

Representation on the Sheffield Plan Publication (Pre-Submission) Draft

Respondent details

Comment ID number: PDSP.019.001

What is your Name: Pegasus Group

If you are making this representation as a member of an organisation, what is the name of your organisation:

Pegasus Group

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

Avant Homes Yorkshire

Document

Which document to you wish to make a representation on:

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

Which section of the document is your representation on:

Chapter 2: Vision, Aims, and Objectives

Which paragraph/site/map layer of the document is representation on:

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

Whilst our client generally supports the vision we do not consider that the plan overall will be effective in ensuring that the vision is realised. Our client has particular concern in relation to paragraph 2.9. This element of the vision identified that: "The city will provide a good quality housing offer meeting the needs of different household types and sizes".

Within our comments upon policies SP1, SP2, SA9 and H1 we provide greater detail upon this issue. It is, however, considered that the plan is too heavily weighted towards city / edge of city urban regeneration sites. Whilst we do not dispute the need for such allocations we consider that the plan fails to meet the needs of families

who wish to live outside of the city in settlements such as High Green and Chapeltown. It also fails to take account of its own economic viability evidence.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

In order to overcome this issue it is recommended that additional allocations are identified within the High Green / Chapeltown area.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s):

Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To ensure that the Inspector fully understands our clients position and to respond to further issues raised by the Council or third parties.

Representation on the Sheffield Plan Publication (Pre-Submission) Draft

Respondent details

Comment ID number: PDSP.019.002

What is your Name: Pegasus Group

If you are making this representation as a member of an organisation, what is the name of your organisation:

Pegasus Group

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

Avant Homes Yorkshire

Document

Which document to you wish to make a representation on:

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

Which section of the document is your representation on:

Chapter 2: Vision, Aims, and Objectives

Which paragraph/site/map layer of the document is representation on:

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

Our client is generally supportive of most of the objectives. The key concern relates to the objectives concerning thriving neighbourhoods and communities. These objectives include:

- 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.
- To significantly increase the supply of affordable housing, accessible market housing and specialist housing for older people, disabled people and other vulnerable groups, particularly in places of greatest need.

- To create neighbourhoods that work for everyone, with a mix of housing and access to a range of local facilities, services and open space, offering all residents the best life chances.

Whilst in themselves the objectives are considered laudable the plan will not deliver them. All these issues are discussed in greater detail within our comments upon specific policies. However, in summary, we consider that the:

- Housing requirement is inadequate to meet the needs of the area, including affordable homes,
- Housing supply will not deliver the identified housing requirement due to a lack of deliverable sites, and
- Mix of identified sites will not meet the needs of the whole community.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

The required amendments to the plan are set out within our comments upon the relevant policies but include a higher housing requirement and greater mix of sites, including with the High Green / Chapeltown area.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s):

Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To ensure that the Inspector is fully aware of our clients concerns and to respond to issues raised by the Council or third parties.

Representation on the Sheffield Plan Publication (Pre-Submission) Draft

Respondent details

Comment ID number: PDSP.019.003

What is your Name: Pegasus Group

If you are making this representation as a member of an organisation, what is the name of your organisation:

Pegasus Group

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

Avant Homes Yorkshire

Document

Which document to you wish to make a representation on:

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

Which section of the document is your representation on:

Chapter 3: Growth Plan and Spatial Strategy

Which paragraph/site/map layer of the document is representation on:

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: No

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Part 'a' of the policy identifies that the Sheffield Plan will deliver 35,530 new homes by 2039. This equates to an annual average delivery rate of 2,090 homes from 2022 to 2039. This is significantly below the figure identified by the standard method as set out within the Planning Practice Guidance (PPG). The following discussion considers the issues of housing need, the housing requirement and the Council's responsibilities under the duty to cooperate. Each is discussed in turn below.

Housing Need

In accordance with paragraph 61 of the NPPF the minimum number of homes required within a local authority area is determined via the standard method outlined

in the PPG. The current standard method identifies a four-step approach to determining local housing need. These steps are:

- Step 1: Setting the baseline – this takes the average rate of growth over 10-year period from the 2014-based household projections in England
- Step 2: Affordability adjustment – this adjusts the household projections by applying an adjustment based upon the most recent median workplace-based affordability ratio.
- Step 3: Capping the level of increase – this caps the level of increase in step 2 at 40% based upon the higher of the household projections or local plan target
- Step 4: Cities and urban centres uplift – this applies a further 35% uplift to the urban local authorities in the top 20 cities and urban centres list.

All four steps are relevant to Sheffield as this is one of the top 20 cities and urban centres. The following table identifies the current minimum LHN figure, using a 2022 base date.

Figure 1: Sheffield Local Housing Need (per annum)

Step	Dwellings
1.	Setting the baseline 1,972
2.	Affordability adjustment 2,236
3.	Capping the level of increase 2,236
4.	Cities and urban centres uplift 3,018
Sheffield LHN	3,018

The minimum LHN requirement is 928dpa greater than the housing requirement proposed within the Sheffield Plan. This is 15,776 dwellings over the plan period. This is a significant and unjustified shortfall.

Both the NPPF and Planning Practice Guidance (PPG) identify that the LHN calculated via the standard method is a minimum requirement. Housing requirements set below the minimum requirement will require exceptional circumstances to be demonstrated. Neither the Sheffield Plan nor its evidence base clearly identify these exceptional circumstances. The requirement is, therefore, unjustified.

The Council's only evidence in relation to housing need is the 2021 Icen Projects paper 'Housing, Economic Growth and Demographic Modelling'. This paper whilst considering the 2018-based subnational population projections does not consider whether an uplift is required to assist with issues such as affordability, affordable housing delivery or concealed households.

2018-based subnational population projections

These projections are used throughout the Icen Projects paper without justification or the demonstration of exceptional circumstances. The PPG (ID 2a-005-20190220) is clear that the 2014-based household projections are used in the standard method to provide stability and ensure that 'historic under-delivery and declining affordability are reflected' as well as being consistent with the 'Government's objective of significantly boosting the supply of homes'.

The PPG further notes that any:

"...method which relies on using household projections more recently published than the 2014-based household projections will not be considered to be following the standard method". (PPG ID 2a-015-20190220)

In such cases and in particular, where a lower requirement is identified, the Council will be required to demonstrate exceptional circumstances. No such evidence is provided within the Icen Projects paper.

Uplifts to the Household Projections

The key focus of the 'Housing, Economic Growth and Demographic Modelling' paper is an attempt to link projected jobs growth and housing growth. This is an imprecise science based upon several changeable assumptions in relation to issues such as projected jobs growth, economic participation rates, double-jobbing and commuting patterns. Table 7.5 of the paper identifies a range of 1,556dpa to 2,323dpa, indicating how amendments to these assumptions can have a profound effect upon the housing need identified.

Paragraph 9.13 to 9.15 of the report concludes that:

“Modelling the required labour supply increase linked to these forecasts suggests a need for up to 2,323 dwellings per annum although this could be reduced by around 300 dpa to 1,994 dpa, if further improvement to economic activity rates could be achieved.”

As all these figures are lower than the Standard Method (2,923 dwellings per annum) there is no reason to exceed this level of housing growth to meet the economic needs of the city. Furthermore the standard method also generates an excess level of economically active population in comparison to economic forecasts.

Notably, there is a better balance between housing growth using the older version of the standard method i.e. without the urban centres uplift (Step 3 - 2,165 dpa) and the ranges suggested to meet the highest of the economic growth herein (1,794 to 2,323 dpa).”

These paragraphs appear to presume that the economic forecasts are set and the only variable which should be considered in relation to housing need. The paper also fundamentally misunderstands the reasoning behind step 2 'affordability adjustment' and step 4 'cities and urban centres uplift' of the LHN calculation.

Step 2 is provided as the Government recognises that household growth projections on their own are an insufficient indicator of future housing need. In response to this the median workplace-based affordability ratio are utilised to provide an appropriate uplift. The PPG identifies that this is required because:

“household formation is constrained to the supply of available properties – new households cannot form if there is nowhere for them to live; and people may want to live in an area in which they do not reside currently, for example to be near to work, but be unable to find appropriate accommodation that they can afford.” (PPG ID 2a-006-20190220).

The Government's uplift, therefore, seeks to take account of past constraints on household formation rates and the need and demand for homes within an area to enable people to live near to where they work. The Iceni Projects paper completely fails to take these elements into account.

In terms of step 4 the Iceni Projects paper fails to deal with the Government's rationale and reasoning for step 4 of the LHN calculation, the 'cities and urban centres uplift'. The cities and urban centres uplift was first introduced in 2020 through amendments to the PPG following the Government's consultation upon 'Changes to the current planning system'. The rationale for this its introduction is set out within the Government's response to this consultation and was threefold, this being:

- building in existing cities and urban centres ensures that new homes can maximise existing infrastructure such as public transport, schools, medical facilities and shops,
- there is potentially a profound structural change working through the retail and commercial sector, and we should expect more opportunities for creative use of land in urban areas to emerge, and

- climate aspirations demand that we aim for a spatial pattern of development that reduces the need for unnecessary high-carbon travel.

A figure of 35% was chosen to ensure:

“...consistency with the government’s Manifesto commitment to see 300,000 homes per year delivered by the mid 2020s...”

The Government’s rationale was also clear that the increase in the number of homes to be delivered is expected to be met by the cities and urban centres themselves (i.e. Sheffield) rather than the surrounding areas.

Whilst not explicit it is clear through a reasonable interpretation of the Government’s rationale for the introduction of the uplift that this was required to meet the wider needs of the country and meet the target of delivering 300,000 homes per year by the mid 2020s.

The PPG largely re-iterates many of the above points.

It is noted that the Government recently commenced a consultation upon potential changes to the NPPF. This consultation ‘Levelling-up and Regeneration Bill: Reforms to national planning policy’ does not suggest amendments to the NPPF but does seek to elevate the cities and urban centres uplift into policy. This change would effectively strengthen the Government’s commitment to these settlements delivering additional housing growth.

Paragraph 14 identifies that the cities and urban centres uplift:

“...supports our approach to making the best use of brownfield land. The method for calculating local housing need was amended in 2020 to apply an uplift of 35% for the 20 largest towns and cities, in recognition of this potential. The government intends to maintain this uplift and to require that this is, so far as possible, met by the towns and cities concerned rather than exported to surrounding areas, except where there is voluntary cross-boundary agreement to do so (for example through a joint local plan or spatial development strategy). It will be important to capitalise on opportunities to further densify in these already-developed urban areas, using local design codes to do so in ways that take account of the existing environment.”

Both the response to the previous consultation and the current consultation clearly demonstrates the Government’s desire for the countries largest cities and urban centres to play their part in meeting the housing needs of the country. This uplift first introduced in 2020 was a clear diversion from previous policy and sought a step-change in delivery within our main cities and urban areas.

In stating that:

“...the standard method also generates an excess level of economically active population in comparison to economic forecasts.”

The Icen Projects paper completely fails to grapple or understand this issue.

Once again the Icen Projects paper fails to identify exceptional circumstances to not consider the uplifts identified in the LHN standard method, this is unsound.

Other Factors

The PPG (ID: 2a-010-20201216 and 67-008-20190722) also identifies a non-exhaustive list of instances where the minimum requirement should be exceeded.

These include:

- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g., Housing Deals);
- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally;

- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;
- Past levels of delivery or previous assessments of need; or
- To assist in meeting the need for affordable housing.

Most of these issues are simply ignored. Arguably the only elements which are considered are growth strategies, by taking account of economic projections and agreeing to take unmet need from a neighbouring authority. In terms of the latter point it is noted that paragraph 3.7 of the Sheffield Plan is clear that it is not relying on other local authorities in the city region to meet any of its housing needs and Sheffield does not intend to meet any housing needs arising elsewhere in the city region. This issue is discussed further below.

In terms of affordable housing the Council's 2019 Sheffield Strategic Housing Market Assessment (2019 SHMA) identifies a need for 902 additional affordable homes per year. The delivery of affordable housing is not considered within the Icen Projects paper, or indeed elsewhere within the evidence supporting the current consultation on the plan. The NPPF identifies that the needs of groups with specific housing requirements are addressed (paragraph 60).

The identified 2019 SHMA requirement represents more than 43% of the proposed housing requirement, nearly 39% of the upper end of the identified Icen Projects need and almost 30% of the LHN. Whilst it is recognised that the provision of affordable housing via market schemes is not the only method of delivery, greater levels of market provision would assist in meeting more of this need.

Figure 1 below identifies affordable housing delivery within Sheffield between 2015/16 and 2021/22. This is compared against overall net housing delivery. The Council has performed abysmally in meeting the affordable housing need identified in the SHMA. Indeed, it has only delivered 1,363 affordable dwellings, since 2015/16. This represents less than 10% of the overall housing delivery over the period and is significantly less than the 902 affordable dwellings per year identified in the 2019 SHMA.

In addition, as discussed within our comments against Policy H1 it is notable that the Council's 'Whole Plan Viability Assessment' suggests that large areas of the Sheffield Plan area are unviable even with a 0% contribution to affordable housing. This makes the delivery of 902 affordable homes per year highly unlikely.

Figure 1: Housing Delivery

Year	15/16	16/17	17/18	18/19	19/20	20/21	21/22
Affordable	305	327	99	165	129	207	131
Total	1,589	2,248	2,304	1,976	3,083	1,850	1,774
% Aff'ble	19	15	4	8	4	11	7

Based upon the above discussion the Council has failed to identify the required exceptional circumstances to deviate from the standard method for determining its LHN. The plan and its evidence is, therefore, considered unsound as it is not positively prepared, justified, consistent with national policy or effective.

Housing Requirement

The proposed housing requirement of 2,090dpa is not justified by any of the evidence supporting the Sheffield Plan. As already discussed, the LHN standard method produces a figure of 3,018dpa and the disputed Icen Projects report figures of 1,794 to 2,323dpa. None of these figures represent the proposed housing requirement of 2,090dpa.

The justification for this figure is unclear, other than a brief reference to being set to reflect the capacity of the existing urban areas and the restrictions imposed by the

Green Belt (Sheffield Plan, paragraph 3.8). However, this is not justified in the evidence. The lack of justification makes the housing requirement unsound.

Duty to Cooperate

The NPPF, paragraph 24, is clear that:

“Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.”

Furthermore, it goes on to note (paragraphs 26 and 27) that this cooperation should be effective. Given that housing need is an issue which transcends boundaries consideration must be given to assisting neighbouring authorities meet any unmet needs. The scale of the assistance should be proportionate and based upon evidence not only of the scale of the need but also the capacity to accommodate such need.

The Sheffield Plan (paragraph 3.7) identifies that:

“Sheffield is not relying on other local authorities in the city region to meet any of its housing needs and Sheffield does not intend to meet any housing needs arising elsewhere in the city region.”

The Council’s December 2022 ‘Duty to Cooperate Position Statement’ identifies that:

“The sub-regional SoCG will provide context around the number of homes currently being planned for across the area in comparison to the Government’s targets, and how many homes are being delivered...” (paragraph 2.6) and “This evidence and sub-regional context will form the basis for Sheffield’s SoCG, in which authorities will be asked to confirm that housing delivery will continue to contribute to overall housing needs across the wider area...” (paragraph 2.7).

The above text from ‘Duty to Cooperate Position Statement’ appears contrary to the position stated in the Sheffield Plan. Furthermore, the 35% cities and urban centres uplift is intended to be delivered within the cities and urban areas themselves.

The current SoCG was published in 2019 and fails to address the current LHN calculation for Sheffield. It is, therefore, unclear who or how any unmet housing need from Sheffield would be addressed or even if it has been adequately considered.

This is considered a failing under the duty to cooperate.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

The housing requirement be increased to meet the minimum requirement identified by the LHN standard method.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s):

Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To ensure that the Inspector fully understands our clients position and to address any further issues raised by the Council or third parties

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Respondent details

Comment ID number: PDSP.019.005

What is your Name: Pegasus Group

If you are making this representation as a member of an organisation, what is the name of your organisation:

Pegasus Group

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

Avant Homes Yorkshire

Document

Which document to you wish to make a representation on:

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

Which section of the document is your representation on:

Policy SP2: Spatial Strategy

Which paragraph/site/map layer of the document is representation on:

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

The policy identifies that the majority of future growth will be on previously developed sites within existing urban areas. These are the Main Urban Area of Sheffield, and the two Principal Towns of Stocksbridge/Deepcar, and Chapeltown/High Green. The identification of these areas as the main focii of growth is supported and considered appropriate, given the clear sustainability credentials of these settlements / areas. However, as discussed in relation to Policy H1 the very limited number of residential allocations (25 dwellings) within Chapeltown/High Green effectively restricts development within this Principal Town. This will mean that localised needs emerging from within the settlement are not met and will need to be

met elsewhere and that the settlement fails to fulfil its role within the settlement hierarchy.

The lack of allocations within Chapeltown/High Green is largely due to the Council's Cooperative Executive decision on 16th February 2022 to restrict development to suitable brownfield and previously undeveloped (greenfield) sites in the existing urban areas and limit Green Belt releases to sustainably located brownfield sites. Whilst the focus upon previously developed sites within existing urban areas is not disputed, this should not be at the expense of meeting the wider needs of the city and individual settlements. This is a particular issue in the case of Chapeltown/High Green which is tightly constrained by its existing Green Belt boundary and has few brownfield opportunities.

Given the clear constraints and lack of opportunities within Chapeltown/High Green it is considered that the release of limited greenfield Green Belt sites is justified and provides the exceptional circumstances required. The failure to provide such alternatives will limit the opportunities for existing and future residents of Chapeltown/High Green to access appropriate accommodation, including affordable housing.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

Additional Green Belt allocations are provided within Chapeltown/High Green.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s):

Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To ensure that the Inspector fully understands our clients position and to respond to any further issues raised by the Council or third parties.

Representation on the Sheffield Plan Publication (Pre-Submission) Draft

Respondent details

Comment ID number: PDSP.019.007

What is your Name: Pegasus Group

If you are making this representation as a member of an organisation, what is the name of your organisation:

Pegasus Group

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

Avant Homes Yorkshire

Document

Which document to you wish to make a representation on:

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

Which section of the document is your representation on:

Policy SA9: Chapeltown/High Green

Which paragraph/site/map layer of the document is representation on:

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

The identification of Chapeltown/High Green as a Principal Town is supported and considered appropriate given the sustainability of the settlement and the facilities and services provided. However, as discussed against other policies the lack of allocations (25 dwellings) within the plan mean that localised needs emerging from within the settlement are not met and will need to be met elsewhere and that the settlement fails to fulfil its role within the settlement hierarchy.

The policy also identifies that 101 dwellings will be delivered through small sites and a further 20 dwellings through a large site with permission in the north east. This equates to just 145 dwellings in the Ecclesfield Neighbourhood Plan Area. There is no discussion or consideration of whether the small sites identified are likely to

deliver or whether this is sufficient to meet the needs of the area. Furthermore, no clarity is provided as to whether the Neighbourhood Plan, if progressed, should seek to deliver this or a greater quantum of housing. It is our clear view that further allocations should be made within the sub-area through the Sheffield Plan.

The lack of housing delivery within Chapeltown/High Green will have serious implications for affordable housing delivery within the area. Draft Policy NC3 of the Sheffield Local Plan identifies that 10% of all homes on qualifying new sites will be affordable. The site size threshold for affordable housing provision is identified as 10 or more dwellings. Given that 101 of the 145 dwellings identified will be small sites, these are unlikely to provide any affordable housing. The two proposed allocations in Chapeltown/High Green, site references CH01 and CH02, will deliver 10 and 14 homes respectively. If these sites are policy compliant this a maximum of 3 affordable dwellings will be delivered in the Chapeltown/High Green area over the plan period.

Within our response to Policy SP1 and demonstrate in figure 1 there is a significant need for affordable housing across Sheffield and the Council's track record of delivery has been poor. The lack of potential to address affordable housing needs within areas such as Chapeltown/High Green will only exacerbate this already dire situation.

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This could be easily rectified by taking a more balanced approach to the Green Belt in the sub-area. As discussed within our comments upon Policy SP2

Chapeltown/High Green is tightly constrained by its existing Green Belt boundary and has few brownfield opportunities. This lack of opportunities on non-Green Belt sites means that existing and future residents of Chapeltown/High Green will be unable to access appropriate accommodation, including affordable housing provides. It is considered that this, and the identification of Chapeltown/High Green as a Principal Town provides the exceptional circumstances required to release further Green Belt sites in this location.

Our client's site Land at Springwood Lane, High Green (see accompanying promotional document) sits within parcel CN-2 of the Council's 'Green Belt Review'. This is a large parcel of land which extends from the edge of High Green to the A61. The Green Belt Review identifies that this parcel scores poorly (2 out of 5) in relation 'to check the unrestricted sprawl of large built-up areas' (purpose 1) and 'to prevent neighbouring towns from merging' (purpose 2). Indeed, this parcel is the lowest scoring of all Green Belt parcels in Chapeltown North.

Whilst the parcel scores higher with regards the other purposes of 'to assist in safeguarding the countryside from encroachment' (purpose 3) and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land' (purpose 5) this is common of all other parcels in the study. This is recognised within the Green Belt Review at paragraph 6.20 and as such purposes 1 and 2 are considered critical.

Stage 2 of the Green Belt Review undertakes a more fine-grained approach and our client's site falls within parcel CN-2-c. Once again, whilst still a large parcel, this is one of the lowest scoring of the Green Belt assessment parcels. Scoring moderately against 'to check the unrestricted sprawl of large built-up areas' (purpose 1) and low against 'to prevent neighbouring towns merging into one another' (purpose 2).

Against these 'critical purposes' the parcel scores just 4 out of 10. Our evidence (see accompanying promotional document) suggests that our client's site would have

limited impact upon either of these issues and indeed would provide a clear defensible boundary to stop any encroachment into the countryside. Our client's site is, therefore, the most credible option for a new site within the Chapeltown/High Green area. Delivery of our client's site would enable the provision of a mix of housetypes and tenures and would go some way to meeting the needs within the area.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

It is recommended that additional Green Belt allocations are provided within Chapeltown/High Green. As demonstrated by our supporting evidence our clients site is in a sustainable location and fulfils very few Green Belt purposes and therefore could be released without significantly impacting upon the Green Belt.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s):

Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To ensure that the Inspector is fully aware of our clients concerns and to address any further issues raised by the Council or third parties.

Representation on the Sheffield Plan Publication (Pre-Submission) Draft

Respondent details

Comment ID number: PDSP.019.008

What is your Name: Pegasus Group

If you are making this representation as a member of an organisation, what is the name of your organisation:

Pegasus Group

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

Avant Homes Yorkshire

Document

Which document to you wish to make a representation on:

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

Which section of the document is your representation on:

Policy SA9: Chapeltown/High Green

Which paragraph/site/map layer of the document is representation on:

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

High Green is a major settlement and important town within the suburbs of north Sheffield. It is correctly identified as a Principal Town within the Sheffield Plan settlement hierarchy. It is important that developments within this locality are provided to meet the demands of the growing population. Whilst an emphasis upon urban and brownfield sites is considered acceptable the lack of alternative sites within High Green means that greenfield sites adjacent to the existing development boundary should also be considered.

Our clients proposed site at Springwood Lane provides logical development site which would assist in meeting the housing needs not only of High Green but also of the wider area, including much needed affordable housing. The parcel is self-

contained and would provide a strong new defensible edge to the Green Belt in this location.

The site is in a sustainable location close to services and facilities and within easy reach of public transport opportunities and will promote walking and cycling. The development would respect and complement both the landscape setting and the informal woodland setting of Spring Wood, whilst strengthening the physical connection and visual relationship between both.

The accompanying promotional document (sent via email) provides further details on the proposed scheme.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

Allocation of our clients site at Springwood Lane, High Green.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s):

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What is your Name: Pegasus Group

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Pegasus Group

If you or your organisation are making a representation on behalf of another person, organisation or group, please tell us who it is and its role:

Avant Homes Yorkshire

Document

Which document to you wish to make a representation on:

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

Which section of the document is your representation on:

Policy H1: Scale and Supply of New Housing

Which paragraph/site/map layer of the document is representation on:

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

Do you consider the Local Plan complies with the duty to co-operate: Yes

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate:

Emphasis on previously developed land

The Sheffield Plan and the policy has a strong emphasis on the delivery of housing on previously developed land. Identifying a target of 85% on previously developed land over the plan period (2022 to 2039). Whilst a laudable aim this must be balanced against the prospect of delivery.

In this regard the Council has undertaken a 'Whole Plan Viability Assessment', published in September 2022. This assessment is necessarily 'broad brush' and is reliant upon several assumptions. Whilst our client does not seek to dispute these assumptions at this stage it should be recognized that changes to the assumptions can have a significant impact upon the outputs from the assessment. This could

occur for a variety of reasons including continued increases to build costs. Paragraph 10.68 of the assessment recognizes that an above 5% increase in build costs is likely to render most of the sites identified within the plan unviable. This is a significant concern and threatens the deliverability of the Sheffield Plan. The assessment, table 12.8, identifies large swathes of brownfield land across the plan area is unviable even at current build costs and with a 0% affordable housing contribution. Given that the Council is reliant upon these areas to deliver a significant quantum of the housing growth this places the delivery of the whole plan in jeopardy. Furthermore, placing a significant amount of housing growth in areas of the city which, based upon the Council's own evidence, cannot sustain affordable housing delivery would be contrary to the plan vision and objectives which seek to 'significantly increase the supply of affordable housing'.

Sources of Supply

Table 1 of the Sheffield Plan identifies the sources of housing land supply over the plan period. This identifies that up to 35,558 dwellings could be delivered. This is a buffer of just 28 dwellings, or less than 0.1%, over the housing requirement. This requires almost all the identified sources of supply to deliver in full over the plan period, allowing very little room for slippage or non-delivery.

The viability issues discussed above already cast doubt upon whether the proposed allocations will deliver in full. However, this is exacerbated by the fact that 8,075 dwellings of the supply are made up from a small windfall allowance of 200 dwellings per annum (3,400 dwellings) and an 'estimated supply' of 4,675 dwellings from 'Broad Locations for Growth'.

Whilst, at this stage, we do not wish to dispute the windfall allowance the NPPF (paragraph 71) is clear that this must be based upon:

"...compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends."

The relevant evidence of both past rates and future supply should be provided prior to examination of the plan. This is imperative given that the plan is reliant upon this source to meet its identified minimum requirement.

In terms of 'Broad Locations for Growth' there is currently little to no evidence that these areas will deliver the quantum of development identified within table 1 of the Sheffield Plan. Indeed, the plan itself notes that the supply figure is an 'estimate' and that further work is needed to assemble sites, relocate existing uses, and plan for new infrastructure.

In combination the uncertainty regarding windfalls, Broad Locations for Growth and allocations means that there is a very real possibility that the plan will fail to meet its minimum housing requirement. This is a clear soundness issue with the plan.

Distribution of Housing Supply by Sub-Area

Table 2 of the Sheffield Plan identifies the distribution of large sites with planning permission and allocations by sub-area. This is partially replicated below.

Figure 2: Distribution of Housing Supply by Sub-Area

Sub-Area	Potential number of Homes 2022-2039	% of Allocations
Central	18,465	67.2
Northwest	1,015	3.7
Northeast	965	3.5
East	2,940	10.7
Southeast	1,640	6.0
South	750	2.7

Southwest	755	2.7
Stocksbridge/Deepcar	928	3.4
Chapelton/High Green	25	0.1
Total	27,483	100

Source: Table 2 Sheffield Plan

The distribution identifies a clear focus upon the central area which will provide circa 2/3rds of the identified supply. Whilst we do not dispute the need to deliver a significant quantum of development in this location it is likely that much of this development will be in the form of 1 or 2-bed apartment schemes. The July 2019 Sheffield and Rotherham Strategic Housing Market Assessment (SHMA) identified a considered that the plan will provide the relevant mix of homes to meet market demand. Table 8.1 of the SHMA provides an indication of the future demand for properties of different types, sizes, tenure and locations. This suggests that in Sheffield 28% of the future demand will be for a detached property and 35% a semi-detached property. Comparatively only 20% of demand will be for flats/apartments. The focus upon the central area, at the expense of other areas, such as Chapelton/High Green, means that this demand is unlikely to be met. The net effect is likely to increase competition and prices for larger detached and semi-detached properties and push some residents out of the area to find suitable accommodation. The distribution clearly demonstrates the disparity of large site permissions and allocations within Chapelton/High Green compared to other areas. This sub-area which includes a Principal Town receives less than 0.1% of the housing requirement. This is considered disproportionately low and is not consistent with the identification of Chapelton/High Green as a Principal Town. As discussed within our comments upon policies SA9 and SP2 this is largely due to the Council's reluctance to release Green Belt unless it is a sustainably located brownfield site.

The Council's 'Site Selection Methodology' considered just three sites in Chapelton/High Green. This is considered insufficient and other sites such as our clients should have been assessed.

Chapelton/High Green was identified as having a population of 22,543 in 2021. The provision of, on average (including potential windfalls) of just 8 dwellings per year, over the plan period is inconsistent with the designation of the area as a Principal Town or the popularity of the area as a place to live.

Within our comments upon Policy SA9 we identify that even if the two allocated sites are policy compliant this would only deliver a maximum of 3 additional affordable dwellings within Chapelton/High Green. This will do little to meet local needs. Furthermore, in accordance with draft Policy NC4 there would be no wheelchair adaptable dwellings delivered in the area and only 25 accessible and adaptable dwellings. Thus, extremely limited development which would enable independent living. It is notable that in 2021 nearly 1/3rd of the Chapelton/High Green population was already 60 or older. This represents over 7,300 persons who may need accessible and adaptable dwellings.

The area is also more suited to the delivery of semi-detached and detached homes and as such could help to meet some of the identified demand within the SHMA. The plan is currently unclear how the need and demand for affordable housing, the older population and semi-detached / detached properties will be accommodated within Chapelton/High Green.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above:

Given the significant lack of allocations and or other opportunities within this area there is a clear rationale to identify further Green Belt releases in Chapeltown/High Green. As discussed in our response to Policy SA9 we consider that our client's site could be developed with minimal impact upon the Green Belt and its purposes. Furthermore, the allocation of our client's site would assist in providing a small buffer to aid the plan in meeting its housing requirement. Without this and further allocations the plan will fail to meet its already artificially low housing requirement and is, therefore, considered unsound. We recommend that additional allocations, including our clients are provided and particularly within the Chapeltown/High Green sub-area.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s):

Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To ensure that the Inspector is fully aware of our clients concerns and to respond to any additional issues raised by the Council or third parties.

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: Sheffield Local Plan: Draft Local Plan Consultation
Date: 15 February 2023 16:10:56
Attachments: [8a2e0116-6176-43b9-9e42-dadfd8e5e6e6.png](#)
[image671596.png](#)
[R001_Avant.Publication.Draft.Sheffield.Plan.Feb23.pdf](#)
[P21-3683_Springwood.Lane.Promotion.Doc.Rev.B.pdf](#)

Dear Sir / Madam,

Please find attached a copy of our representations made upon the Publication Draft of the Sheffield Local Plan. These have also been submitted via the on-line consultation system but are included here for completeness. In addition, I also provide a copy of the Promotional Document referred to within our representations.

I would be grateful if you could confirm safe receipt in due course.

Kind regards,



Matthew Good
Director



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Publication Draft Sheffield Plan.

Springwood Lane, Sheffield.

On behalf of Avant Homes Yorkshire.

Date: February 2023 | Pegasus Ref: P21-3683

Author: MG



Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
01	January 23	MG	MG	Client comments
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1. Introduction

- 1.1. The following comments are submitted on behalf of 'our client' Avant Homes Yorkshire. Pegasus Group and our client welcome this opportunity to engage with the Council at this stage of plan making. Our client is keen to work collaboratively with the Council to ensure that a sound and robust plan is submitted for examination which provides an appropriate planning framework for Sheffield City Council (SCC). Unfortunately, it is our client's opinion that the plan is currently flawed and therefore unsound.
- 1.2. In making these representations we have taken account of the tests of soundness which will be applied to the local plan when it is examined by the local plan inspector. Paragraph 35 of the NPPF confirms that plans would be considered sound if they are:
 - **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;
 - **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - **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 the policies in this Framework.
- 1.3. Our client has an interest in Land at Springwood Lane, High Green, Sheffield. A promotional document accompanies these submissions. This document illustrates that our client's site provides a deliverable opportunity with limited impacts within a sustainable location. Our client is a housebuilder with a clear track record of deliver across the region.
- 1.4. The following response is provided to selected policies and issues identified within the Publication Draft of the Sheffield Plan.

2. Vision, Aims and Objectives

Vision

The vision is unsound as it is not effective.

- 2.1. Whilst our client generally supports the vision we do not consider that the plan overall will be effective in ensuring that the vision is realised. Our client has particular concern in relation to paragraph 2.9. This element of the vision identified that:

“The city will provide a good quality housing offer meeting the needs of different household types and sizes”.

- 2.2. Within our comments upon policies SP1, SP2, SA9 and H1 we provide greater detail upon this issue. It is, however, considered that the plan is too heavily weighted towards city / edge of city urban regeneration sites. Whilst we do not dispute the need for such allocations we consider that the plan fails to meet the needs of families who wish to live outside of the city in settlements such as High Green and Chapeltown. It also fails to take account of its own economic viability evidence.
- 2.3. In order to overcome this issue it is recommended that additional allocations are identified within the High Green / Chapeltown area.

Objectives

The objectives are unsound as they are not effective.

- 2.4. Our client is generally supportive of most of the objectives. The key concern relates to the objectives concerning thriving neighbourhoods and communities. These objectives include:
- 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.
 - To significantly increase the supply of affordable housing, accessible market housing and specialist housing for older people, disabled people and other vulnerable groups, particularly in places of greatest need.
 - To create neighbourhoods that work for everyone, with a mix of housing and access to a range of local facilities, services and open space, offering all residents the best life chances.
- 2.5. Whilst in themselves the objectives are considered laudable the plan will not deliver them. All these issues are discussed in greater detail within our comments upon specific policies. However, in summary, we consider that the:
- Housing requirement is inadequate to meet the needs of the area, including affordable homes,



- Housing supply will not deliver the identified housing requirement due to a lack of deliverable sites, and
- Mix of identified sites will not meet the needs of the whole community.

2.6. The required amendments to the plan are set out within our comments upon the relevant policies but include a higher housing requirement and greater mix of sites, including with the High Green / Chapeltown area.

3. Growth Plan and Spatial Strategy

Policy SP1: Overall Growth Plan

The policy is unsound as it is not positively prepared, justified or consistent with national policy.

The Council has failed to effectively address the duty to co-operate in relation to housing need

3.1. Part 'a' of the policy identifies that the Sheffield Plan will deliver 35,530 new homes by 2039. This equates to an annual average delivery rate of 2,090 homes from 2022 to 2039. This is significantly below the figure identified by the standard method as set out within the Planning Practice Guidance (PPG). The following discussion considers the issues of housing need, the housing requirement and the Council's responsibilities under the duty to cooperate. Each is discussed in turn below.

Housing Need

3.2. In accordance with paragraph 61 of the NPPF the minimum number of homes required within a local authority area is determined via the standard method outlined in the PPG. The current standard method identifies a four-step approach to determining local housing need. These steps are:

- **Step 1: Setting the baseline** – this takes the average rate of growth over 10-year period from the 2014-based household projections in England
- **Step 2: Affordability adjustment** – this adjusts the household projections by applying an adjustment based upon the most recent median workplace-based affordability ratio.
- **Step 3: Capping the level of increase** – this caps the level of increase in step 2 at 40% based upon the higher of the household projections or local plan target¹
- **Step 4: Cities and urban centres uplift** – this applies a further 35% uplift to the urban local authorities in the top 20 cities and urban centres list.

3.3. All four steps are relevant to Sheffield as this is one the top 20 cities and urban centres. The following table identifies the current minimum LHN figure, using a 2022 base date.

Figure 1: Sheffield Local Housing Need (per annum)

Step	Dwellings
1. Setting the baseline	1,972
2. Affordability adjustment	2,236

¹ Dependent upon the age of the Local Plan

3. Capping the level of increase	2,236
4. Cities and urban centres uplift	3,018
Sheffield LHN	3,018

- 3.4. The minimum LHN requirement is 928dpa greater than the housing requirement proposed within the Sheffield Plan. This is 15,776 dwellings over the plan period. This is a significant and unjustified shortfall.
- 3.5. Both the NPPF and Planning Practice Guidance (PPG) identify that the LHN calculated via the standard method is a minimum requirement. Housing requirements set below the minimum requirement will require exceptional circumstances to be demonstrated. Neither the Sheffield Plan nor its evidence base clearly identify these exceptional circumstances. The requirement is, therefore, unjustified.
- 3.6. The Council’s only evidence in relation to housing need is the 2021 Icen Projects paper ‘Housing, Economic Growth and Demographic Modelling’. This paper whilst considering the 2018-based subnational population projections does not consider whether an uplift is required to assist with issues such as affordability, affordable housing delivery or concealed households.

2018-based subnational population projections

- 3.7. These projections are used throughout the Icen Projects paper without justification or the demonstration of exceptional circumstances. The PPG (ID 2a-005-20190220) is clear that the 2014-based household projections are used in the standard method to provide stability and ensure that ‘historic under-delivery and declining affordability are reflected’ as well as being consistent with the ‘Government’s objective of significantly boosting the supply of homes’.
- 3.8. The PPG further notes that any:
“...method which relies on using household projections more recently published than the 2014-based household projections will not be considered to be following the standard method”. (PPG ID 2a-015-20190220)
- 3.9. In such cases and in particular, where a lower requirement is identified, the Council will be required to demonstrate exceptional circumstances. No such evidence is provided within the Icen Projects paper.

Uplifts to the Household Projections

- 3.10. The key focus of the ‘Housing, Economic Growth and Demographic Modelling’ paper is an attempt to link projected jobs growth and housing growth. This is an imprecise science based upon several changeable assumptions in relation to issues such as projected jobs growth, economic participation rates, double-jobbing and commuting patterns. Table 7.5 of the paper identifies a range of 1,556dpa to 2,323dpa, indicating how amendments to these assumptions can have a profound effect upon the housing need identified.
- 3.11. Paragraph 9.13 to 9.15 of the report concludes that:

“Modelling the required labour supply increase linked to these forecasts suggests a need for up to 2,323 dwellings per annum although this could be reduced by around 300 dpa to 1,994 dpa, if further improvement to economic activity rates could be achieved.”

As all these figures are lower than the Standard Method (2,923 dwellings per annum) there is no reason to exceed this level of housing growth to meet the economic needs of the city. Furthermore the standard method also generates an excess level of economically active population in comparison to economic forecasts.

Notably, there is a better balance between housing growth using the older version of the standard method i.e. without the urban centres uplift (Step 3 – 2,165 dpa) and the ranges suggested to meet the highest of the economic growth herein (1,794 to 2,323 dpa).”

3.12. These paragraphs appear to presume that the economic forecasts are set and the only variable which should be considered in relation to housing need. The paper also fundamentally misunderstands the reasoning behind step 2 ‘affordability adjustment’ and step 4 ‘cities and urban centres uplift’ of the LHN calculation.

3.13. Step 2 is provided as the Government recognises that household growth projections on their own are an insufficient indicator of future housing need. In response to this the median workplace-based affordability ratio are utilised to provide an appropriate uplift. The PPG identifies that this is required because:

“household formation is constrained to the supply of available properties – new households cannot form if there is nowhere for them to live; and people may want to live in an area in which they do not reside currently, for example to be near to work, but be unable to find appropriate accommodation that they can afford.” (PPG ID 2a-006-20190220).

3.14. The Government’s uplift, therefore, seeks to take account of past constraints on household formation rates and the need and demand for homes within an area to enable people to live near to where they work. The Iceni Projects paper completely fails to take these elements into account.

3.15. In terms of step 4 the Iceni Projects paper fails to deal with the Government’s rationale and reasoning for step 4 of the LHN calculation, the ‘cities and urban centres uplift’. The cities and urban centres uplift was first introduced in 2020 through amendments to the PPG following the Government’s consultation upon ‘Changes to the current planning system’. The rationale for this its introduction is set out within the Government’s response to this consultation and was threefold, this being:

- building in existing cities and urban centres ensures that new homes can maximise existing infrastructure such as public transport, schools, medical facilities and shops,
- there is potentially a profound structural change working through the retail and commercial sector, and we should expect more opportunities for creative use of land in urban areas to emerge, and
- climate aspirations demand that we aim for a spatial pattern of development that reduces the need for unnecessary high-carbon travel.

3.16. A figure of 35% was chosen to ensure:

"...consistency with the government's Manifesto commitment to see 300,000 homes per year delivered by the mid 2020s..."

- 3.17. The Government's rationale was also clear that the increase in the number of homes to be delivered is expected to be met by the cities and urban centres themselves (i.e. Sheffield) rather than the surrounding areas.
- 3.18. Whilst not explicit it is clear through a reasonable interpretation of the Government's rationale for the introduction of the uplift that this was required to meet the wider needs of the country and meet the target of delivering 300,000 homes per year by the mid 2020s.
- 3.19. The PPG largely re-iterates many of the above points.
- 3.20. It is noted that the Government recently commenced a consultation upon potential changes to the NPPF. This consultation 'Levelling-up and Regeneration Bill: Reforms to national planning policy' does not suggest amendments to the NPPF but does seek to elevate the cities and urban centres uplift into policy. This change would effectively strengthen the Government's commitment to these settlements delivering additional housing growth.
- 3.21. Paragraph 14 identifies that the cities and urban centres uplift:
- "...supports our approach to making the best use of brownfield land. The method for calculating local housing need was amended in 2020 to apply an uplift of 35% for the 20 largest towns and cities, in recognition of this potential. The government intends to maintain this uplift and to require that this is, so far as possible, met by the towns and cities concerned rather than exported to surrounding areas, except where there is voluntary cross-boundary agreement to do so (for example through a joint local plan or spatial development strategy). It will be important to capitalise on opportunities to further densify in these already-developed urban areas, using local design codes to do so in ways that take account of the existing environment."*
- 3.22. Both the response to the previous consultation and the current consultation clearly demonstrates the Government's desire for the countries largest cities and urban centres to play their part in meeting the housing needs of the country. This uplift first introduced in 2020 was a clear diversion from previous policy and sought a step-change in delivery within our main cities and urban areas.
- 3.23. In stating that:
- "...the standard method also generates an excess level of economically active population in comparison to economic forecasts."*
- The Icen Projects paper completely fails to grapple or understand this issue.
- 3.24. Once again the Icen Projects paper fails to identify exceptional circumstances to not consider the uplifts identified in the LHN standard method, this is unsound.

Other Factors

- 3.25. The PPG (ID: 2a-O10-20201216 and 67-008-20190722) also identifies a non-exhaustive list of instances where the minimum requirement should be exceeded. These include:

- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g., Housing Deals);
- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally;
- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;
- Past levels of delivery or previous assessments of need; or
- To assist in meeting the need for affordable housing.

3.26. Most of these issues are simply ignored. Arguably the only elements which are considered are growth strategies, by taking account of economic projections and agreeing to take unmet need from a neighbouring authority. In terms of the latter point it is noted that paragraph 3.7 of the Sheffield Plan is clear that it is not relying on other local authorities in the city region to meet any of its housing needs and Sheffield does not intend to meet any housing needs arising elsewhere in the city region. This issue is discussed further below.

3.27. In terms of affordable housing the Council’s 2019 Sheffield Strategic Housing Market Assessment (2019 SHMA) identifies a need for 902 additional affordable homes per year. The delivery of affordable housing is not considered within the Iceni Projects paper, or indeed elsewhere within the evidence supporting the current consultation on the plan. The NPPF identifies that the needs of groups with specific housing requirements are addressed (paragraph 60).

3.28. The identified 2019 SHMA requirement represents more than 43% of the proposed housing requirement, nearly 39% of the upper end of the identified Iceni Projects need and almost 30% of the LHN. Whilst it is recognised that the provision of affordable housing via market schemes is not the only method of delivery, greater levels of market provision would assist in meeting more of this need.

3.29. Figure 1 below identifies affordable housing delivery within Sheffield between 2015/16 and 2021/22. This is compared against overall net housing delivery. The Council has performed abysmally in meeting the affordable housing need identified in the SHMA. Indeed, it has only delivered 1,363 affordable dwellings, since 2015/16. This represents less than 10% of the overall housing delivery over the period and is significantly less than the 902 affordable dwellings per year identified in the 2019 SHMA.

3.30. In addition, as discussed within our comments against Policy H1 it is notable that the Council’s ‘Whole Plan Viability Assessment’ suggests that large areas of the Sheffield Plan area are unviable even with a 0% contribution to affordable housing. This makes the delivery of 902 affordable homes per year highly unlikely.

Figure 1: Housing Delivery

Year	15/16	16/17	17/18	18/19	19/20	20/21	21/22

Affordable ²	305	327	99	165	129	207	131
Total Dwellings ³	1,589	2,248	2,304	1,976	3,083	1,850	1,774
% Affordable	19	15	4	8	4	11	7

3.31. Based upon the above discussion the Council has failed to identify the required exceptional circumstances to deviate from the standard method for determining its LHN. The plan and its evidence is, therefore, considered unsound as it is not positively prepared, justified, consistent with national policy or effective.

Housing Requirement

3.32. The proposed housing requirement of 2,090dpa is not justified by any of the evidence supporting the Sheffield Plan. As already discussed, the LHN standard method produces a figure of 3,018dpa and the disputed Iceni Projects report figures of 1,794 to 2,323dpa. None of these figures represent the proposed housing requirement of 2,090dpa.

3.33. The justification for this figure is unclear, other than a brief reference to being set to reflect the capacity of the existing urban areas and the restrictions imposed by the Green Belt (Sheffield Plan, paragraph 3.8). However, this is not justified in the evidence. The lack of justification makes the housing requirement unsound.

Duty to Cooperate

3.34. The NPPF, paragraph 24, is clear that:

“Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.”

3.35. Furthermore, it goes on to note (paragraphs 26 and 27) that this cooperation should be effective. Given that housing need is an issue which transcends boundaries consideration must be given to assisting neighbouring authorities meet any unmet needs. The scale of the assistance should be proportionate and based upon evidence not only of the scale of the need but also the capacity to accommodate such need.

3.36. The Sheffield Plan (paragraph 3.7) identifies that:

“Sheffield is not relying on other local authorities in the city region to meet any of its housing needs and Sheffield does not intend to meet any housing needs arising elsewhere in the city region.”

² Source: DHLUC Table 1011C

³ Source: DHLUC Table 122

3.37. The Council's December 2022 'Duty to Cooperate Position Statement' identifies that:

"The sub-regional SoCG will provide context around the number of homes currently being planned for across the area in comparison to the Government's targets, and how many homes are being delivered..." (paragraph 2.6) and "This evidence and sub-regional context will form the basis for Sheffield's SoCG, in which authorities will be asked to confirm that housing delivery will continue to contribute to overall housing needs across the wider area..." (paragraph 2.7).

3.38. The above text from 'Duty to Cooperate Position Statement' appears contrary to the position stated in the Sheffield Plan. Furthermore, the 35% cities and urban centres uplift is intended to be delivered within the cities and urban areas themselves.

3.39. The current SoCG was published in 2019 and fails to address the current LHN calculation for Sheffield. It is, therefore, unclear who or how any unmet housing need from Sheffield would be addressed or even if it has been adequately considered. This is considered a failing under the duty to cooperate.

Policy SP2: Spatial Strategy

The policy is unsound as it is not justified or effective.

3.40. The policy identifies that the majority of future growth will be on previously developed sites within existing urban areas. These are the Main Urban Area of Sheffield, and the two Principal Towns of Stocksbridge/Deepcar, and Chapeltown/High Green.

3.41. The identification of these areas as the main focii of growth is supported and considered appropriate, given the clear sustainability credentials of these settlements / areas. However, as discussed in relation to Policy H1 the very limited number of residential allocations (25 dwellings) within Chapeltown/High Green effectively restricts development within this Principal Town. This will mean that localised needs emerging from within the settlement are not met and will need to be met elsewhere and that the settlement fails to fulfil its role within the settlement hierarchy.

3.42. The lack of allocations within Chapeltown/High Green is largely due to the Council's Cooperative Executive decision on 16th February 2022 to restrict development to suitable brownfield and previously undeveloped (greenfield) sites in the existing urban areas and limit Green Belt releases to sustainably located brownfield sites.

3.43. Whilst the focus upon previously developed sites within existing urban areas is not disputed, this should not be at the expense of meeting the wider needs of the city and individual settlements. This is a particular issue in the case of Chapeltown/High Green which is tightly constrained by its existing Green Belt boundary and has few brownfield opportunities.

3.44. Given the clear constraints and lack of opportunities within Chapeltown/High Green it is considered that the release of limited greenfield Green Belt sites is justified and provides the exceptional circumstances required. The failure to provide such alternatives will limit the opportunities for existing and future residents of Chapeltown/High Green to access appropriate accommodation, including affordable housing.



- 3.45. It is, therefore, recommended that additional Green Belt allocations are provided within Chapeltown/High Green.

4. Sheffield's Sub-Area Strategy

Chapelton/High Green Sub-Area – Policy SA9

The policy is unsound as it is not justified or effective.

- 4.1. The identification of Chapelton/High Green as a Principal Town is supported and considered appropriate given the sustainability of the settlement and the facilities and services provided. However, as discussed against other policies the lack of allocations (25 dwellings) within the plan mean that localised needs emerging from within the settlement are not met and will need to be met elsewhere and that the settlement fails to fulfil its role within the settlement hierarchy.
- 4.2. The policy also identifies that 101 dwellings will be delivered through small sites and a further 20 dwellings through a large site with permission in the north east. This equates to just 145 dwellings in the Ecclesfield Neighbourhood Plan Area. There is no discussion or consideration of whether the small sites identified are likely to deliver or whether this is sufficient to meet the needs of the area. Furthermore, no clarity is provided as to whether the Neighbourhood Plan, if progressed, should seek to deliver this or a greater quantum of housing. It is our clear view that further allocations should be made within the sub-area through the Sheffield Plan.
- 4.3. The lack of housing delivery within Chapelton/High Green will have serious implications for affordable housing delivery within the area. Draft Policy NC3 of the Sheffield Local Plan identifies that 10% of all homes on qualifying new sites will be affordable. The site size threshold for affordable housing provision is identified as 10 or more dwellings. Given that 101 of the 145 dwellings identified will be small sites, these are unlikely to provide any affordable housing. The two proposed allocations in Chapelton/High Green, site references CH01 and CH02, will deliver 10 and 14 homes respectively. If these sites are policy compliant this a maximum of 3 affordable dwellings will be delivered in the Chapelton/High Green area over the plan period.
- 4.4. Within our response to Policy SP1 and demonstrate in figure 1 there is a significant need for affordable housing across Sheffield and the Council's track record of delivery has been poor. The lack of potential to address affordable housing needs within areas such as Chapelton/High Green will only exacerbate this already dire situation.
- 4.5. The policy also seeks to protect existing Green Belt boundaries. Whilst the importance of the Green Belt is not disputed this should be 'balanced' against the need to deliver homes to meet housing needs and retain the vitality of the settlement. As discussed within our comments upon Policy SP1 the Sheffield Plan is significantly short of meeting the LHN for the whole area. This will not assist in meeting the substantial need for affordable housing across the city. The lack of allocations and delivery within Chapelton/High Green is likely to exacerbate such issues in this locality.
- 4.6. This could be easily rectified by taking a more balanced approach to the Green Belt in the sub-area. As discussed within our comments upon Policy SP2 Chapelton/High Green is tightly constrained by its existing Green Belt boundary and has few brownfield opportunities. This lack of opportunities on non-Green Belt sites means that existing and future residents of Chapelton/High Green will be unable to access appropriate

accommodation, including affordable housing provides. It is considered that this, and the identification of Chapeltown/High Green as a Principal Town provides the exceptional circumstances required to release further Green Belt sites in this location.

- 4.7. Our client's site Land at Springwood Lane, High Green (see accompanying promotional document) sits within parcel CN-2 of the Council's 'Green Belt Review'. This is a large parcel of land which extends from the edge of High Green to the A61. The Green Belt Review identifies that this parcel scores poorly (2 out of 5) in relation 'to check the unrestricted sprawl of large built-up areas' (purpose 1) and 'to prevent neighbouring towns from merging' (purpose 2). Indeed, this parcel is the lowest scoring of all Green Belt parcels in Chapeltown North.
- 4.8. Whilst the parcel scores higher with regards the other purposes of 'to assist in safeguarding the countryside from encroachment' (purpose 3) and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land' (purpose 5) this is common of all other parcels in the study. This is recognised within the Green Belt Review at paragraph 6.20 and as such purposes 1 and 2 are considered critical.
- 4.9. Stage 2 of the Green Belt Review undertakes a more fine-grained approach and our client's site falls within parcel CN-2-c. Once again, whilst still a large parcel, this is one of the lowest scoring of the Green Belt assessment parcels. Scoring moderately against 'to check the unrestricted sprawl of large built-up areas' (purpose 1) and low against 'to prevent neighbouring towns merging into one another' (purpose 2). Against these 'critical purposes' the parcel scores just 4 out of 10. Our evidence (see accompanying promotional document) suggests that our client's site would have limited impact upon either of these issues and indeed would provide a clear defensible boundary to stop any encroachment into the countryside.
- 4.10. Our client's site is, therefore, the most credible option for a new site within the Chapeltown/High Green area. Delivery of our client's site would enable the provision of a mix of housetypes and tenures and would go some way to meeting the needs within the area.
- 4.11. It is, therefore, recommended that additional Green Belt allocations are provided within Chapeltown/High Green. As demonstrated by our supporting evidence our clients site is in a sustainable location and fulfils very few Green Belt purposes and therefore could be released without significantly impacting upon the Green Belt.

5. Topic Policies – Housing

Policy H1: Scale and Supply of New Housing

The policy is unsound as it is not effective or positively prepared.

Emphasis on previously developed land

- 5.1. The Sheffield Plan and the policy has a strong emphasis on the delivery of housing on previously developed land. Identifying a target of 85% on previously developed land over the plan period (2022 to 2039). Whilst a laudable aim this must be balanced against the prospect of delivery.
- 5.2. In this regard the Council has undertaken a 'Whole Plan Viability Assessment', published in September 2022. This assessment is necessarily 'broad brush' and is reliant upon several assumptions. Whilst our client does not seek to dispute these assumptions at this stage it should be recognized that changes to the assumptions can have a significant impact upon the outputs from the assessment. This could occur for a variety of reasons including continued increases to build costs. Paragraph 10.68 of the assessment recognizes that an above 5% increase in build costs is likely to render most of the sites identified within the plan unviable. This is a significant concern and threatens the deliverability of the Sheffield Plan.
- 5.3. The assessment, table 12.8, identifies large swathes of brownfield land across the plan area is unviable even at current build costs and with a 0% affordable housing contribution. Given that the Council is reliant upon these areas to deliver a significant quantum of the housing growth this places the delivery of the whole plan in jeopardy. Furthermore, placing a significant amount of housing growth in areas of the city which, based upon the Council's own evidence, cannot sustain affordable housing delivery would be contrary to the plan vision and objectives which seek to 'significantly increase the supply of affordable housing'.

Sources of Supply

- 5.4. Table 1 of the Sheffield Plan identifies the sources of housing land supply over the plan period. This identifies that up to 35,558 dwellings could be delivered. This is a buffer of just 28 dwellings, or less than 0.1%, over the housing requirement. This requires almost all the identified sources of supply to deliver in full over the plan period, allowing very little room for slippage or non-delivery.
- 5.5. The viability issues discussed above already cast doubt upon whether the proposed allocations will deliver in full. However, this is exacerbated by the fact that 8,075 dwellings of the supply are made up from a small windfall allowance of 200 dwellings per annum (3,400 dwellings) and an 'estimated supply' of 4,675 dwellings from 'Broad Locations for Growth'.
- 5.6. Whilst, at this stage, we do not wish to dispute the windfall allowance the NPPF (paragraph 71) is clear that this must be based upon:

"...compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends."

- 5.7. The relevant evidence of both past rates and future supply should be provided prior to examination of the plan. This is imperative given that the plan is reliant upon this source to meet its identified minimum requirement.
- 5.8. In terms of 'Broad Locations for Growth' there is currently little to no evidence that these areas will deliver the quantum of development identified within table 1 of the Sheffield Plan. Indeed, the plan itself notes that the supply figure is an 'estimate' and that further work is needed to assemble sites, relocate existing uses, and plan for new infrastructure.
- 5.9. In combination the uncertainty regarding windfalls, Broad Locations for Growth and allocations means that there is a very real possibility that the plan will fail to meet its minimum housing requirement. This is a clear soundness issue with the plan.

Distribution of Housing Supply by Sub-Area

- 5.10. Table 2 of the Sheffield Plan identifies the distribution of large sites with planning permission and allocations by sub-area. This is partially replicated below.

Figure 2: Distribution of Housing Supply by Sub-Area

Sub-Area	Potential number of Homes 2022-2039	% of Allocations
Central	18,465	67.2
Northwest	1,015	3.7
Northeast	965	3.5
East	2,940	10.7
Southeast	1,640	6.0
South	750	2.7
Southwest	755	2.7
Stocksbridge/Deepcar	928	3.4
Chapelton/High Green	25	0.1
Total	27,483	100

Source: Table 2 Sheffield Plan

- 5.11. The distribution identifies a clear focus upon the central area which will provide circa 2/3rds of the identified supply. Whilst we do not dispute the need to deliver a significant quantum of development in this location it is likely that much of this development will be in the form of 1 or 2-bed apartment schemes. The July 2019 Sheffield and Rotherham Strategic Housing Market Assessment (SHMA) identified a considered that the plan will provide the relevant mix of homes to meet market demand. Table 8.1 of the SHMA provides an indication of the future demand for properties of different types, sizes, tenure and locations. This suggests that in Sheffield 28% of the future demand will be for a detached property and 35% a semi-detached property. Comparatively only 20% of demand will be for flats/apartments.
- 5.12. The focus upon the central area, at the expense of other areas, such as Chapeltown/High Green, means that this demand is unlikely to be met. The net effect is likely to increase competition and prices for larger detached and semi-detached properties and push some residents out of the area to find suitable accommodation.
- 5.13. The distribution clearly demonstrates the disparity of large site permissions and allocations within Chapeltown/High Green compared to other areas. This sub-area which includes a Principal Town receives less than 0.1% of the housing requirement. This is considered disproportionately low and is not consistent with the identification of Chapeltown/High Green as a Principal Town. As discussed within our comments upon policies SA9 and SP2 this is largely due to the Council's reluctance to release Green Belt unless it is a sustainably located brownfield site.
- 5.14. The Council's 'Site Selection Methodology' considered just three sites in Chapeltown/High Green. This is considered insufficient and other sites such as our clients should have been assessed.
- 5.15. Chapeltown/High Green was identified as having a population of 22,543 in 2021. The provision of, on average (including potential windfalls) of just 8 dwellings per year, over the plan period is inconsistent with the designation of the area as a Principal Town or the popularity of the area as a place to live.
- 5.16. Within our comments upon Policy SA9 we identify that even if the two allocated sites are policy compliant this would only deliver a maximum of 3 additional affordable dwellings within Chapeltown/High Green. This will do little to meet local needs. Furthermore, in accordance with draft Policy NC4 there would be no wheelchair adaptable dwellings delivered in the area and only 25 accessible and adaptable dwellings. Thus, extremely limited development which would enable independent living. It is notable that in 2021 nearly 1/3rd of the Chapeltown/High Green population was already 60 or older. This represents over 7,300 persons who may need accessible and adaptable dwellings.
- 5.17. The area is also more suited to the delivery of semi-detached and detached homes and as such could help to meet some of the identified demand within the SHMA. The plan is currently unclear how the need and demand for affordable housing, the older population and semi-detached / detached properties will be accommodated within Chapeltown/High Green.
- 5.18. Given the significant lack of allocations and or other opportunities within this area there is a clear rationale to identify further Green Belt releases in Chapeltown/High Green. As discussed in our response to Policy SA9 we consider that our client's site could be developed with minimal impact upon the Green Belt and its purposes. Furthermore, the



allocation of our client's site would assist in providing a small buffer to aid the plan in meeting its housing requirement. Without this and further allocations the plan will fail to meet its already artificially low housing requirement and is, therefore, considered unsound. We recommend that additional allocations, including our clients are provided and particularly within the Chapeltown/High Green sub-area.

6. Opportunity: Springwood Lane, High Green

- 6.1. High Green is a major settlement and important town within the suburbs of north Sheffield. It is correctly identified as a Principal Town within the Sheffield Plan settlement hierarchy. It is important that developments within this locality are provided to meet the demands of the growing population. Whilst an emphasis upon urban and brownfield sites is considered acceptable the lack of alternative sites within High Green means that greenfield sites adjacent to the existing development boundary should also be considered.
- 6.2. The proposed site at Springwood Lane provides logical development site which would assist in meeting the housing needs not only of High Green but also of the wider area, including much needed affordable housing. The parcel is self-contained and would provide a strong new defensible edge to the Green Belt in this location.
- 6.3. The site is in a sustainable location close to services and facilities and within easy reach of public transport opportunities and will promote walking and cycling. The development would respect and complement both the landscape setting and the informal woodland setting of Spring Wood, whilst strengthening the physical connection and visual relationship between both.
- 6.4. The accompanying promotional document provides further details on the proposed scheme.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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SPRINGWOOD LANE

High Green, S35 4JQ
Site promotion document

January 2023



AVANT
homes

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INTRODUCING SPRINGWOOD LANE

Our ethos centres on creating places and communities, not just housebuilding. This setting offers us an opportunity to create a unique place that future residents can call home.

The site presents a wonderful opportunity for the provision of new housing (circa 184 dwellings) within the wider setting of High Green and Chapeltown. It enjoys a highly prominent location near to key infrastructure – Chapeltown train station and the M1, other vehicular routes and pedestrian links.

The site at Springwood Lane is a logical location for growth within High Green. The development will have a strong sense of belonging to the existing town promoted by landscape and townscape features that draw upon the wealth of distinctive local character while responding appropriately to its sensitive rural edges.

The unique setting of the site will be exploited by drawing green space into the scheme providing the opportunity to create a new distinctive, high quality neighbourhood for the town.



Springwood Lane Vision

Our vision is for the sensitive expansion of High Green through a complementary, integrated and sustainable new neighbourhood that offers housing to suit the needs of a wide range of people – in a place that they want to live as part of a vibrant, historic suburb of Sheffield.

Our objective is to produce an exemplar, healthy community, promoting indoor, outdoor living for all; with a variety of places and spaces for interaction or quiet contemplation; where every home looks onto a beautiful place. A balanced community for all to enjoy, with homes in a variety of sizes and tenures to meet the needs and aspirations of people at different stages of their lives.

The new neighbourhood at Springwood Lane will be a thriving community where people want to live and spend time; a sustainable place that connects people and nature, encourages community spirit and a strong sense of belonging, building on the qualities that make High Green a special and unique place already.

The development will celebrate and enhance the unique characteristics of the site, while protecting and further enhancing what it is that makes it special. To deliver exemplary architecture and landscape design, but more importantly, to create a place with real character that will grow and support a thriving new community.



Site location aerial from Google Maps

Key Objectives

- » The vision is encompassed by informal landscape networks with sustainable urban drainage systems, ponds, recreation spaces, and pedestrian footpaths and cycle links to connect and integrate with High Green and Chapeltown, the wider community and surrounding area.
- » Reinforcing the site as a place that can culture interaction between new and existing communities, allowing for the new neighbourhood to grow organically through good linkages and provision of open space.
- » Make spaces and routes easily accessible and navigable with a strong emphasis on natural orientation and legibility.
- » Protect, conserve and enhance local ecologies and promote biodiversity within the layout and make wider links into the existing green infrastructure resource to encourage strong linkages and dedicated ecological pathways.

INTRODUCTION

Background

This document is prepared to demonstrate that the site at Springwood Lane is a suitable and deliverable housing allocation within a sustainable area.

The purpose of this document is to provide an overview of how the site at Springwood Lane could accommodate housing development for consideration in the next iteration of the emerging Local Plan.

Avant Homes is keen to open a dialogue with the Council to identify how the site at Springwood Lane could facilitate the proposals.

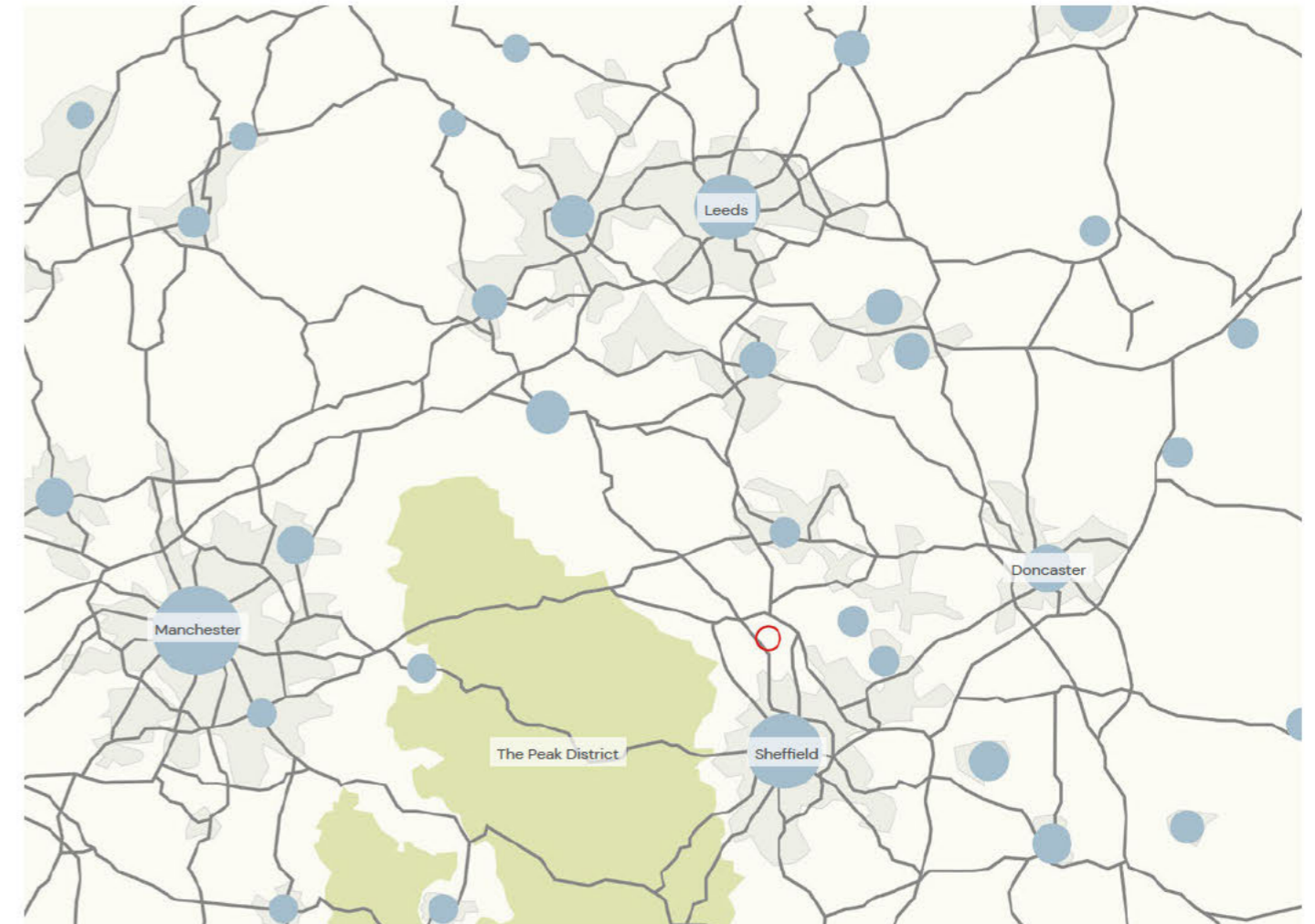
This document also demonstrates how the site could be delivered to provide new housing in a sustainable location within the High Green area. The strategy demonstrates that the site can be accessed safely and how the development can reflect and respond to its existing surroundings, including existing landscape features.

Furthermore the document sets out the overarching design narrative and design principles,



SITE LOCATION

Locating the site



The site area is located immediately to the south of the Sheffield suburb of High Green, which in turn lies approximately 13 kilometres to the north of Sheffield City Centre.

To the north of the site lies Springwood Lane and associated residential areas beyond; with Angram Bank Primary School lying in close proximity to the site, directly across Springwood Lane from the site's northern boundary.

Directly to the east of the site lies an open field – which contains recent, young tree planting – before further residential areas of High Green expand towards the south where Springwood Lane meets Greengate Lane. Directly to the south of the site lies Low Hall Wood and the associated Hall Wood Dike, which runs in an east-west direction within the northern edge of the woodland. Low Hall Wood stretches to the south of the site for approximately

800 metres, and is bisected by the B6546, which joins with Penistone Road to the west. Directly to the west of the site lie further, large fields used for grazing which meet the A61 (Westwood New Road) to the west. A fuelling station (MRH Crown), a pub (The Crown Inn), an equine centre (Westwood Equestrian) and an assortment of large farm buildings cluster at a nearby junction where the A61, the A629 and Penistone Road meet, approximately 350 metres from the site's western boundary. Low Hall Wood merges into Hazelshaw Spring Wood to the west of the site.

- Site location
- Primary routes
- Built form extents
- Key cities and towns

PLANNING POLICY

National Policy

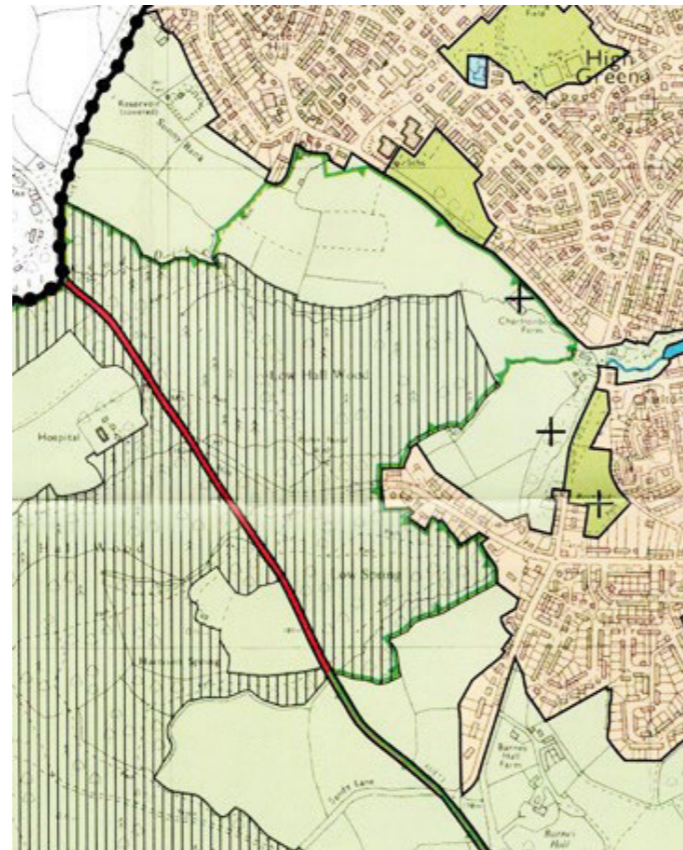
The revised National Planning Policy Framework (NPPF) (July 2021) sets out the Governments' planning policies for England and how these are expected to be applied. The main purpose of the planning system is to contribute to the achievement of sustainable development. There are three dimensions to sustainable development; economic, social, and environmental. Paragraph 15 identifies that Local Plan should be succinct and up to date and provide a positive vision for the future of the area and a framework for addressing, amongst other things, housing needs.

Paragraph 16 states that Plans should:

- » be prepared with the objective of contributing to the achievement of sustainable development
- » be prepared positively, in a way that is aspirational but deliverable; and
- » be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees.

Paragraph 60 of the NPPF states that 'to support the government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.'

Paragraph 68 outlines that strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.



RUDP Policy Map Extract (map 3)

Paragraph 74 sets out that 'Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of 5 years' worth of housing against their housing requirement set out in adopted strategic policies.'

PLANNING POLICY

Adopted Local Plan

The current adopted development plan consists of the Sheffield Core Strategy (adopted March 2009) and 'saved' policies from the Sheffield Unitary Development Plan (1998). The extant Local Plan is now more than five years old, therefore in accordance with the NPPF a new Local Plan is being prepared which will cover the period 2024-2039. The city council has recently undertaken a Regulation 19 consultation on the draft Plan and are hoping to adopt the Plan in December 2024, and this will then supersede the 'saved' policies from the UDP (1998).

Any emerging plan must be prepared in accordance with the Duty to Cooperate, legal and procedural requirements and must be sound. It must be positively prepared, justified, effective, and consistent with national policy. Policy CS 22 of the Core Strategy sets out the scale of the requirement for new housing in the area at an average of 1,425 net additional dwellings per year until 2025/26. year.

The spatial strategy states that 'new development will be concentrated in the main urban area of Sheffield, complemented by Chapeltown/High Green...'. Chapeltown is classed as a 'Principal Town' in the Regional Spatial Strategy.

Policy CS71 states that countryside and other open land around existing built-up areas will be safeguarded by maintaining the Green Belt. However, it does also state that in exceptional circumstances, changes may be made to remove untenable anomalies where the change would not undermine the purposes or objectives of Green Belt in that area.

Emerging Local Plan

The site presents the most suitable site to meet housing need within the Chapeltown / High Green sub area and deliver a suitable mix of houses and provision of policy compliant affordable housing. Policy SP1 of the emerging Local Plan sets out the housing requirement for the area between 2022 and 2039 at 2,100 homes per annum. Chapeltown remains to be considered as a 'Principal Town' in the draft emerging Local Plan. Policy SA9 (Chapeltown/High Green Sub Area) of the emerging Local Plan promotes proposals for housing development in the area.

Ecclesfield Parish Neighbourhood Planning Area

The site falls within the designated neighbourhood planning area of Ecclesfield Parish. They have established a steering group who are currently working towards the preparation of the neighbourhood plan document.

GREEN BELT ASSESSMENT

Green Belt Assessment

The Green Belt Review Document 2020 sets out the process by which Sheffield City Council has assessed the Sheffield Green Belt as part of the preparation of its new Local Plan (the Sheffield Plan). The review will enable spatial opportunities for growth to be identified in order to meet Sheffield's future housing needs.

Paragraph 137 of the NPPF reinforces the importance the government attaches to Green Belts. Their fundamental aim is to prevent urban sprawl by keeping land permanently open and their essential characteristics are openness and permanence.

Paragraph 138 identifies the 5 purposes of Green Belt. Our analysis identifies that the site performs poorly against these purposes:

1) to check the unrestricted sprawl of large built-up areas;

As noted in the Landscape and Visual Note, the site area is well contained by either existing built form or significant woodland cover, with a relatively limited visual envelope. There are clear, defensible boundaries that will restrict sprawl. Existing residential development acts as a boundary to the north and the wider settlement of Chapeltown to the east. Spring Wood (ancient woodland) acts as a boundary to the south and Westwood New Road acts as a boundary to the west. It is important to note that any development would retain a suitable buffer to the ancient woodland.



Sheffield City Council Green Belt Review Document 2020

2) to prevent neighbouring towns merging into one another;

The nearest settlement to the west of the site is Stocksbridge which is located approximately 6.4km from a central point in the proposed development site. The proposed will not lead to the merging of settlements.

3) to assist in safeguarding the countryside from encroachment;

The Landscape and Visual Note states that the western portion of the site (which is closer to the countryside and further away from the existing built form) is less visually sensitive than the eastern portion. Hence, the impacts of 'encroachment' into the countryside would be minimal.

GREEN BELT ASSESSMENT



View looking into the site

4) to preserve the setting and special character of historic towns;

Chapelton/High Green cannot be considered an historic and the proposed development will not affect the setting of any Conservation areas.

5) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land;

All Green Belt boundaries perform this role.

Overall, it is considered that the site will have minimal impact on the Green Belt and performs very limited contribution to the Green Belt when assessed against the 5 criteria.

SITE ANALYSIS

Site photographs

The 9.6-hectare site is located within High Green, in the northern suburbs of Sheffield in South Yorkshire. The site is irregular in shape, slopes downwards from west to east, and its northern boundary fronts onto Springwood Lane.

The site is surrounded by woodland to the south, open space to the southeast and west, and urban development to the north and northeast. Access to the site is currently via Springwood Lane. The Site consists of two grassland fields, the western field comprises modified grassland, which is currently used as a horse paddock. The eastern field comprises neutral grassland. There are scattered semi-mature/mature trees within the fields, and the fields are bound by mature hedgerows and lines of trees.

Low Hall & Low Spring Wood Site of Importance for Nature Conservation (SINC) lies along and immediately beyond the southern boundary of the eastern field, as well as within the extreme south-western corner of the western field, and immediately to the south of this field.

It is mapped as an ancient and semi-natural woodland on the Ancient Woodland (England) Inventory, and as a Lowland Deciduous Woodland on the Priority Habitat (England) Inventory. In addition, there is a small area mapped as Lowland Deciduous Woodland on the Priority Habitat (England) Inventory immediately adjacent to the northern Site boundary.

The wider landscape comprises residential housing to the north and east, associated with High Green. To the west lies a mixture of grassland and arable fields bounded by hedgerows, and to the south lies extensive areas of woodland beyond Low Hall & Low Spring Wood SINC.

The two pages outlined below are visually referencing the site and its immediate context as reference to the existing conditions



Site location aerial from Google Maps



ASSESSING THE SITE

Constraints and opportunities

The adjacent diagrams summarises some of the key opportunities presented by the site, on which the proposals seek to capitalise. It highlights the constraints that will also shape the development: these are represented principally by the site typography and existing trees, and its adjacency to the Ancient Woodland and existing settlement.

There are many characteristics that define Springwood Lane, many of these will have a direct influence on the proposed form of development: some will be incorporated and enhanced as positive attributes, whilst others will serve as constraints that limit the way in which development may occupy areas of the site.

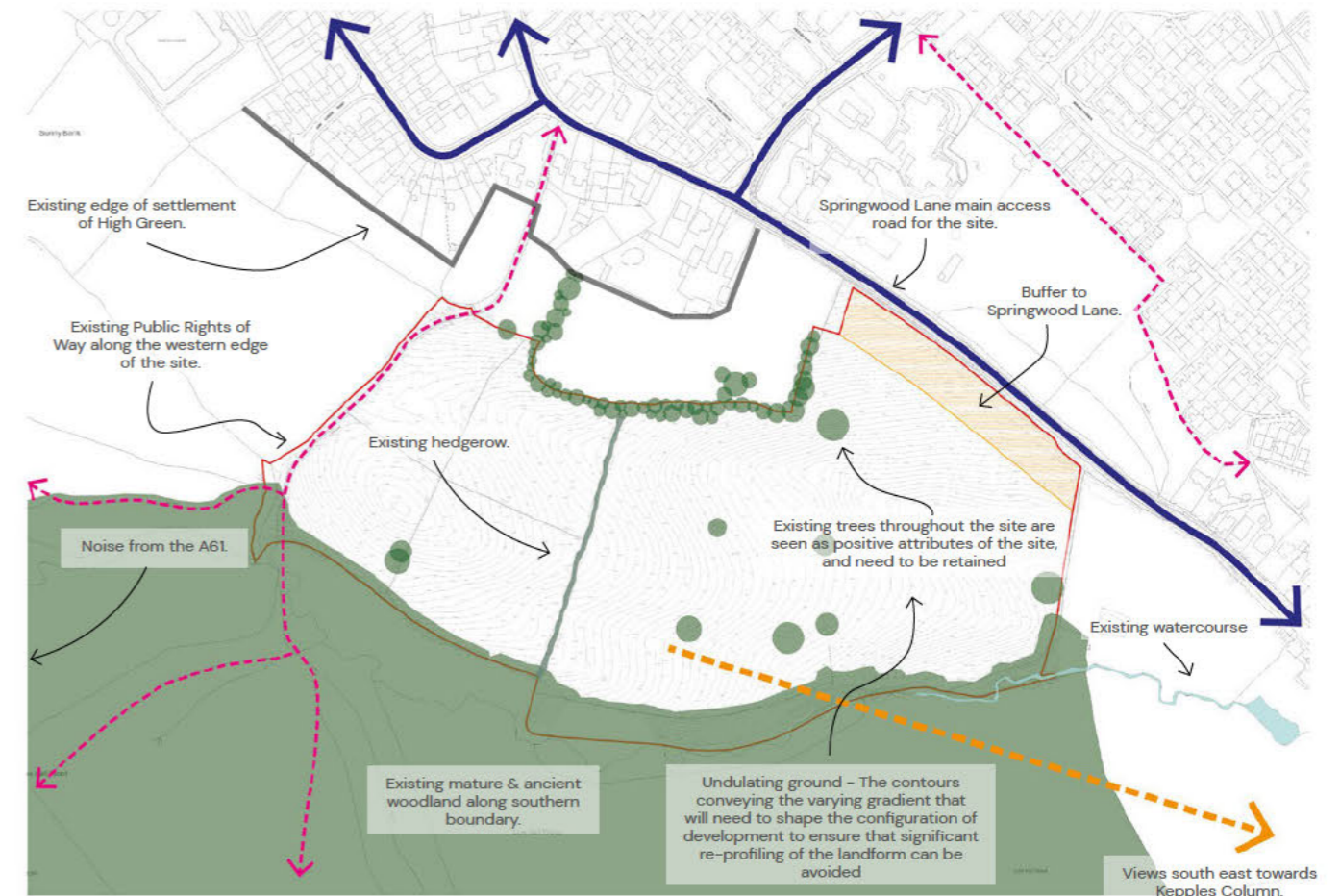
The development will need to respond to the setting of the existing settlements of High Green to the west and north of the site. The existence of the surrounding heritage assets, including views to Keppel's Column, will need to be visually protected from the site.

The site will need to appropriately connect to the existing green links and PRow's along the site boundaries. The proposal also needs to respect the setting of the ancient and mature woodland and provide a substantial offset of at least 15m.

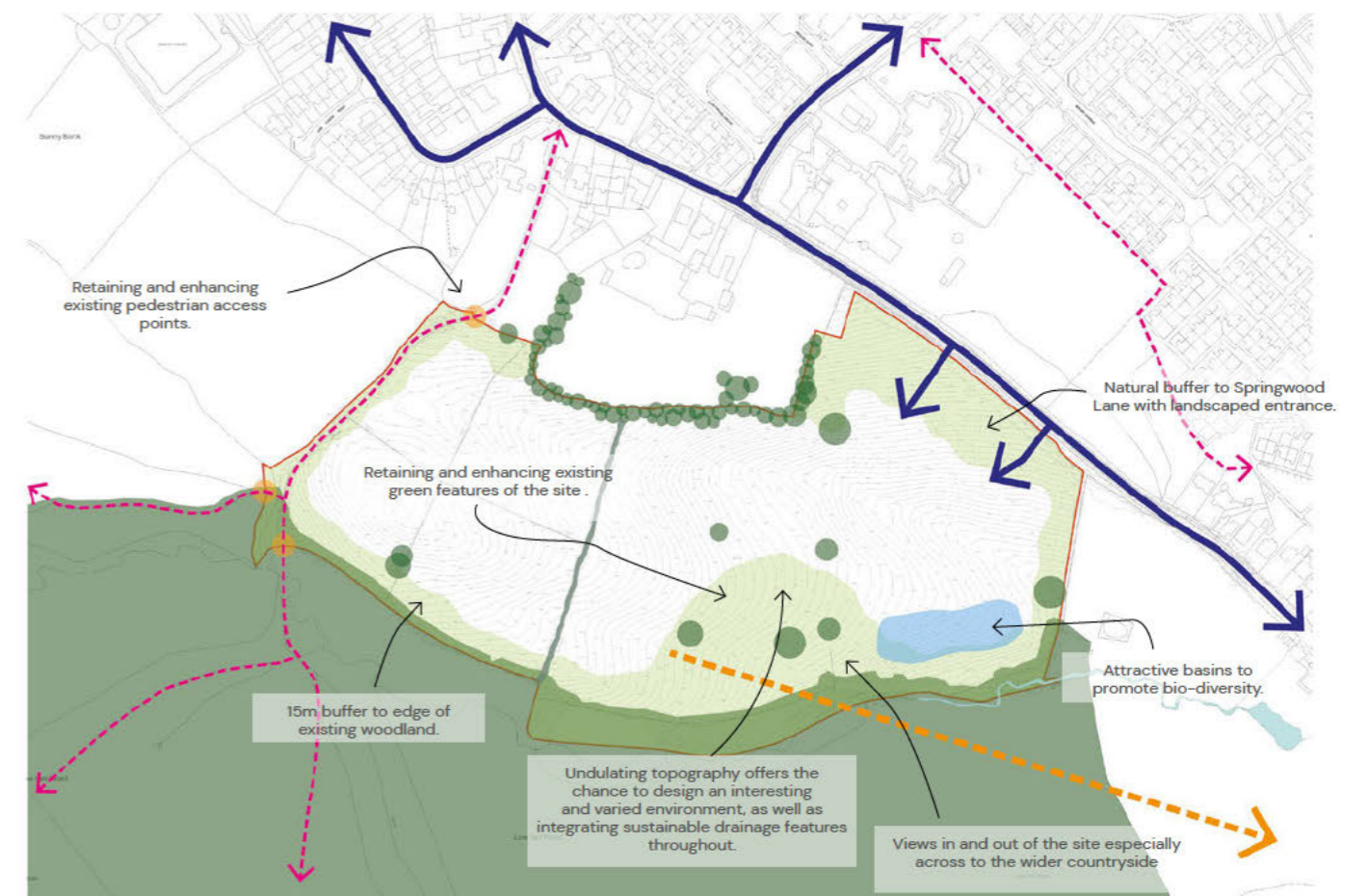
The site presents a number of assets that can be harnessed as opportunities and incorporated into the proposed development. There is an opportunity to protect and enhance the landscape setting of the site by introducing green corridors linking to the existing PRow's and creating a strong green network.

The natural typography of the site offers the chance to design an interesting and varied environment, as well as integrating sustainable drainage features throughout. The sloping nature of the site and its locally raised situation, mean that the higher parts in particular offer attractive views back towards High Green, Chapeltown and over the surrounding countryside. Much of the lower part of the site is screened from view by existing woodland, but higher parts are visually prominent and will require sensitive design solutions to balance these competing factors.

The site includes a number of existing trees, some of which are the subject of TPOs. There are also hedgerows along the existing field boundaries. These natural features should be retained and enhanced where possible.



Constraints diagram



Opportunities diagram

LANDSCAPE

Assessment in context

Landscape

The key characteristics of the site include a landscape of gently rolling rounded hills and valleys with many long, low ridgelines and great variety of landform. There are wide, far-reaching views from the edges and across the site. There is a scattering of trees and hedgerows within the site, these combine with other landscape and landform features to create an intimate, human scale landscape. The site is bounded on its southern edge by Low Hall Wood ancient and semi-natural woodland. Much of this woodland is also designated as a 'Priority Habitat' for deciduous woodland.

Connections

A strong network of footpaths connect the site. To the north, a dense grid of footpaths connect residential streets of High Green. To the west, a footpath runs south through Low Hall Wood, connecting into an expansive network of other footpaths in this woodland. The footpath eventually connects with the Upper Don Trail portion of the Trans Pennine Trail (TPT). Sheffield Country Walk (national trail) also runs through Greno Wood to the south-west of the site, before heading east along Charlton Brook. To the east, a fenced permissive footpath provides a connection between routes within Low Hall Wood and Springwood Lane.

There are also National Cycle Routes nearby which also passes through Greno Wood to the south of the site, before following the same route as the Sheffield Country Walk.

Landscape Designations

The site is currently located within the Green Belt and also lies within an area of High Landscape Value (as designated in Sheffield's City Council Unitary Development Plan (UDP), Proposals Map, Chapel Green, Area 3, 1998). The site also lies within close proximity to a Local Nature Site (Geological), just beyond the site's eastern boundary, as identified in the same UDP.

Two scheduled monuments lie within Greno Wood and Grenoside Woods. The nearest listed building is a grade II listed milepost, which lies at the junction between the B6546 and Penistone Road.

Landscape Fabric

Access is gained from Springwood Lane into the eastern field through a gateway in the north-eastern corner of the site. A second access point is located off a track running south from Springwood Lane which connects with a gateway in the site's north-western corner.

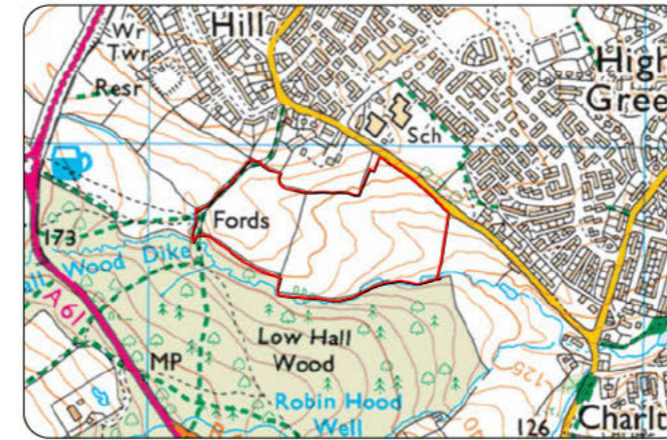
The levels across the site area range from a high point of 165m AOD in the site's north-western corner to a low point of 130m AOD in the site's south-eastern corner, with levels generally falling from west to east, and north to south to wards the valley of Hall Wood Dyke.

Vegetation within the site is sparse, except for the existing mature trees and hedgerows. However, there is strong, mature tree vegetation to the site's northern and southern boundaries, and especially the southern boundary which comprises Low Hall Wood.

Character of the Site

The site area is located in the Upland Character Area and, more specifically, the UP3 Upland Rolling Slopes and Valleys to the West Landscape Character Type. The site area is generally reflective of the Upland Character Area and Upland rolling Slopes Character Type. The site is located on higher ground above the 130m contour, the land is subject to grazing and grassland management, the site is dominated by a woodland edge, restricted views and a good network of footpaths

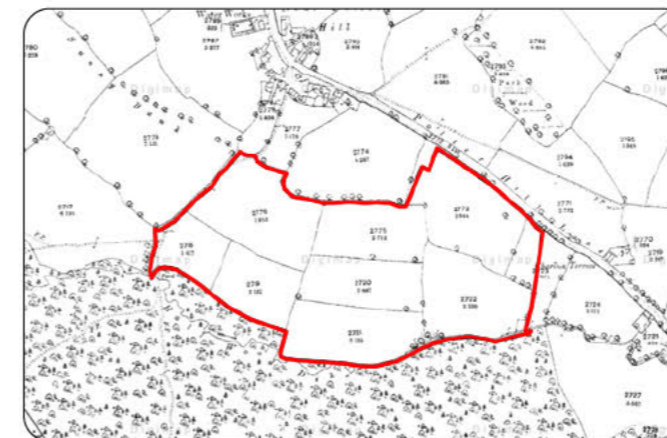
The existing settlement edge does however to a degree influence the site and there are nearby detractors such as the rough, tipped land to the north around the former nursery and the busy A61 and associated uses to the west.



OS mapping showing site context area



Aerial mapping illustrating site area and immediate landscape context



Historic OS mapping (1890's) showing historic field boundaries

LANDSCAPE

Assessment in context

Visual Amenity

Beyond the immediate site context, the site area is relatively contained by either existing built form or significant woodland cover, with a relatively limited visual envelope.

Residential Receptors

Potential residential receptors, in the immediate vicinity with views of the site area are relatively limited.

Properties to the north of the former nursery all back into the site area and are set behind substantial hedgerows and long gardens (see Photograph 2). To the north west properties again back on in this location with further separation provided by an intervening paddock and screening from hedgerows on both sides of the public right of way. To the north east, properties front on to Springwood Lane, with their associated garden vegetation largely, screen views from properties further to the north east. These properties are located to the east of the site boundary providing oblique angled views towards the site area. Further to this, the woodland of Low Hall Wood screens views from residential areas to the south.

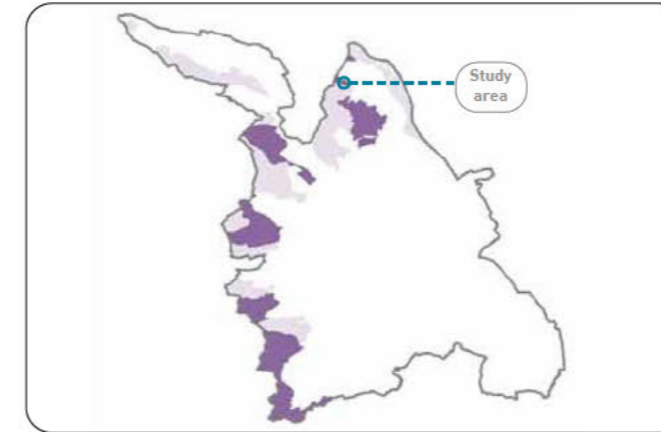
Longer range views from proprieties in the wider landscape are substantially limited by intervening properties, land form or vegetation.

The local footpath network is largely bounded by existing vegetation and screens out views from these routes.

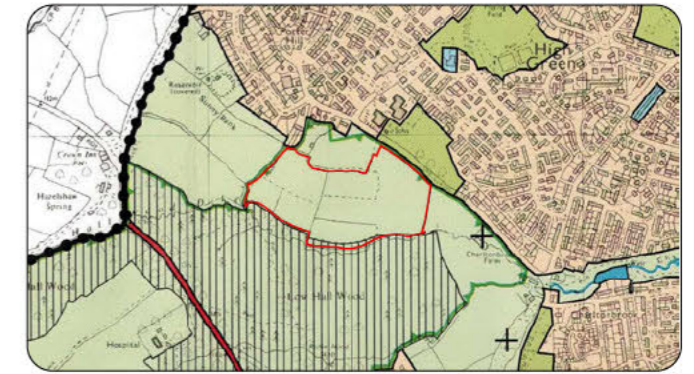
The footpath to the western boundary of the site (see Photograph 3), is lined with hedgerows limiting views across the site area. Once the route enters the woodland views towards the site are lost due to the vegetation and intervening topography.

Within the woodland intervening topography limits views towards the site but views through the trees become more apparent to the east where the site boundary meets the stream (see Photograph 5). A permissive path connects Low Hall Wood with Springwood Lane, this footpath allows close range views over the eastern parcel of the site (see Photograph 4).

To the north eastern edge of the site a footpath runs adjacent to Springwood Lane allowing views over the site area, however these become more limited to the west. The footpath located to the north of the site is screened out by strong vegetation around the school.



Sheffield City Council's Green Belt and Countryside Areas Preliminary Landscape Character Assessment (no date) showing areas of Landscape Character Type UP3 - Upland Rolling Slopes and Valleys to the West



Sheffield UDP Map showing Green Belt and area of high landscape value

Road Users

Potential views from the surrounding road network are very limited and largely comprise of views available from Springwood Lane described above. There are no views available from the B6546 or Peniston Road to the south due to the screening provided by Low Hall Wood. To the west very limited glimpsed views of the eastern portion of the site and wider long views to the east can be gained from the A61 (see Photograph 1).

Other – School

Potential views from the school grounds of Angram Bank Primary School are heavily screened by intervening vegetation both around the school grounds and adjacent to the site on Springwood Lane.



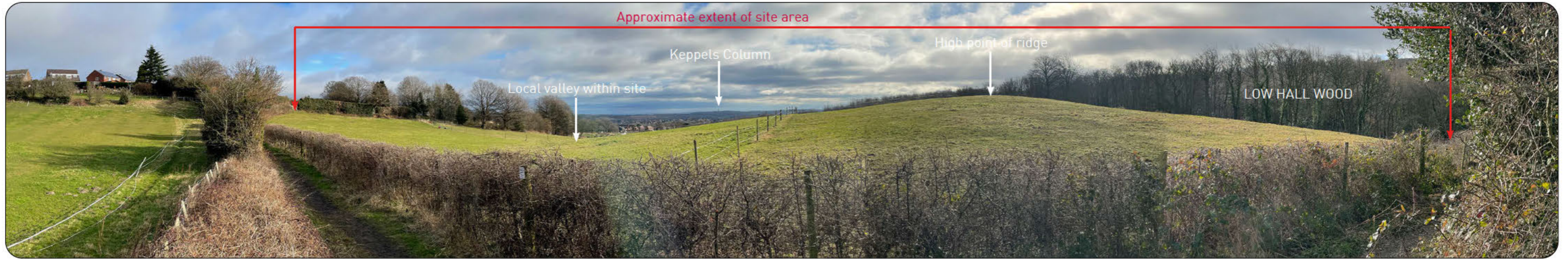
Photograph 1: View from A61 Westwood New Road



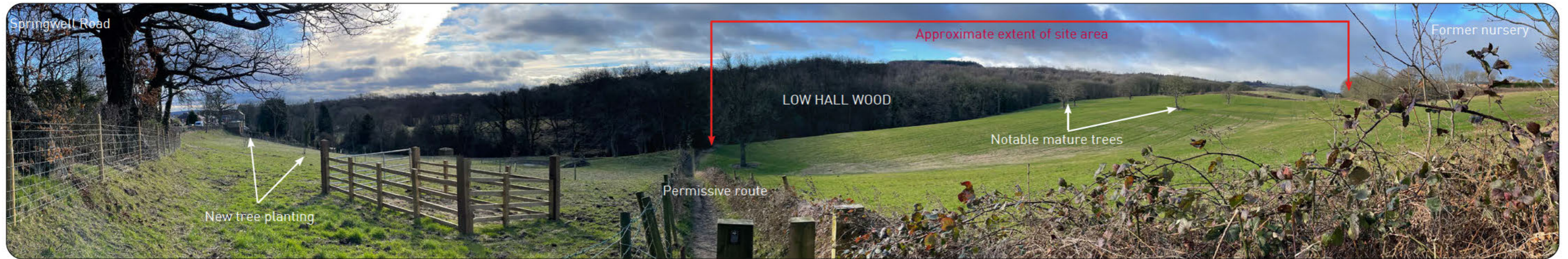
Photograph 2: View from Springwood Road over former nursery

LANDSCAPE

Assessment in context



Photograph 3: View from footpath ECC/12 looking east



Photograph 4: View from permissive footpath from Springwell Road looking south



Photograph 5: View from footpath route within Low Hall Wood looking north

TRANSPORT AND TRAVEL

Assessing the opportunities

An initial high-level Highways and Transport Assessment has been prepared by Met Consultancy Group, please view this document for further details. A summary of the Assessment has been provided as follows.

- » Springwood Lane – has a 5.5m to 6.0m wide 2-lane single carriageway and with a kerbed footway on the southside and a soft verge on the northside. It is also noted that Springwood Lane along the development site boundary has a downhill gradient of c.10% west to east;
- » Greengate Lane/Hollow Gate – has a kerbed 7.3m wide 2 lane single carriageway and with a footway on both sides of Hollow Gate and on the eastside of Greengate Lane;
- » Oak Lodge Road – has a kerbed 7.3m wide 2 lane single carriageway, and with footways on both sides;
- » Hague Lane – has a kerbed 6.5m wide 2 lane carriageway, and with footways on both sides;
- » Thompson Hill – between Oak Lodge Road and Westwood New Road, has a kerbed 5.5m wide 2 lane single carriageway, and with footways on both sides; and
- » Westwood New Road (A61) – in the vicinity of Thompson Hill has a kerbed 15.0m wide single carriageway to accommodate a single lane of traffic in both directions and a right turning lane at the junction. This road has a footway on its eastside.

A review of the Public Rights of Way records indicates a number of footpaths and bridleway in the area. Those in the vicinity of the development site include footpaths ECC/8 and ECC/11A which run to or close to the site's western boundary and footpath ECC/12 which runs along the site's western boundary.

In the vicinity of the development site cyclists predominantly share the roadway with vehicular traffic. However, National Cycle Network Route 67, to the east of the development site, runs part on and part off road, through the northern suburbs of Sheffield and beyond and forms part of the Transpennine Trail.

The nearest bus stops to the development site are located on Potter Hill Lane, Hague Lane to the northwest and Hollow Gate to the southeast. The highway network in the vicinity of the development site has a speed limit of 30mph except along the A61 where 50mph applies. Therefore, a stopping sight distance not less than 43m plus allowance for the gradient (Manual for Streets) is required along this road.

Highways Access

Access to the development site is to be accommodated via Springwood Lane, and an existing public right of way route running along the site's western boundary.

A primary and secondary access on Springwood Lane and in the form of T-junctions are proposed to accommodate vehicular traffic to and from the site. However, it should be noted that new junctions on a 10% gradient are normally not allowed and should be discussed further with the highway's authority.

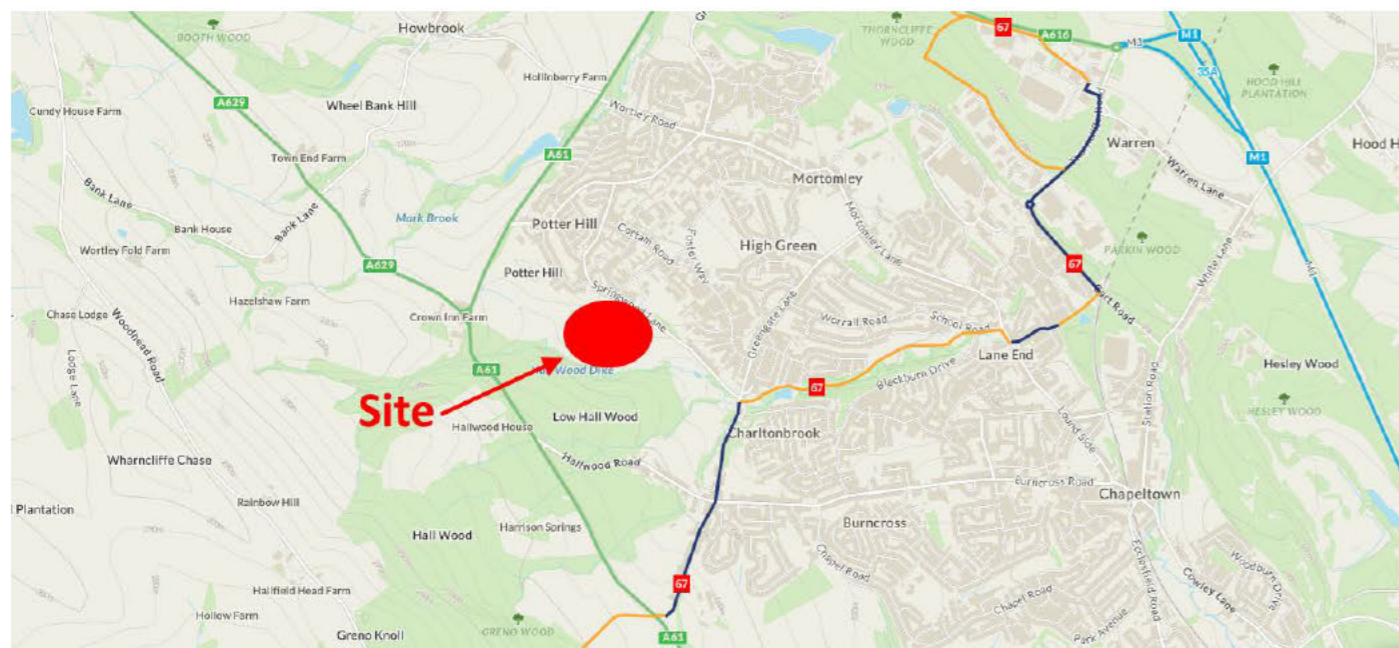
Reducing the speed limit on Springwood Road and providing traffic calming measures may provide some mitigation, or alternatively re-routing Springwood Lane through the site, will reduce the gradient so that access can be accommodated. In the event that access can be accommodated directly via existing Springwood Lane, then these access routes should have 5.5m to 6.25m wide carriageways, and 6.0m to 8.0m entry exit turning radii at the junctions with Springwood Lane. Both entrances should also accommodate pedestrians and cyclists, and therefore include 2.0m wide footways, 3.0m wide shared surfaces

and dropped kerbs with tactile paving at the crossing points.

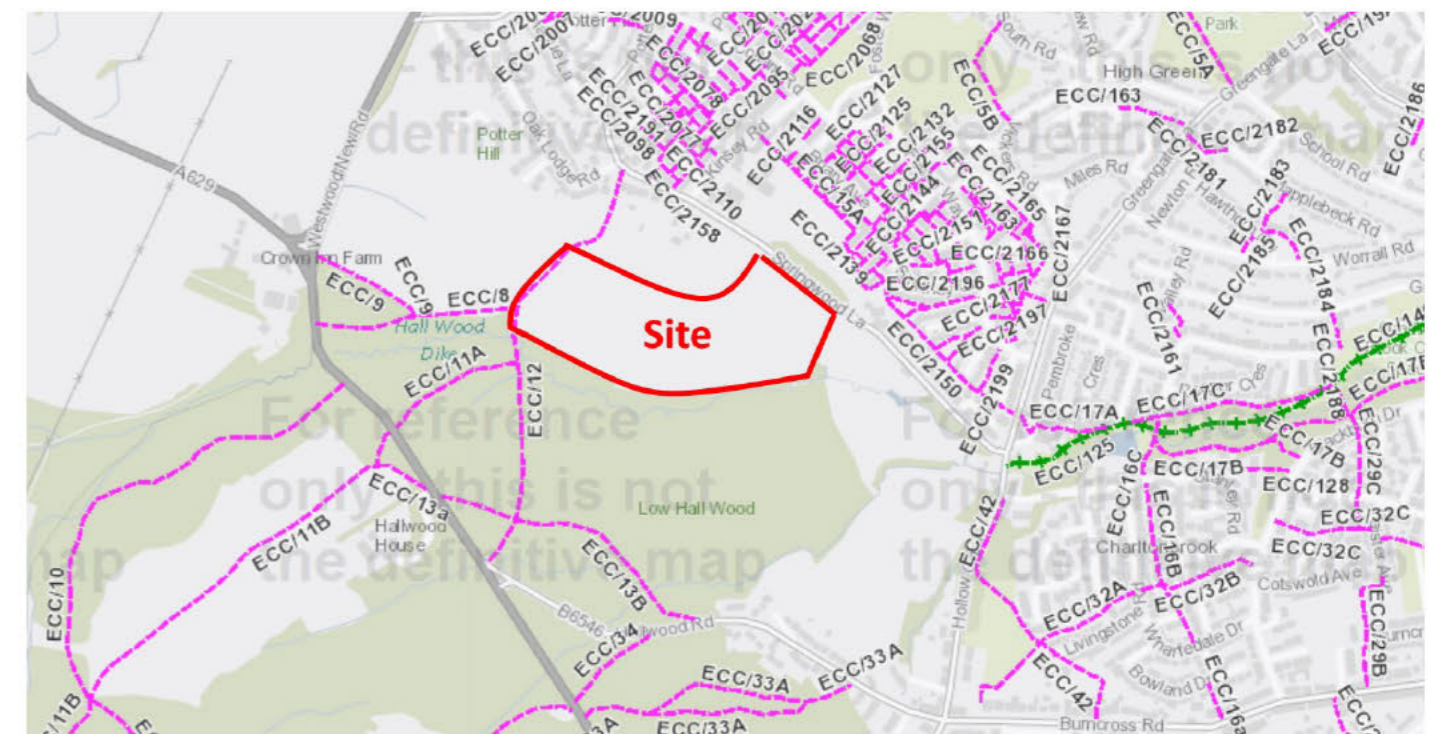
Springwood Lane along the site's road frontage is to be widened to accommodate a 6.25m wide carriageway. To minimise the impact to the existing tree line on the south side of Springwood Lane, the existing footway between the new site entrances is to be relocate to the southside of the tree line, where a new footway/cycleway facility is to be provided

However, a second option is also presented for consideration, where Springwood Lane is widened on both sides of the carriageway, and the footway maintained between the existing tree line and the carriageway.

Given the vehicle speeds recorded along Springwood Lane, and detailed in section 3.0, indicates that stopping sight distances not less than 45m (Manual for Streets), will be required at the two junction locations. However, to compensate for the steep gradient on Springwood Lane the stopping sight distance approaching the junctions from the west should be increased to 60m, and maintained even if the speed limit is reduced on Springwood Lane.



Cycle Route Diagram



Public Right of Way Diagram

TRANSPORT AND TRAVEL

Assessing the opportunities

Non – Car Modes of Transport

The sustainability of a site is inherently linked to its location and access to facilities that encourage active travel and public transport use. This sustainable travel section comprises of an assessment of accessibility to the development site and other key areas in relation to the following categories;

Walking

Planning guidance identifies walking as the most important mode of transport at the local level and offers the greatest potential to replace short car trips in journeys under 2km. Therefore, this places all of High Green and part of Burncross and Chapeltown within an acceptable walking distance from the development site.

The site is located adjacent to an established woodland, and Angram Bank primary school and childcare facilities and has a network of existing footways and rights of way to provide access to surrounding areas. There are a number of amenities and services in the local area to encourage pedestrian trips. At the development site accesses footways are to be provided extending into the site and with dropped kerbs and tactile paving provided at the desire line crossing locations. However, walking along the Springwood Lane corridor given the gradients will be difficult for pedestrians.

Overall, the site has some potential to generate pedestrian trips to and from the surrounding area, and will be promoted further through the Travel Plan and local guidance.

Cycling

Planning guidance identifies that cycling has an important part to play in improving accessibility and reducing pollution. Cycling is generally considered to be a reasonable option for day to day trips up to 5km. Therefore, this places all of High Green, Chapeltown, Burncross and Grenoside and part of Ecclesfield within an acceptable cycling

distance from the development site.

In the vicinity of the development site cyclists predominantly share the roadway with vehicular traffic. However, National Cycle Network Route 67, to the east of the development site, runs part on and part off road, through the northern suburbs of Sheffield and beyond and forms part of the Transpennine Trail.

To facilitate cycle use to and from the development site, secure cycle parking and storage facilities are to be provided on site as part of the development proposal. However, cycling along the Springwood Lane corridor given the gradients will be difficult for pedestrians.

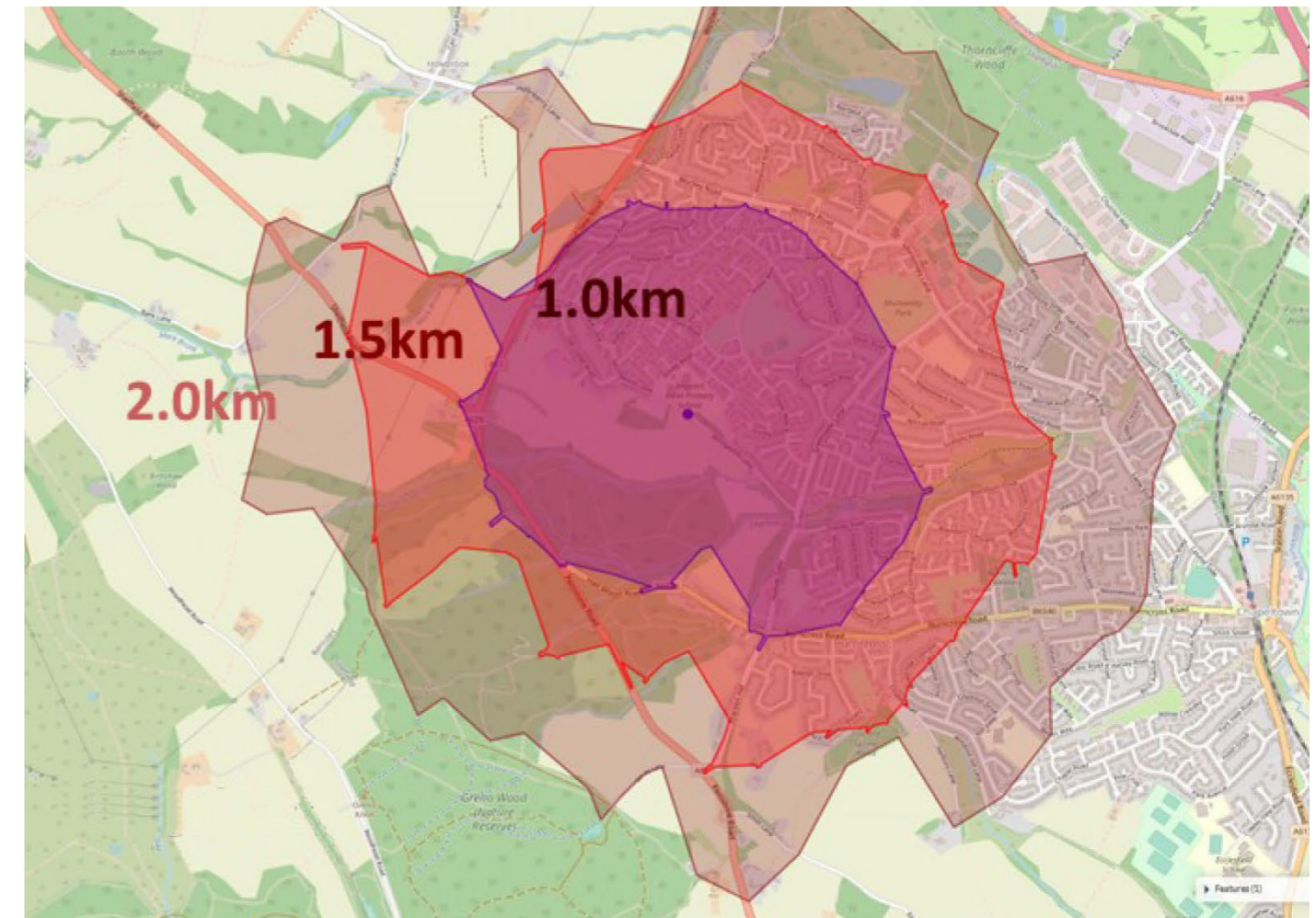
Overall, the development will promote through the Travel Plan and local guidance the use of cycling where possible as a suitable mode of transport.

Public Transport

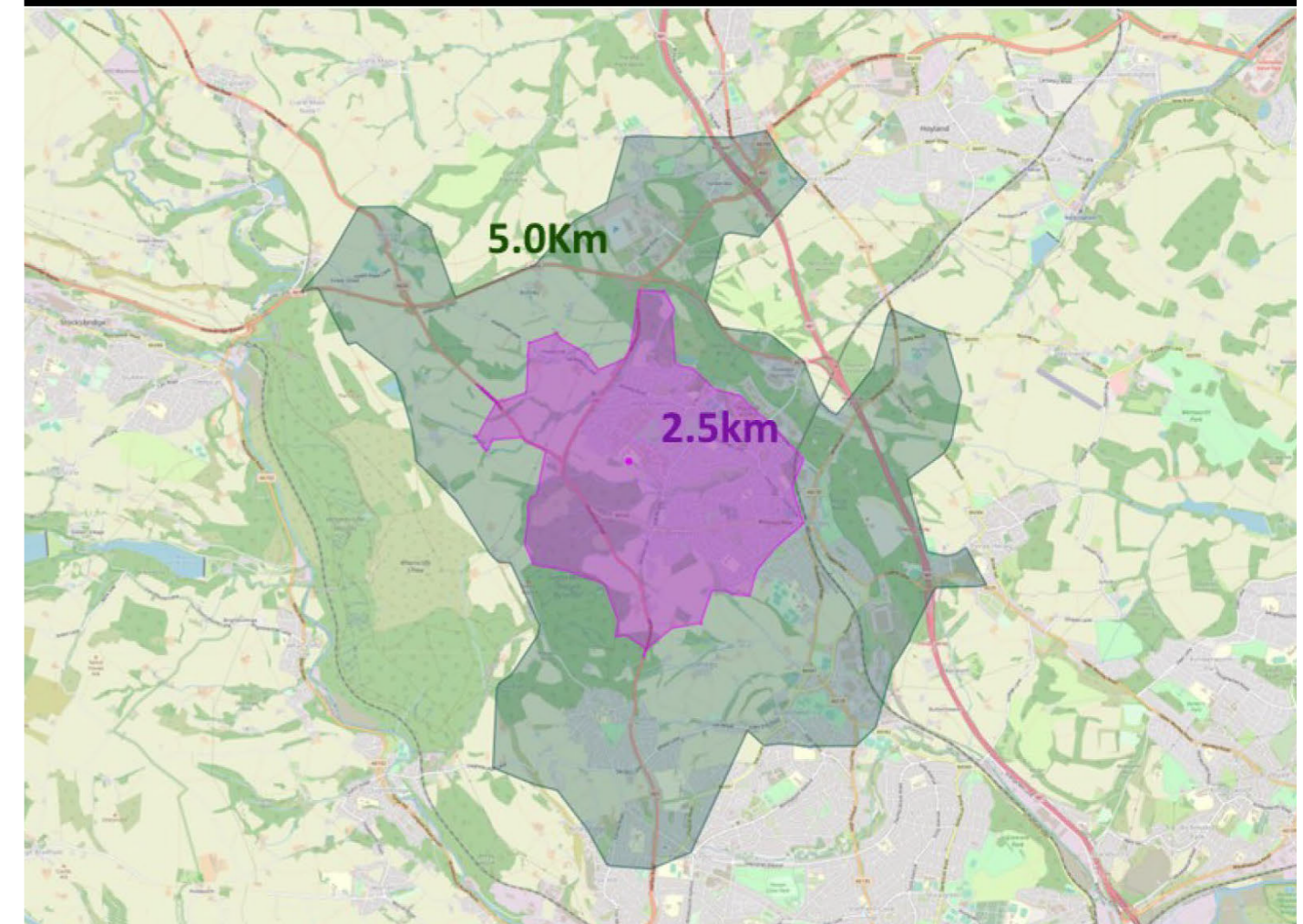
The nearest bus stops to the development site are located on both sides of Hollow Gate, Potter Hill Lane and Hague Lane respectively, and are within 600m walking distance from the centre of the development site. Further stops are located on Foster Way c. 1km walking distance from the centre of the development site. All of these stops are provided with a flag, post and timetable, however the stops on both sides of Foster Way also have recessed bus ways. Those bus services with frequent services to the above stops, are detailed below.

As deduced above, the total number of buses stopping on the local highway network adjacent to the development site, during the working week is 6.33 per hour per direction, which equates to a service frequency of just under 10 minutes. When considering the distances required to travel to these stops, this equates to a low level of accessibility to public transport in the area

Providing stops closer to the development site or within the site would improve access to bus transport. However, this will depend on the final access arrangement for the site and should be discussed further with the highway's authority.



Pedestrian travel distances



Cyclists travel distances

INDICATIVE FRAMEWORK

Design approach

In summary the proposals will include;

- » The green components of the site will combine with the proposed sustainable drainage system, maximising green linkages and enhancing biodiversity whilst reducing site runoff.
- » The creation of a green links allows the opportunity to draw the character of Spring Woods through into the site with the southern most homes fully integrated into the wooded landscape. Green links will provide connections into the extensive network of on-site green spaces as well as linking into the wider area; creating opportunities for recreation and leisure, and the chance to reduce car usage.
- » By preserving and enhancing the significant clusters of trees within the site and along its edges the new neighbourhood will be set within an established landscape framework, giving it characteristics and qualities that are appropriate to its location.
- » The arrangement of buildings and spaces will be carefully structured to ensure that spaces – soft and/or hard landscaped, and opportunities for new neighbours to meet and interact – are clearly defined by building frontages that address them. The residential parcels and the network of roads are designed to work along the contours and not against the contours.
- » A defined and landscaped entrance will celebrate the sense of arrival and a clear route into the development. A tree lined Primary Road with a strong continuous edge allows for positive frontages along streets
- » The layout will create a variety of places and spaces that respond to the unique setting of the site and reflect local character. Routes are arranged in a clear and legible framework of streets, shared surfaces, homezones and spaces.
- » The layout achieves between 184 dwellings @ 36 DPH.



INDICATIVE FRAMEWORK

Design approach / Phasing and delivery

The framework masterplan is a creative response to the opportunities and constraints identified by the site context analysis. It represents a comprehensive framework for the development of the site and provides an overall vision for the new neighbourhood.

The framework masterplan has been strongly shaped by the topography and landscape of the site. Fundamental to the design is the integration of areas of existing and proposed landscape and planting, creating a framework of green routes and spaces around which the built form is organised in identifiable clusters.

An enhanced arrival experience is celebrated through a landscaped entrance green, using the existing trees as key focal points and a network of sustainable urban drainage systems. The arrival built frontage, which is set back from Springwood Lane, forms part of the gateway sequence that offers a bespoke set piece with a strong frontage that maximises views over the open space.

A variety of publicly accessible open spaces is incorporated with a significant new network of recreation and leisure opportunities for the existing and future community. This green infrastructure will also integrate wildlife habitat areas and will contribute significantly to ensuring that the development has no adverse impact on its surroundings through surface water runoff and the provision of SuDS. By preserving and celebrating the trees within the site and respecting the woodland along its edges the new neighbourhood will be set within an established landscape framework, giving it characteristics and qualities that are appropriate to its location.

The layout will create a variety of places and spaces that respond to the unique setting of the site and reflect local character. Protecting and enhancing important elements of the existing landscape is a key aspect of the strategy. Residential parcels are carefully grouped to create landmarks in key locations and frame green vistas. This will form interesting sequences of places, make orientation easy. The car is catered for but does not dominate – the pedestrian and cyclists always come first.

The built frontage will ensure that there is an animated façade to all public frontages. The siting and architectural treatment of individual buildings is directly informed by the specific character of the spaces onto which they face using focal buildings in key locations.

The proposals respect and maintain unique characteristics of the site, while protecting and further enhancing what it is that makes it special. The identity of the place will be strongly defined by the way in which built form and open spaces interact and follow the site's existing and proposed characteristics.

Outlined below is an indicative approach to phasing and delivery. A small 'stand alone' development cell could come forward accessed from Springwood Lane, this would establish the development in order to kick start the wider development. Phasing at this stage is arbitrary and would be developed alongside a developer in due course.



Potential Phasing Strategy

- Phase 1
- Phase 2



SPRINGWOOD LANE

High Green is a major settlement and important town within the suburbs of north Sheffield. Development is and should continue to meet the demands of the growing population through the re-use of previously developed land and on greenfields sites in suitable locations, focusing particularly on the south of High Green.

The proposed site at Springwood Lane provides a logical development site which would assist in ensuring that the district continues to demonstrate a continuing supply of housing land.

In summary the scheme aims to fulfil the following key principles;

PLACEMAKING

Our vision and ethos centres on creating places and communities, not just housebuilding. A remarkable landscape setting offers us an opportunity to create a unique place that future residents can call home.

IDENTITY

Springwood Lane will be a special place with a distinctive character. This will be a place characterised by high quality bespoke homes set within individual landscaped pockets. Each pocket will have their own definable identity landscape and design to create these spaces.

LANDSCAPE

The development at Springwood Lane will respect and complement both the landscape setting and the informal woodland setting of Spring Wood, whilst strengthening the physical connection and visual relationship between both. Creation of new greenways and corridors set within the development and opens pace will provide opportunity for community enjoyment and wildlife connectivity.

COMMUNITY

Springwood Lane will be a place for all, a mixed vibrant community of young and elderly alike, with distinctive places to meet and to learn, engage and experience the surrounding landscape.

RETAIN

Retain the majority of the existing vegetation and boundary trees on the site and integrate these elements with the masterplan proposals.

PROTECT

Protect the visual amenity of adjoining settlements and integrate the development into the existing communities. Develop a special strategy for the entrance green and sustainable drainage system to promote bio and geo diversity credentials.

ENHANCE

Enhance existing boundaries of the site with woodland buffer and specimen tree planting to integrate the proposed development into the surrounding woodland to the east.

MAXIMISE GREENSPACE

Maximize the contribution of greenspace to the proposed development and the wider visual amenity of the site. Maximise opportunities for habitat creation and wildlife preservation.

