Belt Plan

Based on Unitary Development Plan (Spawforths)



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## Why Beighton?

# Green Belt

**The housing and employment needs of Sheffield and the Sheffield City Region will require Sheffield City Council to review the Green Belt boundaries within the city. Valley's Edge is an opportunity to positively adjust the Green Belt boundary and form a new robust and long lasting boundary.**

Sheffield is enveloped by the South Yorkshire Green Belt which is placing a significant pressure and obstacle to housing delivery. Paragraph 83 of the Framework considers that Green Belt boundaries can change “in exceptional circumstances”. Such a circumstance exists through the significant need to provide housing in Sheffield. To meet the housing need and economic growth aspirations Sheffield City Council will need to revise the Green Belt boundaries for the emerging local plan and beyond to provide the new boundaries with some permanence.

The Sheffield Green Belt Review (Sept 2020) assesses the Valley's Edge site against the purposes of Green Belt and recognises it as performing a “weaker” Green Belt role. It is therefore a strong site for consideration for the removal from the Green Belt.

Spawforths agree with this assessment of the site and consider that it can be demonstrated that the allocation of the site for housing purposes will not undermine the integrity of the Green Belt:

### **1. To check unrestricted sprawl**

The allocation of the site will require some encroachment into the Green Belt. Part of the existing Green Belt boundary around Beighton is not considered to be robust as it is formed by the rear gardens of existing housing. Part of the site is currently in the urban area. A new robust Green Belt boundary will be formed using the A57 as a distinct feature.

### **2. To prevent neighbouring towns from merging**

The site is well contained by the A57 to the north, by houses to the south, Beighton Road to the west and the railway line to the east.

### **3. To assist in safeguarding the countryside from encroachment**

A strong green network, including Beighton Marsh and Shire Brook Valley Nature Reserve lie to the north of the A57. To the west of the railway line are further green areas, including the River Rother and Rother Valley Country Park. The site is therefore surrounded by a network of green spaces and is contained by the A57, which creates a robust defensible Green Belt boundary.

### **4. To preserve the setting of historic towns**

Beighton is not within a conservation area and the site is not adjacent to a designated conservation area. The allocation of the site will not affect the setting of a historic town.

### **5. To assist in urban regeneration**

The site is partly within the Green Belt and partly within the current urban area of Sheffield.

The impact on the openness of the Green Belt will be limited as the site is contained within its landscape, in an area which is influenced by existing residential and commercial development and the A57. It can therefore be demonstrated that the site has a limited role to play when considered against the five purposes of the Green Belt, and the development of the site will not undermine the integrity of the Green Belt around Beighton.





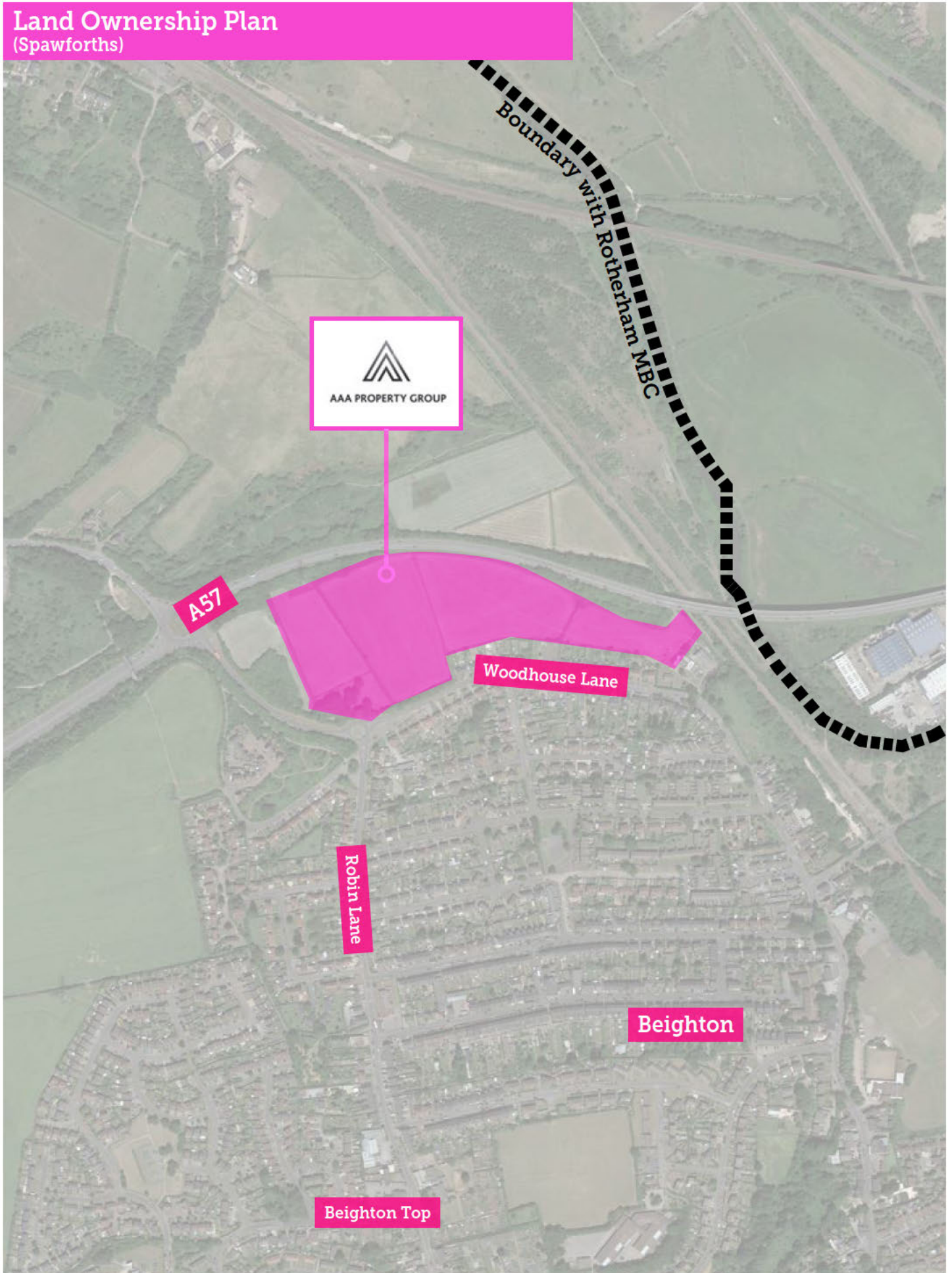
**be** beighton  
valley's edge



**Available / Suitable /  
Achievable**



# Land Ownership Plan (Spawforths)



# Available + Suitable

**The following sections of the advocacy report will show that the site at Beighton, known as Valley's Edge, is available, suitable and achievable. The site is controlled by AAA Property Group. The design has been determined by an expert technical team to support the delivery of the proposed scheme.**

## **Available**

The development proposals are being promoted by AAA Property Group, who have a legal agreement with the landowners of Starbuck Farm to allow the land to be brought forward for development.

AAA Property Group are a well-funded developer with a strong demonstrable track record of delivery of development and investment in the north of England. They are committed to develop the site and have appointed a technical team.

The land is therefore "available" in accordance with the Framework and the Planning Practice Guidance (PPG).

## **Suitable**

The Beighton site lies partly within and partly adjacent to the Sheffield Urban Area. The site is close to facilities and services in Beighton and at Crystal Peaks. The site is also accessible to employment opportunities in the area, including Holbrook Industrial Estate.

A number of bus services operate adjacent to the site. The Sheffield Supertram blue line has a stop at Crystal Peaks. The reopening of Beighton railway station would also make the site accessible to wider regional and national markets.

The M1 motorway is also close to the site and provides a positive link to the wider region for new residents, new staff, customers and there is a strong labour market catchment that the site will benefit from. The nearby businesses will also benefit from new homes locating here.

The development will also create opportunities for the improvement of green corridor routes and green spaces within the site and enhancing opportunities to access the green network nearby. This will provide opportunities for recreation for employees and local residents.

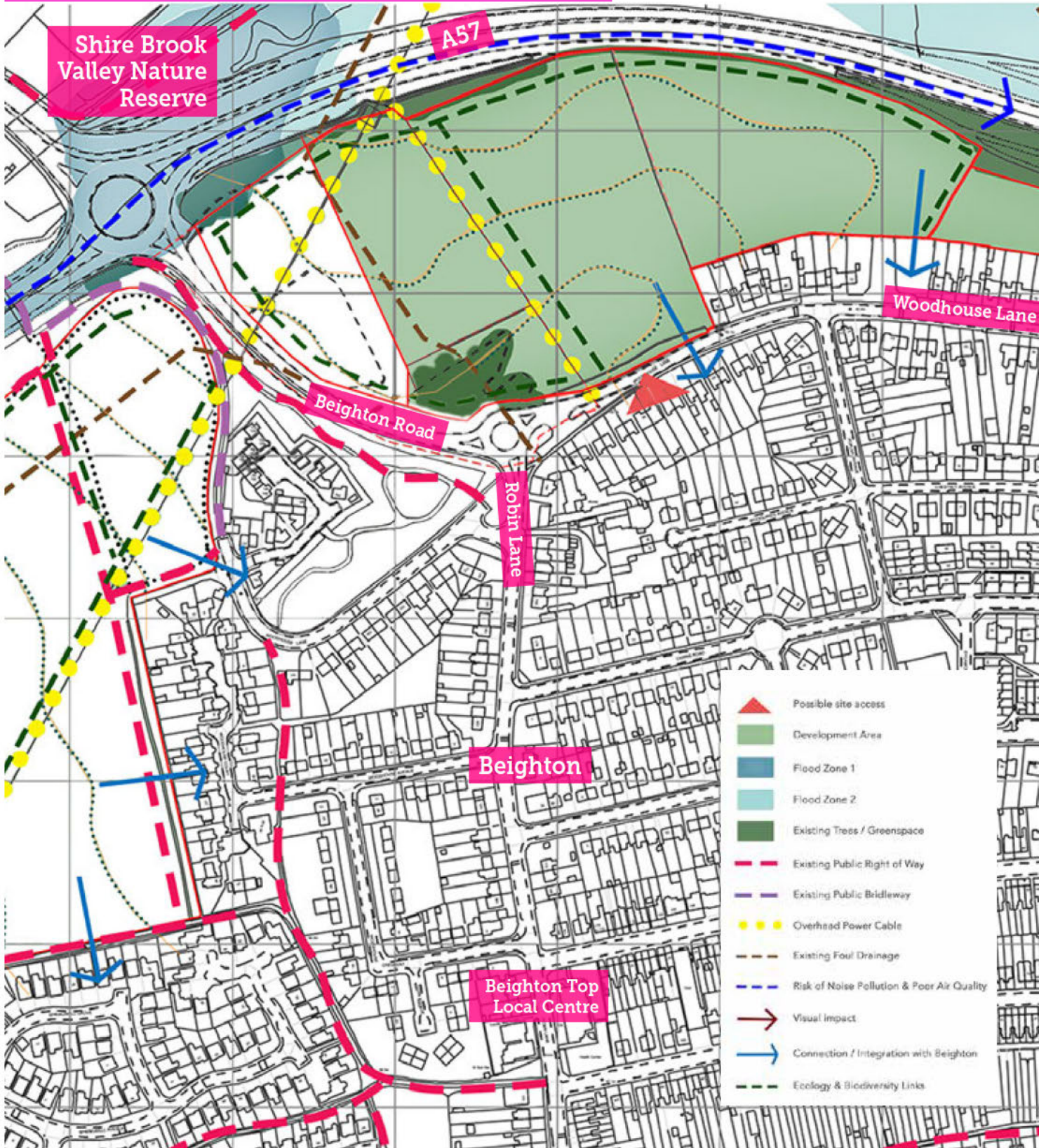
Although the land is partly within the Green Belt it provides a unique and well connected opportunity for development immediately adjacent to Crystal Peaks, services and facilities and accessible to the M1 Motorway. The Framework considers that Green Belt boundaries can change "in exceptional circumstances". Such a circumstance exists through the significant need to provide for housing in Sheffield.

The site and proposals are therefore "suitable" in accordance with the Framework and PPG.



# Opportunities + Constraints Plan

(KPP Architects)





## Achievable: Opportunities + Constraints

Technical assessments of the site have been undertaken to demonstrate that the entire site is deliverable and viable. Work is ongoing, however to date no significant constraints have been identified.



### Landscape

In the east of the site where the topography will allow development to sit low in the landscape and the A57 provides a clear boundary, residential development will read as part of the existing settlement from surrounding views and can be knitted in through a well considered landscape strategy.

### Flood

The area is predominately located within flood zone 1, however there is a small area which falls within flood zone 2 and 3. These areas will be utilised for open space and attenuation. There is an un-named watercourse along the eastern boundary which is anticipated to provide a surface water outfall, there will be an associated area of surface water attenuation on site. Foul water drainage will connect to the existing system.

### Ground

A desk top ground investigation has been undertaken for the entire site. This has not revealed any concerns regarding the deliverability of the scheme or any issues which may impact upon viability.

Further investigations will be carried out in due course but it appears that the site will have no significant issues related to ground conditions.

### Ecology

An initial review has shown the site is not of significant ecological importance. The proposed scheme will seek to enhance and improve the existing biodiversity on site and create linkages to nearby habitat areas.

There are no protected habitats or species on or in close proximity to the site which would be impacted by the proposals. Significant areas of woodland, hedgerows and boundary landscaping will be retained and enhanced where possible.

### Highways

The site is well placed to encourage modal shift towards sustainable transport rather than reliance upon private vehicles. A strategy will be developed to ensure that walking, cycling and public transport are feasible options for the sites inhabitants.

The review has not revealed any significant issues which would preclude development, or require costly mitigation to remedy.

### Utilities

The relevant utilities connections (water, gas, electricity and telecommunications) are all in close proximity to the site and there is sufficient capacity in the systems to cater for the development scheme. There are no significant diversions or upgrades required to serve the scheme.





**be** beighton  
valley's edge



# Masterplan Strategy



**Land Use Strategy Plan**  
(KPP Architects)

**Shire Brook  
Valley Nature  
Reserve**





# Land Use

Valley's Edge will allow the delivery of a housing-led scheme in Beighton. The delivery of new homes will support Sheffield and the city region to meet their growth aspirations. The site is controlled by AAA Property Group. It is proposed that this site is most suited to residential development.



The Site		
Use	Area (ha)	Capacity
Total Parcel	Total 5.8ha	
Residential	4.5ha	150 units
POS / Drainage	1.0ha	-



**Green + Blue Infrastructure Strategy Plan**  
(KPP Architects)



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be: beighton valley's edge

# Green + Blue Infrastructure

**The Beighton site will integrate the development with the surrounding blue and green infrastructure through the provision of new green connections through the site.**

The indicative masterplan for Valley's Edge has been designed to improve green connections through the site by creating green links between the Shire Brook valley and Rother valley to the woodland on the western side of the site.

The new routes through the site will be designed to support habitat and create ecology corridors through the site.

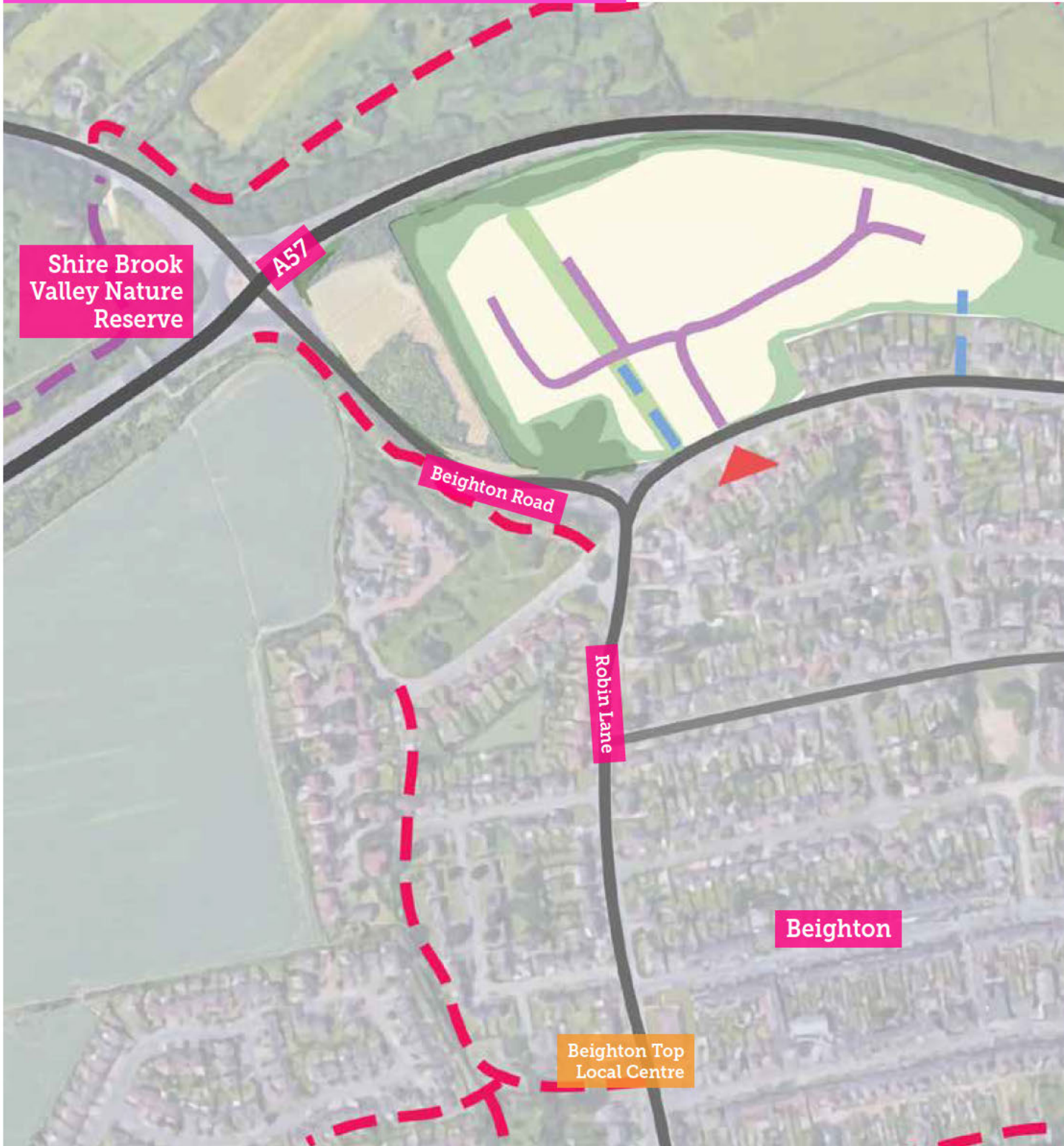
These green routes will also support and encourage active travel within the site and into the surrounding area. This will create attractive routes to encourage healthy behaviours and support the wellbeing of residents.





# Movement Strategy Plan

(KPP Architects)



# Movement

**The movement strategy for Valley's Edge will seek to create new active travel routes through the site linking the new homes to the surrounding green spaces and making connections into Beighton and Crystal Peaks.**

The focus on connectivity will be driven by the active travel routes. These will be safe and direct to seek to encourage new residents and employees to consider active travel methods.

Existing pedestrian and cycle routes within and surrounding the site will be incorporated into the scheme. New routes will also be provided connecting to these existing routes.

Further additional pedestrian and cycle connections will seek to create direct links to the Sheffield Supertram and proposed reopened Beighton Railway Station.

Vehicular routes into the site will be created in safe locations. The vehicular routes on the eastern part will form a cul-de-sac with an potential emergency access. The scheme will also seek to create a meandering route through the western part although with access to the proposed employment from the west and residential access from the east.





## Sustainability + Climate Change Strategy Plan (KPP Architects)



# Sustainability + Climate Change

**The Valley's Edge site is an opportunity to deliver new homes for Sheffield in a highly sustainable location. The proximity of the site to existing facilities and transport options will support the creation of a sustainable place.**

The open nature of the site will allow the development to maximise the opportunity to benefit from solar energy and the housing can be designed to minimise energy use.

The adjacent Shire Brook Valley provides a safe, off-road cycling route into the wider area. The development can create opportunities to link to this route and therefore encourage the new residents to cycle and walk into the wider area and into Crystal Peaks. This will encourage healthier lifestyles as well as supporting sustainable travel in the local area.

In addition Valley's Edge can be designed to minimise the impact of the development on the environment, supporting the creation of new habitats as well as reducing the carbon dioxide produced.

Valley's Edge will deliver a place which is connected to the existing community and which is focused on the well being of people and the environment.

Valley's Edge will be a development that gives residents a place where they can work and live safely and enjoy being a part of Beighton.





# Placemaking Strategy Plan

(KPP Architects)



# Placemaking

**Valley's Edge will seek to create a distinctive development which maximises the opportunities the site provides. The new development will integrate into the existing urban area and support wayfinding around Beighton.**

The Valley's Edge development will provide new housing which will create a gateway to Beighton from the A57 for vehicles entering from Beighton Road.

Within the development focal points will be created at key junctions using the landscape and buildings to create unique places to help visitors, residents and employees to orientate themselves.

The whole development will be designed to integrate with Beighton. Valley's Edge will feel like the natural extension to the existing place, supporting and enhancing the neighbourhood.





# Illustrative Masterplan (KPP Architects)

Shire Brook  
Valley Nature  
Reserve

A57

Beighton Road

Robin Lane

Beighton

# Phasing + Delivery



**AAA Property Group have commissioned and undertaken a range of technical assessments that show that the development of the site is “achievable”. Whilst further work is ongoing, the available technical information for the site demonstrates that the proposed scheme is achievable and viable, and therefore deliverable.**

Given the stage of the plan making process and proportionality of evidence at this stage standard industry assumptions have been utilised along with sensitivity testing around a number of varying scenarios. Nevertheless, this has demonstrated that the proposal will deliver a reasonable incentive for the landowners and a suitable return for the developers. The proposed scheme therefore fully accords with the Framework and can be considered deliverable.

The illustrative masterplan shows that the scheme can come forward in the short term and be delivered. The site is proposed to be accessed from Woodhouse Lane and deliver high quality new homes.

The scheme will deliver its own infrastructure needed. This will include drainage, utilities and green infrastructure and ensure the vision and objectives and high design quality is also achieved.

A high level delivery trajectory demonstrates that the proposed scheme can be fully delivered within the Local Plan period.



# Illustrative Masterplan (KPP Architects)



# Conclusion

**Valley's Edge presents a significant opportunity to deliver new homes and address the city's housing need. The site presents an opportunity to create a high quality living environment , whilst assisting in the regeneration of Sheffield city centre.**

This advocacy report shows that the Valley's Edge site at Beighton provides a unique opportunity to create a new housing scheme. The proposed scheme creates new homes in a sustainable location close to existing services and facilities, accessible to a range of public transport modes and the M1 motorway.

The adjacent Beighton Marsh, Shire Brook Valley Nature Reserve and Rother Valley Country Park create opportunity for leisure which sets the site apart and provides future residents and employees with recreational opportunities. The site is within close proximity to Crystal Peaks and is on the tram route into Sheffield City Centre. The proposed Beighton Railway Station will also provide both regional and national access.

The delivery of the Beighton scheme will therefore generate significant benefits for Sheffield and the wider region through the creation of direct and indirect job opportunities, alongside environmental and community benefits, stimulating the local economy, adding value and changing perceptions of the area.

AAA Property Group control the site, which is therefore "available" and can be delivered in the short term in accordance with the Framework.

It has been shown that the site is suitable for development. The site is in a sustainable area close to a range of services and facilities and public transport routes. The site lies partly in the Green Belt and this advocacy report confirms there are exceptional circumstances supporting the release of the site from the Green Belt due to the urgent need to meet Sheffield's housing need and ambitions for growth. The site is therefore "suitable" for a housing development in accordance with the Framework.

The site has been reviewed against the Framework and criteria for allocating sites. It has been shown that there are no major constraints to the development of the site and that the site can be delivered in the local plan period. The site is therefore "achievable" in accordance with the Framework.

The technical reports undertaken have informed the masterplan strategy. The strategy shows how housing can be accommodated within the site, alongside connectivity, landscaping and drainage features. The development of the site is considered to be achievable.

It has therefore been shown that the site is available, suitable and achievable. It is considered that the site is deliverable and is also attractive to the market, viable and is deliverable within the plan period.

