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**Subject:** 33129 - High Riggs Farm - Barratt David Wilson Homes Written Representations  
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Dear Sir/Madam,  
Please accept the attached as a submission of written representations to the Draft Sheffield Local Plan for High Riggs Farm, Stannington, on behalf of Barratt and David Wilson Homes.  
Our Client wishes to participate in the hearing session(s) when they occur.  
Please confirm receipt of this email and its attachment.  
Regards,

**Maeve Whelan**  
Graduate Planner



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# Representations to the Sheffield Draft Local Plan (2022)

High Riggs Farm, Stannington  
Prepared on Behalf of Barratt David Wilson Homes

January 2023

## Representations to the Sheffield Draft Local Plan 2022

### High Riggs Farm, Stannington

#### Prepared on Behalf of Barratt David Wilson Homes

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Ref: 33129/A3/MW  
Date: January 2023

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## 1.0 INTRODUCTION

- 1.1 Barton Willmore, now Stantec (BWnS) has been instructed by Barratt David Wilson Homes (herein referred to as "our Client") to make representations to the Publication Draft of the Sheffield Local Plan (herein referred to as "the Local Plan") which is currently subject to public consultation until 20<sup>th</sup> February 2023.
- 1.2 Our Client represents a key stakeholder and is keen to invest in the district and therefore has a keen interest in the plan making process and welcomes the opportunity to respond to the Local Plan Draft consultation. Our Client controls the below parcel of land in Stannington (Figure 1.1) and so is keen to ensure that the Council meets the aspirations for housing and economic growth through the allocation of sufficient and suitable sites through the Local Plan Process.
- 1.3 Included in annex A is the Riggs High Road Vision Document produced by our Client for their site.

**Figure 1.1 Riggs High Road, Stannington**



- 1.4 The NPPF states that in order for a Local Plan to be Considered 'sound' it must be:

**a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs 21 ; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is**

**accommodated where it is practical to do so and is consistent with achieving sustainable development;**

**(b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;**

**(c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and**

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

1.5 This report sets out our Clients representations to the Local Plan update, outlining where our Client believes the Plan does not meet the above criteria and is considered to be unsound.

1.6 The remainder of these representations are therefore structures as follows:

- Section 2: Draft Local Plan Part 1 – Housing Requirement and Distribution
- Section 3: Draft Local Plan Part 2 – Development Management Policies and Implementation
- Section 4: Summary
- Annex A: Riggs High Road, Stannington – Vision Document

## **2.0 DRAFT LOCAL PLAN PART 1 - HOUSING REQUIREMENT AND DISTRIBUTION**

- 2.1 The Part 1: Vision, Spatial Strategy, Sub-Area Policies and Site Allocations document sets out the vision, overall aims and objectives of the Council. It sets out the scale of proposed growth within the region to 2039 and allocations to deliver this growth.
- 2.1 Our Client has a number of concerns regarding the soundness of the Council's strategy and deliverability of the Plan, principally in regard to the total housing target, and the allocations on which the housing target is to be met.

### **Policy SP1: Overall Growth Plan**

- 2.2 Paragraph 61 of the Framework notes that 'To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.'
- 2.3 The PPG notes that the Standard Method is not mandatory if circumstances warrant a different approach, however this is noted as being expected to be more closely scrutinised at examination and 'the expectation is that the standard method will be used, and that any other method will only be used in exceptional circumstances.'
- 2.4 Despite these clear indications for the use of the standard method, Policy SP1 establishes the Council's plan for growth, including the need to deliver only 35,530 homes by 2039 (**2,090 homes per annum from 2022 to 2039**). This is a significant shortfall from the standard method and will be met through 297 housing allocations and 19 mixed use developments, primarily within the 'Central Sub-Area' and within 'Broad Locations for Growth'.
- 2.5 The Council appointed IcenI to produce a Housing, Economic Growth and Demographic Modelling report in July 2021 in order to justify the significant reduction from the level of homes required. That report demonstrates at paragraph 2.18 that the time of writing the level of homes required to meet the standard method was 49,691 homes.
- 2.6 This has been superseded by the Council's 5-Year Housing Land Supply Monitoring Report published in December 2022, which updates the position. This report acknowledges that the minimum number of homes needed in each local authority area must be calculated using the Government's Standard Method (SM). In December 2020 the 35% uplift was introduced for the 20 largest towns in cities in England. Therefore, Sheffield's base

figure is uplifted from **2,236 (38,012 total over plan period) to 3,018** homes per annum.

2.7 If this figure is applied to the 17 years of the plan period (2022-2039), it equates to **51,306** dwellings over the plan period (3,018 x 17). This results therefore, in a short falling of **15,776** dwellings (51,306 - 35,530) from the SM figure.

2.8 The committee report from the 3<sup>rd</sup> November Extraordinary meeting of the Transport, Regeneration and Climate Policy Committee stated that the Cooperative Executive were mindful that the SM provides a 'starting point' for housing requirement, and that other factors (such as the Green Belt) need to be considered when setting a housing target, despite the 2022 5-Year Housing Land Supply Monitoring Report acknowledging that the SM figure should be used as a minimum figure.

2.9 Paragraph 6.5 of that report notes,

*Several important factors have determined the growth plan and overall spatial strategy proposed in the Draft Sheffield Plan:*

*a) Under the National Planning Policy Framework (NPPF), strategic policies in the local plan do not have to meet the objectively assessed needs for housing and other uses if expansion of the urban areas is constrained by Green Belt. The Green Belt Review shows that almost all the land designated as Green Belt continues to perform at least one of the purposes of Green Belt.*

*b) Releasing greenfield land in the Green Belt for development now has a high risk of undermining efforts to reuse the substantial supply of brownfield sites in the City Centre and other parts of the urban area. It would also cause significant harm to the city's biodiversity and would undermine the city's reputation as the 'Outdoor City'. The adverse impacts of meeting the full need therefore significantly and demonstrably outweigh the benefits of meeting the need for housing and other development when all Page 50 Page 41 of 49 factors are considered.*

*d) Demographic analysis by Icen Projects (see paragraph 1.6.5- 1.6.7 above) shows that the city's economic growth plans require an annual housing requirement within the range 1,994-2,323 homes per year and that this can be achieved by developing land within the existing urban areas. No harm would therefore be caused by setting the housing requirement at the level (2,100 homes per year) proposed in the Draft Plan.*



***g) Adopted local plans elsewhere in South Yorkshire and Derbyshire currently provide 'headroom' in terms of meeting the Government's annual housing need figure across the wider city region.***

- 2.10 The PPG is clear that any alternative approach must be exceptional. The Council's reasons for using a significantly lower figure are generally based on large parts of the district being Green Belt, a potential adverse impact on biodiversity and the Council's reputation as a green city, alternative economic assessment and other neighbouring authorities meeting Sheffield's needs by over delivering in their plan.
- 2.11 Our Client does not consider that these reasons are exceptional and as such the justification exists in order to significantly reduce the level of homes.
- 2.12 Taking each of these in turn, Sheffield, amongst a number of other northern cities is surrounded by the Green Belt. However, this in itself is not exceptional, nor should it restrict the level of homes being developed. In recent years Leeds, York, Bradford, Calderdale, Kirklees, Wakefield, Barnsley and Rotherham have all adopted plans with the need to amend Green Belt boundaries to meet their housing needs.
- 2.13 None of these authorities noted that the Green Belt was sufficient justification in isolation to not meet their housing needs. Indeed, all of these authorities noted the need for homes and that in order to meet their needs exceptional circumstances exist to release land from the Green Belt. Based on any reduction in homes, jobs and the associated impact on local services together with the sustainability impacts locating all new homes in existing built-up areas would have ultimately determining that not meeting their needs would have an adverse impact on the plan as a whole.
- 2.14 Such an approach as that advocated by the Council invariably results in the loss of open spaces, a reduction in affordable housing provision and impacts on mix with high density schemes being predominantly one and two bedroom apartments. None of these points appear to have been considered in any of the evidence put forward by the Council in seeking to reduce the level of homes and the impact this would have. This is particularly notable in the Sustainability Appraisal, which is considered unsound.
- 2.15 With regards the impact on biodiversity and the 'outdoor city', there is no evidence on how meeting the minimum housing need would impact either of these, nor how Sheffield is different to any other city in these regards. The 'outdoor city' status is not evidenced and is not subject to any planning policies, similarly there are no specific wildlife habitats or designations unique to Sheffield or in significant quantity that the housing need could affect it adversely.

- 2.16 With regards to the ability to meet their economic needs with a lower level of housing, it is noted that Sheffield’s population is aging and the need for working age population will need more homes. The report is predicated on increasing the workforce from the existing population and equally indicates a range, of which the Council have chosen the lowest possible figure.
- 2.17 Whilst we consider there are issues with the IcenI approach, the SM is not based purely on meeting job needs. The SM considers demographic change, affordability and meeting economic needs. The Council have solely focussed on economic needs in the IcenI report and consider the job growth can be met with lower levels of housing. This is therefore not considered to be an exceptional circumstance to fail to meet the city’s needs as it does not consider the needs of all, housing mix, house types, affordable need and the impact on these of reducing the level of homes.
- 2.18 Finally, the report references the ability to reduce the level of homes in Sheffield as there is sufficient headroom from neighbouring authorities who have over-delivered. The PPG is abundantly clear that the 35% uplift is to be met within the 20 most populated cities and not passed to neighbouring authorities. This reference demonstrates that Sheffield is effectively retrospectively moving their uplift to other authorities in direct conflict with the guidance.
- 2.19 Given the Council’s reasons there are no exceptional circumstances to not meet their needs. The reasons given apply to almost any Green Belt authority and if found sound and replicated elsewhere, would result in a significant shortfall regionally, and nationally.
- 2.20 The table below demonstrates the possible combined shortfall in dwellings from the reduced SM and uncertain ‘Broad Locations for Growth’ referenced later in these representations.

**Table 2.1 Possible short fall in dwellings**

Consultation Draft Plan target	Consultation Draft plan Target minus Broad Locations for Growth	SM (no uplift)	SM (with 35% uplift)	SM (no uplift) vs Draft Plan Target	SM (no uplift) vs Draft Plan (minus Broad Locations for Growth)	SM (with Uplift) vs Draft Plan (with Broad Locations for Growth)	SM (with uplift) vs Draft Plan (minus Broad Locations for Growth)
35,530	30,855	38,012	51,306	= 2,482	38,012 – 35,530 = 2,482	51,306 – 35,530 = 15,776	51,306 – 30,855 = 20,451

- 2.21 Each combination results in significant under supply of homes ranging from 2, 482 homes to 20,451 homes. Simply applying the governments methodology results in a shortfall of 15,776 homes, almost 1000 per year. The negative impacts that this then has on mix and affordable housing is clearly not outweighed by the Council's reasoning.
- 2.22 Our Client therefore, believes that the housing target needs to be reviewed. As a result, sustainably located Green Belt sites which could significantly contribute to the housing target should be reassessed and will need to be included in the plan.
- 2.23 Our Client strongly objects to this significant reduction in housing provision and argues that by so severely limiting the target figure, the plan is unsound. In its current form, the Plan is not positively prepared as it does not meet the SM figure. It is unjustified as it does not consider options for Green Belt release and is not effective as the allocations chosen are extremely tightly constrained and likely undeliverable in some places.

#### **Policy SP2: Spatial Strategy**

- 2.24 Policy SP2 states that the majority of future growth will be on previously developed land in the Main urban Area and the two principal towns of Stocksbridge/Deepcar, and Chapeltown/High Green. Policy H1 expands on this to set a target of 85% of all new homes to be delivered on previously developed land. This target is unique, has not been met in any other areas, and historic delivery demonstrates it as unachievable. To establish a settlement hierarchy, distribution and site allocations on this premise significantly undermines the deliverability of the plan and the soundness.
- 2.25 It is clear from the resolutions and debate in various Council meetings and Committees, that the Council's primary driving factor in progressing the plan is to avoid the need for development in the Green Belt and where possible greenfield sites. As a consequence, the plan has been drafted in a way to meet this primary aim, to the detriment of the delivery of homes and meeting the needs of the residents of Sheffield. The reduction in the overall level of homes is explicitly in order to meet this policy requirement.
- 2.26 Our Client objects to this policy and the overarching aim in the plan that is established and thereafter used to assess the distribution and selection of housing allocations. The primary basis for this is that it is considered the plan will not be effective and not positively planned, therefore unsound.
- 2.27 There are currently no policy restrictions on any of these sites being brought forwards. Previously developed sites within the city are supported in both the Council's current plan and also National Planning policy. The adoption of a new plan and allocation of

these sites does not unlock these sites, it does not provide a new policy basis for their delivery, and it offers further restrictions than in the current plan in terms of standards, affordable housing requirements, space standards and environmental guidance.

- 2.28 Whilst our client has no in principle issues with the increase in standards, if these sites have not previously been brought forward, increasing the impact on climate change (Policy EC1) adding costs, NDSS etc are likely to add further deliverability issues.
- 2.29 Sheffield's housing delivery has consistently been below the required levels established in both the 5-year land supply and the housing delivery test. Currently the Council's own evidence demonstrates only a 3.63-year land supply.
- 2.30 A significant contributor to this has been the lack of an up-to-date plan, the lack of deliverable allocations and a reliance on windfall housing. The Council's plan effectively seeks to allocate the sites that have failed to deliver as windfall homes over recent years. It is clear that Sheffield needs an up to date plan, however the importance of this is to meet housing needs, which has not been done for some time, to provide an appropriate level of affordable homes, which has not been done for some time and to meet the needs of families and younger people.
- 2.31 The city needs a step change in housing delivery and the only way to do that is through the adoption of an up-to-date plan providing a clear change in policy approach and the release of deliverable sites to deliver the type of homes that are needed in sustainable locations in the whole city. Unfortunately, the Council's approach has resulted in a significant reduction of the level of homes it plans to deliver and also a continuation of existing policies that have failed.
- 2.32 The adverse impacts of the Councils approach can be seen in the distribution of housing within the Local Plan area. As can be seen in the table below, the Central Sub-Area is to deliver a disproportionately high number of dwellings with 65% of new homes being delivered in the central area, whilst other areas such as the Southwest only receive 3% of all homes (80 allocated sites without permission), Stocksbridge/Deepear 4% of all homes (273 allocated sites without permission), and Chapeltown/High Green (0 allocated sites without permission) are to deliver significantly fewer homes.

**Table 2.2 Potential Housing Distribution**

Sub-Area	Potential Number of Homes 2022-2039			
	Large sites with Planning Permission* (not Allocated)	Allocated Sites with Planning Permission*	Allocated Sites without Planning Permission	TOTAL
Central	280	7,865	10,320	<b>18,465</b>
Northwest	20	670	325	<b>1,015</b>
Northeast	180	300	485	<b>965</b>
East	45	1,175	1,720	<b>2,940</b>
Southeast	35	380	1,225	<b>1,640</b>
South	0	330	420	<b>750</b>
Southwest	55	620	80	<b>755</b>
Stocksbridge/ Deepcar	15	640	273	<b>928</b>
Chapelton/ High Green	0	25	0	<b>25</b>
<b>Total</b>	<b>630</b>	<b>12,005</b>	<b>14,848</b>	<b>27,483</b>

- 2.33 The Northwest Sub-Area where our client controls land (see figure 1.1 and Annex A) is only set to deliver 1,015, approximately just 3% of the total housing target.
- 2.34 By choosing to focus the delivery of housing to the Central Sub-Area, the Council have overlooked the constraints on many of these sites in favour of developing previously developed land over greenfield and Green Belt land. While our Client acknowledges the importance of the redevelopment of brownfield sites, it is their view that focusing such a high proportion of homes in one area is undeliverable and unsustainable and therefore object to this policy.
- 2.35 Many of the sites do not lend themselves to such high levels of housing and it is our Clients key concern that focusing delivery in these areas will severely limit the mix and type of housing possible which will inevitably exclude some groups. Therefore, our Client objects to this Policy and believes it makes the Plan unsound.
- 2.36 Table 2 included in the plan and replicated above also shows the historic low delivery in the outer areas including the Northwest Sub-Area. This Sub-Area only has 670 homes that are allocated with planning permission, showing a lower historic level of applications, approvals and delivery. Given none of the sites allocated require the plan to deliver the homes, the historic low levels of delivery in these areas does not provide justification to allocate the sites chosen.

- 2.37 Whilst this is not unusual in most plans, given Sheffield are only allocating sites that currently benefit from policy support, the lack of historic delivery is concerning and demonstrates a need for a change in approach in this area.

**Policy SA1: Central Sub-Area**

- 2.38 Central Sub-Area will be the focus of residential development delivering approximately 18,640 new homes through existing planning permissions and new allocations.
- 2.39 Our Client objects to this disproportionately high housing figure for this Sub-Area. This figure makes up approximately 67% of the total figure included in table 2.2.
- 2.40 As these representations go on to detail, our Client has key concerns over the delivery of this high target on the existing small sites in this Sub-Area, and the housing mix and type this scale of development in the city centre will entail. Significantly, Policies NC3 Provision of Affordable Housing, Policy NC5 Creating Mixed Communities, Policy NC8 Housing Space Standards, and Policy NC9 Housing Density significantly further limit the space and scope of possible development. Therefore, our Client objects to this Policy on the grounds that a too heavy focus of development in this region will limit the scale, quality and mix of housing development.

**Policy SA2 - Northwest Sub-Area**

- 2.41 Our Client objects to the level of Homes in North west Sheffield. This sub-area, includes part of the main urban area, large settlements, district centres and smaller villages. All of these existing areas have services and businesses that require growth to maintain viability, however the plan only aims to deliver 1,015 homes in the plan period, sixty per annum. For such a large part of the city, with a significant population, number of settlements and existing services, this level of development is significantly less than what is necessary.
- 2.42 The homes in this area are planned to be delivered through a series of housing allocations. Our Client objects to the sites chosen as these all rely on significantly high density development. The sites shown in Appendix 1 show a total of 1,275 homes to be delivered across 26.6 hectares of land at approximately 50 dwellings per hectare. Such high-density development is unlikely to deliver the Councils aspirations on housing type and mix.
- 2.43 It should be noted that 480 homes are delivered across two sites, NWS09 and NWS10 at a density of 67 dwellings per hectare. Removing these from the list results in all other sites being developed at a density of 40 dwellings per hectare, however many of these are significantly higher, including NWS11, 21 and 22 all broadly 150 dph. It is clear a

broad range of homes are required, and in order to achieve this increased and/or alternative housing allocations are required.

### **Policy H1: Scale and Supply of New Housing**

- 2.44 Policy H1 sets the approach to delivering the level of homes and distribution defined in Policies SP1 and SP2 and therefore reiterates those provisions in Policy SP1 and SP2. Policy H1 however goes further than referencing that the majority of homes are built on previously developed land and sets out a target of delivering 85% of all homes to be delivered on previously developed land.
- 2.45 The 85% target has no evidential basis to demonstrate deliverability and is therefore unsound. Anecdotally, no other Local Plan area in the region has managed to deliver anywhere near this level of homes on previously developed land or even aspire to in their plans on the basis that it is clearly not deliverable or sustainable. This includes similar geographic and demographic areas, such as Leeds, Bradford and York, who have all required on significant delivery on greenfield and Green Belt sites.
- 2.46 Policy H1 also provides the framework for how the Council will deliver the level of houses it plans for, including through sites that already have planning permissions, on identified housing allocation sites and in Broad Locations for Growth.
- 2.47 In regard to 'Broad Locations for Growth' the Plan states:
- "The Council's analysis suggests that together, developable sites in the Broad Locations for Growth and windfalls on larger sites in other areas, could provide around 4,675 additional homes. This is over and above the Site Allocations and windfalls on small sites. Much of the additional developable supply is likely to be delivered after 2029 (years 6-15 of the Plan period)."**
- 2.48 Table 1 Housing Land Supply 2022 - 2039 sets out how these different categories of housing will contribute to the overall target, with 630 homes already with planning permission, 26,853 on allocated sites, 3,400 homes on windfall sites and 4,675 homes on the broad locations for growth.
- 2.49 One in seven of the homes developed in the plan period are envisaged in the Broad Locations for growth, noted in the plan as areas that **'are already transitioning or have the potential to transition from employment uses to housing.'** Further noting that **'There is not yet sufficient certainty to allocate all the land that is potentially suitable for housing in these areas. Further work is needed to assemble sites, relocate existing uses, and plan for new infrastructure.'**

- 2.50 It is clear that these Broad Locations are currently in use, have not been promoted by the existing landowners, require relocation (if the landowners are even willing) and significant infrastructure. There is no certainty that these sites are even available, let alone developable and as such they should not be included in the land supply.
- 2.51 Our Client strongly objects to the use of these locations for contributing to the housing target. There is no guarantee that these sites can successfully come forward. Indeed, the Plan states that many of these sites have multiple owners, and that public intervention will be needed to ensure these sites can be successfully transitioned from employment to residential land.
- 2.52 The capability of these sites delivering the potential 4,675 dwellings is uncertain and therefore, should not be included in the total housing target. As a result, the 4,675 should be reallocated to alternative deliverable sites in order to secure housing delivery within the Plan period.
- 2.53 Moreover, the release of Green Belt sites in the Sub-Areas which intend to utilise Broad Locations for Growth, should be considered.
- 2.54 Policy H1 also includes a provision for 3,400 windfall sites later in the plan. Windfall should only be included if it can be proven as deliverable. The Council have relied upon windfall due to the lack of an up to date plan, hence recent figures being high, however many of the potential windfall sites are now allocated, significantly reducing the ability for windfall to come forward in the future.
- 2.55 This is acknowledged in the plan as the Council do not plan for any windfall in years 1-5 of the plan. Given the Council are using up the majority of sites, previously considered windfall and do not include any in the early stages due to the lack of sites, it is unreasonable to then include windfall in the latter years. Given the constraints and significant reliance on broad locations, which are also unallocated sites, a provision for 3400 homes from windfall is not positively planned or justified and therefore unsound.

### **D1: Design Principles and Priorities**

- 2.56 This Policy states that:
- “Development should be sustainable, beautiful, functional, of high-quality, and should respect, take advantage of, and enhance the characteristic features of the city, its settlements, districts, and neighbourhoods”**
- 2.57 Whilst Our Client supports the need for high quality development, policies should reflect national planning policy and also be clear in their requirements. They therefore object



to this Policy as worded as it does not provide clarity and the ability to comply with its requirements are solely subjective with no clear guidance. Terms such as 'beautiful' and 'high-quality' design mean different things to different decision makers and result in difficulties to positively prepare applications. The policy therefore requires amendment in order to make it sound.

### **3.0 PART 2 OF PLAN – DEVELOPMENT MANAGEMENT POLICIES AND IMPLEMENTATION**

- 3.1 A Number of the policies in part 2 of the plan contribute to our Client’s concerns over the deliverability of the allocated sites and the need for more homes to be allocated. The Council’s sites are broadly city centre and urban area sites, developed at a high density of predominantly smaller properties at the lowest level of affordable housing.
- 3.2 This approach therefore conflicts with the policies in Part 2 on density, housing mix, the need to provide on site open space, NDSS compliance and the need for larger properties. These are outlined below as it is not considered possible to comply with the Part 2 policies on the allocations and no evidence is provided from the Council that those policy requirements have been included when setting the capacity of each site.
- 3.3 For example, if open space is provided on all sites and only fifty percent of the properties are one bedroom properties together with meeting NDSS, this could significantly reduce the level of homes that can be delivered on certain sites. Without evidence the capacities are deliverable with these policy requirements the plan is unsound.

#### **Policy NC3: Provision of Affordable Housing**

- 3.4 Under this policy it is stated that on sites for 10 or more dwellings a minimum 10% contribution of affordable housing is expected. This figure rises to 30% in just the Northwest, South and Southwest affordable housing market areas.
- 3.5 The Council’s most viable areas receive some of the lowest levels of housing, showing the need for more homes in those areas. Given the majority of homes are in the 10% area it is highly unlikely the needs will be met and as such a further uplift should be included in the housing requirement.

#### **Policy NC5: Creating Mixed Communities**

- 3.6 Policy NC5 states that for developments of 30 or more homes in the city centre, no more than half the homes should consist of one-bedroom apartments and studios and requires a greater mix of house types on development of 30 or more homes outside the city centre.
- 3.7 The plan relies on a number of large high-density sites, with no evidence on the mix or the ability to deliver those numbers with the restriction of one-bedroom apartments. Further evidence needs to be shown that this is deliverable, and the level of homes can be delivered in the plan when applying all policies in the plan.

#### **Policy NC8: Housing Space Standards**

- 3.8 This Policy states the new housing development should comply with national space standards, should demonstrate adequate living space is provided, be flexible and adaptable to the changing needs of occupants, provide appropriate outdoor private amenity or garden space, and not result in loss of existing garden space.
- 3.9 Our Client acknowledges raises concerns whether this has been factored into the deliverability of the allocations. The allocated sites are being developed at very high density and applying NDSS may restrict their ability to meet the level of homes needed.
- 3.10 The Policy should also consider the likely demand for home working spaces and the delivery of first floor uses that are not bedrooms. At present any upper floor room would have to meet bedroom sizes, whereas a small home office may be appropriate. On this basis flexibility should be added into the policy.

**Policy NC9: Housing Density**

- 3.11 Under this Policy, density ranges are set out for the following areas; within or near to the Central Area (at least 70 dwellings per hectare); within or near to District Centres (50 to 80 dwellings per hectare); within easy walking distance of tram stops and high frequency bus routes (40 to 70 dwellings per hectare); an remaining parts of the urban area (35-50 dwellings per hectare).
- 3.12 These densities are significantly higher than neighbouring authorities and are not considered to reflect the characteristics of areas, rather they are designed to increase the density of schemes and reduce the overall number of sites to be allocated. Policy NC5 seeks to provide a mix of type and size of homes and to provide homes for large households. Policy NC5 and 9 are therefore in direct conflict as it would not be possible to deliver these aspirations on sites with a density of over fifty dwellings.

**Policy NC15: Creating Open Space in Residential Developments**

- 3.13 This policy states that for developments with a capacity less than 100 dwellings, provision of open space off-site will usually be acceptable but greenspace and landscaped areas should be provided on-site. It also states that on-site play space for children should be provided on sites of 50 or more homes. Given the high densities and small site areas, delivering open space is going to be very difficult on a number of sites, therefore adding further pressure to existing areas of open space.

## **4.0 CONCLUSION**

- 4.1 The Council's plan seeks to significantly reduce the level of housing from between approximately 5,000 – 20,000 homes in the plan period.
- 4.2 The Council have currently planned for a figure below the Government's SM. This in itself is unsound and means the Plan is not positively prepared, even before considering the need to provide a 35% uplift in Sheffield.
- 4.3 The PPG identifies that when an alternative methodology is used, this will be examined in detail and that it should only be done in exceptional circumstances. The Council's reasons are not considered to be exceptional and do not justify either the deviation from the SM with the 35% uplift, or without it.
- 4.4 None of the reasons given are unique to Sheffield. None have been considered suitable for any other authority in the region to do the same and none of them are based on evidence. Consequently, the housing requirement should be significantly increased to meet the SM as a minimum.
- 4.5 The Council's main aim in reducing the housing requirement is to protect the Green Belt and prevent any release of land. This does not consider the impacts on housing mix, the delivery of affordable homes or the delivery of the volume of homes needed.
- 4.6 As a result of this, the distribution to each sub area is reduced given the reliance on city centre sites. The densities are inappropriate for suburban areas. This approach conflicts with several the development management policies that the Council also put forward. These development management policies are aimed at open market housing sites, however these do not match with the high density apartment schemes that have been allocated in the plan.
- 4.7 The need to meet the housing requirement, provide family homes, an appropriate mix, affordable housing and meeting the needs of the various parts of the city are all exceptional circumstances to release land from the Green Belt. Rather than deliver what is necessary and release the land, the Council have been guided by avoiding the Green Belt and subsequently reducing housing need in a way that is unsound.

- 4.8 Further to this, the sites allocated are not considered appropriate to meet the housing need, the sites could be developed under the current planning policies, which raises significant concerns over their ability to deliver. Similarly, the level of homes being proposed in Broad Locations on sites that are potentially undeliverable increases our Clients concerns over deliverability. The Council's current approach has only resulted in a 3.63 year supply, with the plan now continuing this failed approach.
- 4.9 In order to make the plan sound the Council need to increase the level of homes, provide more homes in the outer areas and release Green Belt land.

**ANNEX A – RIGGS HIGH ROAD, STANNINGTON - VISION DOCUMENT (2019)**



# RIGGS HIGH ROAD, STANNINGTON | VISION DOCUMENT

AUGUST 2019

THIS DOCUMENT HAS BEEN PREPARED BY:



01 INTRODUCTION

02 SITE CONTEXT

03 PLANNING AND SUSTAINABILITY CONTEXT

04 OPPORTUNITIES AND CONSTRAINTS

05 INITIAL DEVELOPMENT PROPOSALS

06 GREEN BELT ASSESSMENT

07 DELIVERABILITY

08 SOCIO-ECONOMIC BENEFITS

09 CONCLUSIONS

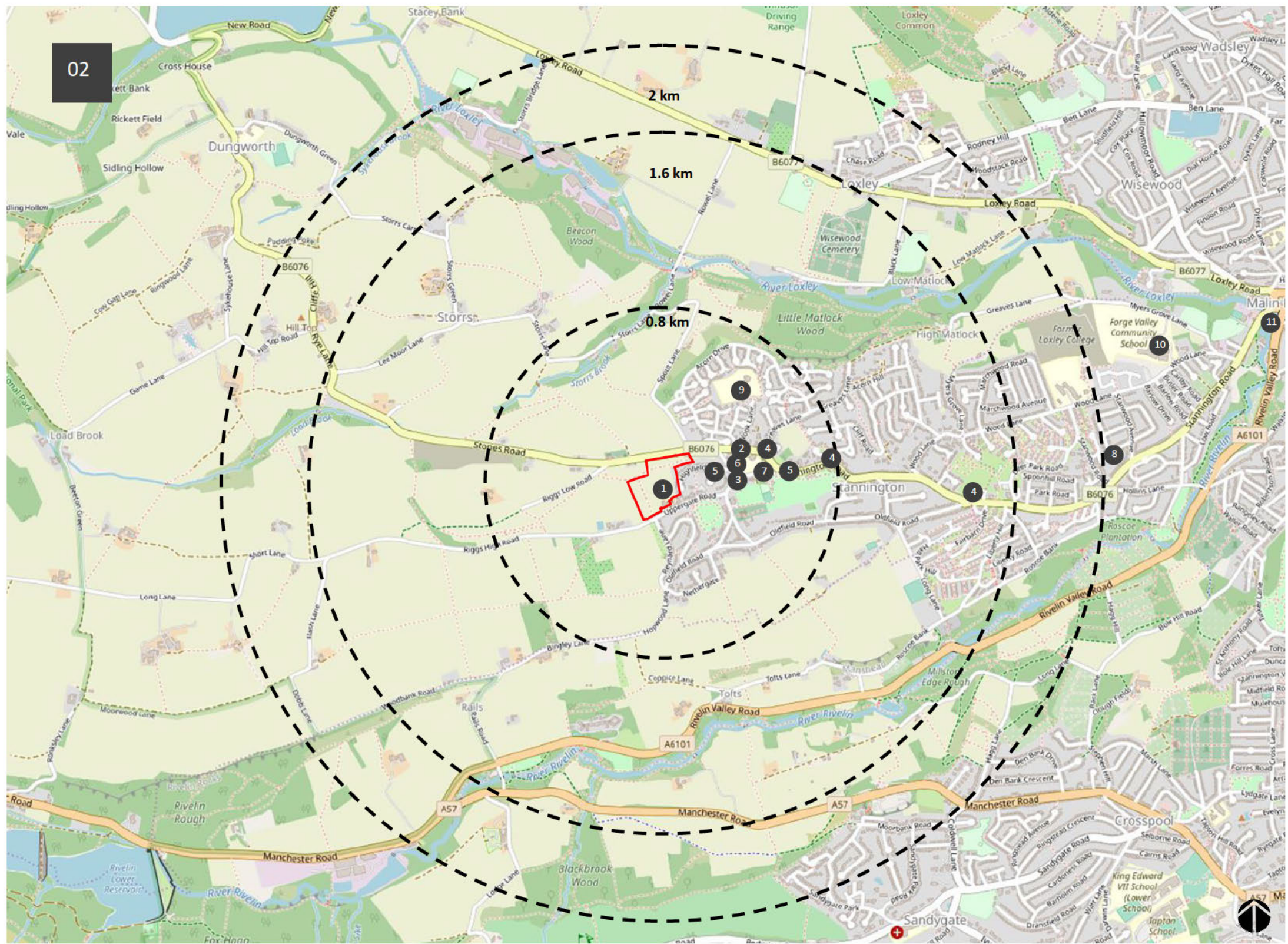


This statement provides evidence to justify the release of Barratt Homes' Riggs High Road, Stannington site as a housing allocation in the forthcoming Sheffield Plan.

The site can deliver a comprehensive development of market and affordable housing alongside a number of community benefits to meet the needs and aspirations of the local area.

The development proposals are situated in a suitable and highly sustainable location in respect of existing settlement form and there are no technical or environmental (built and natural) constraints that would preclude the development of the site.





## Site Context

The site is located within a sustainable location, within walking and cycling distance to a number of facilities and services located within Stannington. The site is located within 300m of Stannington Village Pre-School, Stannington Medical Centre, Christ Church, two public houses and bus stops located on Upper Gate Road. Within 600m lies Stannington Infant School, Stannington Library and a Pharmacy. Nook Lane Junior School is located within 1km of the site and Forge Valley School (secondary education) is located within 2.5km. Finally, Malin Bridge tram stop is located within 3.5km of the site.

- |                                   |                                   |
|-----------------------------------|-----------------------------------|
| 1. Site Location                  | 7. Stannington Library            |
| 2. Stannington Village Pre-School | 8. Post Office                    |
| 3. Stannington Medical Centre     | 9. Nook Lane Junior School        |
| 4. Local Shops                    | 10. Forge Valley Secondary School |
| 5. Public Houses                  | 11. Malin Bridge Tram Stop        |
| 6. Stannington Infant School      | 12. Local Bus Stops               |

The site is located to the west of Stannington. The site currently consists of private open fields with landscape features located adjacent to the site's western and northern boundary. The site benefits from strong defensible boundaries on all sides in the form of the existing residential areas of Stannington to the east, Rigg High Road to the south (which is bordered by a stone wall), Stannington Road to the north (beyond a landscaped bank area) and the aforementioned landscaping to the west. An existing public footpath runs through a central area of the site (north to south) and connects to other footpaths located on the site's northern boundary within the landscaped bank area.

The total site area proposed as a housing allocation extends to 5.6ha and is currently designated within the Green Belt in the Sheffield Unitary Development Plan. The Illustrative Masterplan for the development proposals does however identify that the main proposed residential developable area of the site measures 3.54ha and seeks to maintain the current settlement form of the surrounding area.

The remaining 2.42ha of the site will be used to deliver enhanced landscaping on the site's western and northern boundary, whilst also providing a central area of public open space, flanking the public footpath ensuring that it is maintained in an open setting.

The topography of the site varies, and includes a steeply sloping section to the north with the rest sloping gently and therefore, in this area, does not constitute a constraint to the site's development. The site is located within Flood Risk Zone 1.

Vehicular, pedestrian and cycle access to the site can be taken from Riggs High Road, with further opportunities for footpath connections to Highfield Rise via the public footpaths that run through the site and border its northern boundary.

The site is located within a sustainable location, within walking and cycling distance to a number of facilities and services located within Stannington. The site is located within 300m of Stannington Village Pre-School, Stannington Medical Centre, Christ Church, two public houses and bus stops located on Uppergate Road. Within 600m lies Stannington Infant School, Stannington Library and a Pharmacy. Nook Lane Junior School is located within 1km of the site and Forge Valley School (secondary education) is located within 2.5km. Finally, Malin Bridge tram stop is located within 3.5km of the site.

All of the key services and facilities listed are within walking and cycling distance from the site.

The site is located such that prospective residents will be provided with attractive opportunities for travel by sustainable modes and other measures are possible to further encourage use of these modes.

The site is considered to be positioned in a highly sustainable location.

It is Barratt Homes' view that there are very few other potential housing sites currently located in the Green Belt that benefit from the defensible boundaries and sustainability credentials of Barratt Homes' Riggs High Road, Stannington site.

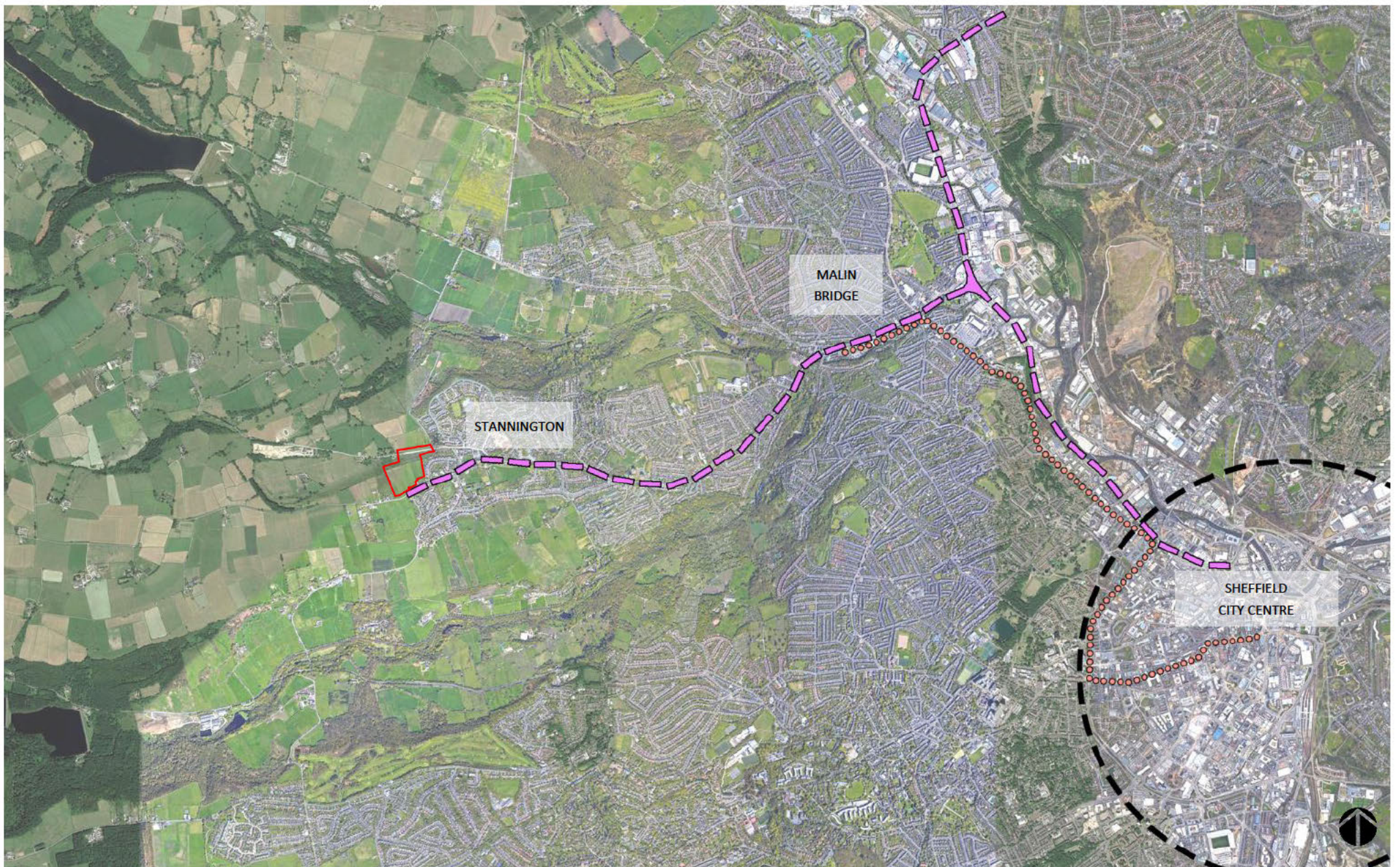
With regard to emerging planning policy guidance, the City Wide Options for Growth to 2034 document identified a provisional view that between 40,000 to 46,000 new homes would need to be delivered within the City between 2015 and 2034.

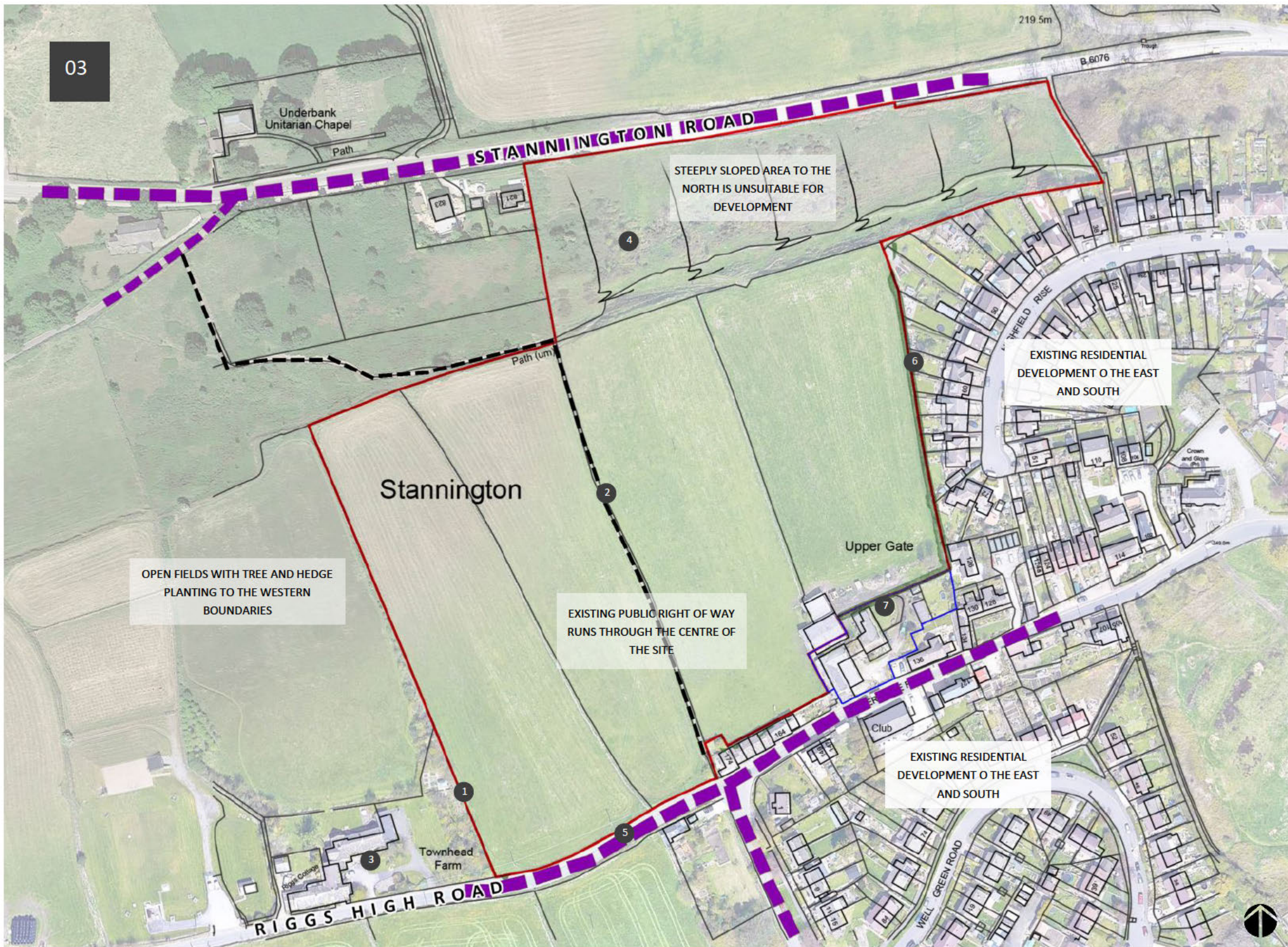
With regards to the release of land from the Green Belt to meet the anticipated housing needs, the report confirms that although there are significant areas of brownfield land available in the urban areas of Sheffield, it is unlikely that all development needs to 2034 can be met on such land. Accordingly, land will need to be released from the Green Belt to meet the City's housing needs.



The document identifies Stannington as a Local Centre located within the Main Urban Area of Sheffield. One of the potential options for housing growth identified within the report includes the potential to release land from the Green Belt to deliver circa 2,000 new homes within the South-East area of the City within which the site is located.

Barratt Homes are keen to work alongside the Council to identify suitable sites to deliver new homes within the City as part of the preparation of the Sheffield Plan. Accordingly, Barratt Homes will provide further evidence to justify the site's release as a housing allocation in response to future consultation on the emerging Sheffield Plan.





## Site Context

The site is located to the west of Stannington. The site currently consists of private open fields with landscape features located adjacent to the site's western and northern boundary. The site benefits from strong defensible boundaries on all sides in the form of the existing residential areas of Stannington to the east, Rigg High Road to the south (which is bordered by a stone wall), Stannington Road to the north (beyond a landscaped bank area) and the aforementioned landscaping to the west. An existing public footpath runs through a central area of the site (north to south) and connects to other footpaths located on the site's northern boundary.

1. Extent of development proposals
2. Existing Public Right Of Way runs through the site
3. Existing adjacent farmstead
4. Steeply sloping area to the north of the development
5. Existing highway to the South of the site
6. Boundary with existing adjacent residential development
7. Boundary with existing adjacent residential development



## Opportunities and Constraints

The total site area proposed as a housing allocation extends to 5.6ha and is currently designated within the Green Belt in the Sheffield Unitary Development Plan. The Illustrative Masterplan for the development proposals does however identify that the main proposed residential developable area of the site measures 3.54ha and seeks to maintain the current settlement form of the surrounding area.

1. Proposed site entrance from Riggs High Road
2. Proposed planted buffer to the western boundary
3. Central greenspace incorporates the existing Public Right of Way
4. Planted buffer at the top of the sloped area to screen views into the site
5. Planted buffer to the south against existing residential development
6. Steeply sloped area is unsuitable for development
7. Amenity of existing residents to be respected



## Initial Development Proposals

The Masterplan provided identifies a size, layout and configuration capable of supporting a sustainable housing scheme of approximately 120 homes providing the ability to meet a range of housing needs including affordable housing.

The site's size can ensure the delivery of substantial benefits to the local area, benefits which a collection of smaller sites may not be able to match.

1. Primary access from Riggs High Road
2. Central green corridor includes complementary planting and retains the public right of way within a safe and pleasant environment
3. Outwards facing development ensures a positive outlook for new residents
4. Planted buffer to the western boundary screens the development
5. Planted buffer at the top of the sloped area screens the development

Utilising the initial technical work that has already been undertaken, Barratt Homes have prepared an Illustrative Masterplan for the proposed development of site.

The Illustrative Masterplan identifies that the development of the site provides the opportunity to deliver the following: -

- A size, layout and configuration capable of supporting a sustainable housing scheme of approximately 120 homes providing the ability to meet a range of housing needs including affordable housing.
- The site's size can ensure the delivery of substantial benefits to the local area, benefits which a collection of smaller sites may not be able to match.
- A landscape-led development which responds to the existing landform, vegetative features and the stone walls / field pattern where possible.
- The opportunity to deliver landscape and biodiversity enhancements including the creation of species-rich, native hedgerows and landscaping areas along open boundaries, including plugging of any gaps within existing hedgerows.
- Delivery of vehicular, pedestrian and cycle access from Riggs High Road.
- The creation and enhancement of strong pedestrian links throughout the site and the adjoining area of Stannington, linking with the existing public footpath that runs through the central area of the site.
- 2.42ha of the site will be used to deliver enhanced landscaping on the site's western and northern boundary, whilst also providing a central area of public open space flanking the public footpath, ensuring that it is maintained in an open setting.

The proposed development of the site would achieve a high standard of design that protects and enhances the local area's setting and character. Providing long term community benefits for existing residents of the area and prospective residents of the site. It will importantly also provide long-term defensible boundaries to the Green Belt in this location of the City.





With regards to the site's current location within the Green Belt we provide below an assessment of the site against the five Green Belt purposes identified in Paragraph 134 of the revised National Planning Policy Framework.

**The development of the site would not result in unrestricted urban sprawl: -**

- The site is located immediately to the west and is contiguous with the existing built-up area of Stannington. A number of residential properties are located to the east and south of the site. Existing landscape features are also present on the site's western and northern boundaries.
- The development of the site provides the potential to deliver enhanced landscaping and planting to provide long term defensible Green Belt boundaries to the west and north of the site; biodiversity enhancements to retain or mitigate biodiversity value; and the provision of significant areas of public open space.
- The spatial layout of the development on the site combined with the creation of strong new boundaries will result in views across the countryside to the west of Stannington remaining open, the built form of the development will not form a greater feature in those views of Stannington than views onto the existing settlement area do currently.
- The development of this land to the west of Stannington would therefore not result in unrestricted urban sprawl; the strong defined boundaries will control development on the site and limit future growth of the settlement.

**The development of the site would not result in the merging of adjacent settlements: -**

- Development on this site would not result in the settlement of Stannington merging with any neighbouring settlements to the west.
- The nearest settlement to the west of the site is a hamlet called Hollow Meadows, located approximately 4 miles from the site. The site is not visually or physically linked to any settlement other than Stannington.
- As well as physical distance, the development would not visually close any perceived gaps between settlements, a clear open gap (with intervening tree cover) would exist and the proposed development of the site would offer additional screening which would therefore serve to increase the perception of the gap between settlements in this location of the City.

**The site does not assist in safeguarding the countryside from encroachment: -**

- No part of the site is defined by Sheffield Council as forming part of an Area of Special Landscape Value and the landscape character of the site can be considered to be transitional urban fringe land. As a consequence, the site relates more to the urban edge to which it is adjoined rather than the open countryside, which means that it does not correctly serve a purpose of reducing encroachment.
- The site does not perform an important role in safeguarding the countryside from encroachment. The site's existing boundaries form a limit to development and the development of the site has the potential to strengthen the site's existing boundaries and also improve access to the countryside.

**The proposed development of the site will have no detrimental effect on the setting and special character of historic features: -**

- The site is not located within a designated Conservation Area.
- The site is located within 400m of Stannington Area of Special Character. However, the existing built up areas of Stannington screen the site meaning it is not visually or physically related to the area.
- The Grade II listed historic buildings King Edward VII Orthopaedic Hospital, Coppice House Farmhouse and Roscoe Bridge are located 1.2 miles to 1.5 miles from the site. The site is not visually or physically related to any of these buildings.
- The Scheduled Ancient Monuments Little Matlock Mill, Low Matlock and Mousehole Forge, Malin Bridge are both located approximately 1.5 miles from the site. The site is not visually or physically related to either of these monuments.
- The proposed development will therefore have no detrimental effect on the setting and special character of historic features.
- The fifth purpose of Green Belt (to assist in urban regeneration, by encouraging the recycling of derelict and other urban land) is a general purpose which will not be adversely affected by the site rather than any other being removed from the Green Belt.
- The enclosed nature of the site means that the openness of the Green Belt would remain, and a new permanent Green Belt boundary would be readily provided through an enhancement to the site's existing northern and western boundary. The loss of the site from Green Belt would therefore not cause overall harm to the purposes of the Green Belt.



## Green Belt Assessment

The development of the site provides the potential to deliver enhanced landscaping and planting to provide long term defensible Green Belt boundaries to the west and north of the site; biodiversity enhancements to retain or mitigate biodiversity value; and the provision of significant areas of public open space. The layout of the development combined with the creation of strong new boundaries will result in views from the west and north remaining open. The built form of the development will not form a greater feature in those views than the existing land uses located adjacent to the site's eastern and southern boundaries.

1. Location of proposed development
2. Built form

Should the site be allocated for residential development, it is envisaged that a planning application will be submitted following the adoption of the Sheffield Plan, which we currently predict to be adopted by the monitoring year 2021/22 at the earliest.

Other than the delivery of the initial site infrastructure there are no other major infrastructure works that need to take place prior to the commencement of delivery of new homes on the site. Accordingly, the development will commence within a year of the submission of the planning application.

Due to the site's size, there would be one development/selling outlet delivering new homes at the site. It is therefore anticipated that the development will deliver a yield of at least 40 homes per annum.

The table below provides the site's cumulative dwelling delivery projection per annum that the Council can use within their housing trajectory. This table is based on the whole site being released following the adoption of the emerging Sheffield Plan.

Year	No of Homes Cumulative
2021/2022	0
2022/2023	40
2023/2024	80
2024/2025	120

The development proposals can therefore deliver significant benefits to the Stannington settlement area and wider City area within the first five-year period of the forthcoming Sheffield Plan, alongside making a significant contribution to the Council's ongoing 5-year housing land supply requirements.

#### **DELIVERABILITY ASSESSMENT**

In accordance with the definition provided within Annex 2 of the revised National Planning Policy Framework, we believe that the site can be considered as a **Deliverable** residential development site on account of:-

#### **SUITABILITY**

The site is located in a suitable location for residential development now. A sustainable development can be delivered at the site with pedestrian and cycle access to existing services, facilities and public transport. A suitable access can be provided from existing highways and there are no technical constraints which would preclude the development of the site for residential use.

#### **AVAILABILITY**

The site is available for development now. The site is available for residential development as there are no legal or ownership constraints as Barratt Homes have an

interest in the site and are expressing an intention to develop the site for residential use.

#### **ACHIEVABILITY**

A viable housing development can be delivered on the site within the next 5 years. Barratt Homes are seeking to develop the site for residential use. Prior to the progression of development sites they undertake a thorough marketing and economic viability assessment for each site, including an assessment of any site specific abnormal costs. The site is considered to be achievable for residential development now as there is a realistic prospect that the site can deliver new homes within the next 5 years.

#### **DELIVERABILITY CONCLUSION**

The site can be considered a deliverable residential development site and its release would deliver significant economic and social benefits in the form of: -

- Creating sustainable communities through meeting market and affordable housing needs, offering existing and potential residents of the City the opportunity to live in the house and location they desire.
- Delivering significant financial contributions towards the improvement of Stannington's and the City's infrastructure, including improvements to local education facilities.
- New capital expenditure in the region of £14.45m creating substantial direct and indirect employment opportunities of approximately 124 new jobs of which 70% are usually retained in the local area.
- Sustaining and improving the City's labour market through delivering the right homes in the right locations.
- Increasing retail and leisure expenditure in the local area by approximately £2.84m per annum, creating 17 jobs in these sectors.
- Provision of funding towards public services from an estimated figure of £1.1m from the Government's new homes bonuses and annual council tax payments of circa £183,000 per annum.
- Safeguarding and enhancing areas of environmental quality through creating on-site and off-site management schemes.

The Riggs High Road, Stannington site is a truly deliverable residential development site that can deliver approximately 120 homes within the first five years of the forthcoming Sheffield Plan, along with a substantial number of social and economic benefits to the settlement and wider City.



**DELIVERY**



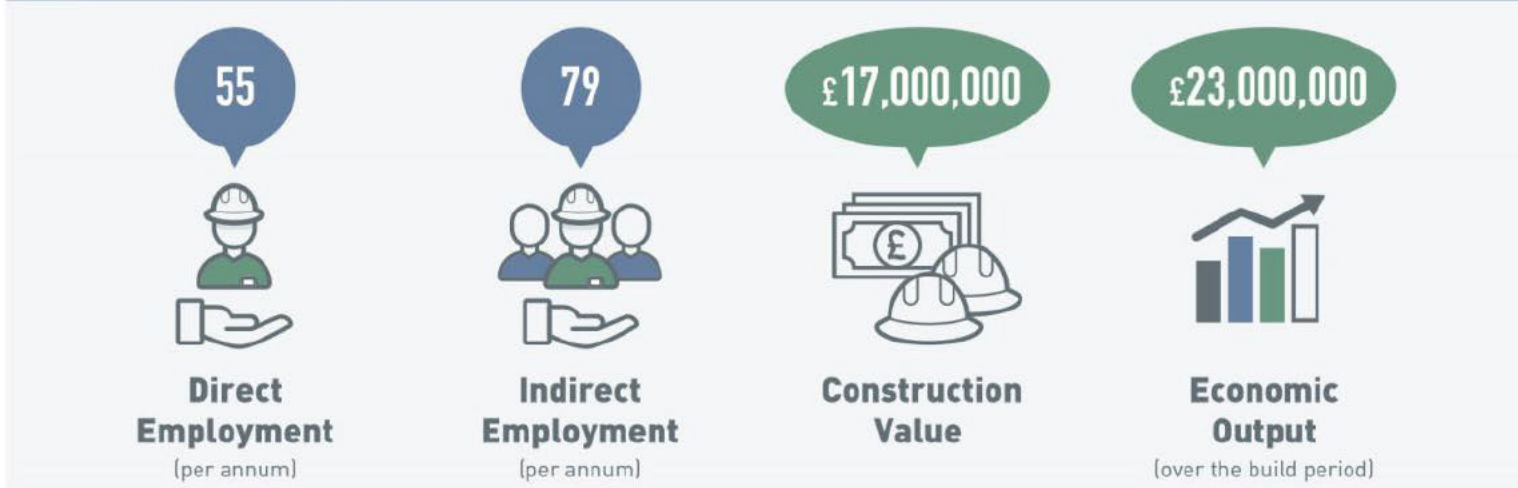
**120** New Homes\* including  
**12** Affordable

## SOCIO-ECONOMIC BENEFITS OF HOUSING AT RIGGS HIGH ROAD, STANNINGTON

We are aiming to deliver **120** New Homes including **10%** Affordable Homes resulting in the following estimated socio-economic benefits

\*Figures are estimates based on current metrics for socio-economic benefits of new residential development

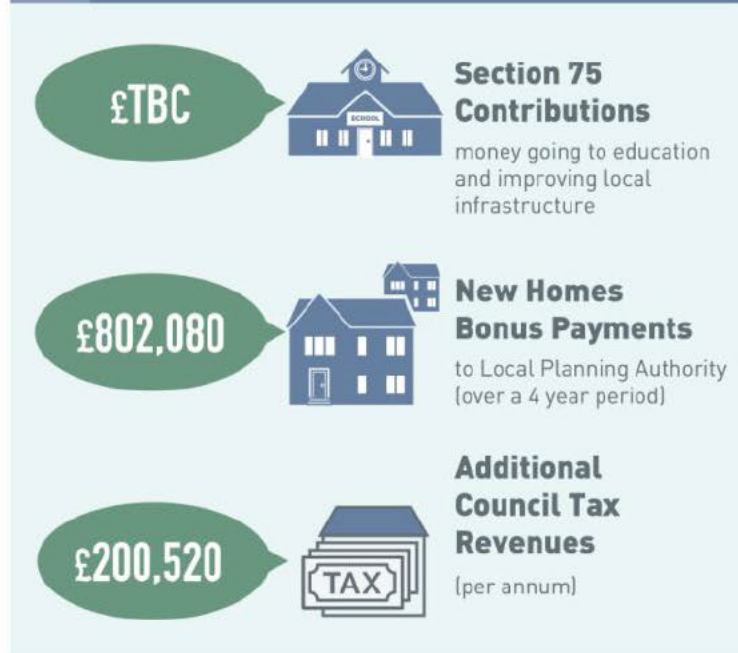
### 1. CONSTRUCTION BENEFITS



### 2. EXPENDITURE BENEFITS



### 3. LOCAL AUTHORITY REVENUE



Barratt Homes' Riggs High Road, Stannington development proposals will create a sustainable, high quality and accessible development which will provide significant social and economic benefits to Stannington and the wider City area.

The site can deliver a comprehensive development of market and affordable housing alongside a number of community benefits to meet the needs and aspirations of the local area over the plan period. The development proposals are situated in a suitable and highly sustainable location in respect of existing settlement form and there are no technical or environmental (built and natural) constraints that would preclude the development of the site.

The enclosed nature of the site means that the openness of the Green Belt would remain, and a new permanent Green Belt boundary would be readily provided through an enhancement to the site's existing northern and western boundary. The loss of the site from Green Belt would therefore not cause overall harm to the purposes of the Green Belt.

Barratt Homes proposals represent a truly deliverable residential development site on account of it being suitable, available and achievable for residential development now.

The site should therefore be allocated for residential development within the emerging Sheffield Plan.





**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** 33129 - Mosborough Barratt David Wilson Homes Written Representations  
**Date:** 20 February 2023 16:41:34  
**Attachments:** [image011.png](#)  
[image012.png](#)  
[image013.png](#)  
[image014.jpg](#)  
[image015.png](#)  
[33129.A3.MW.MosboroughSheffield Reps FINAL.230215.pdf](#)

---

Dear Sir/Madam,  
Please accept the attached as a submission of written representations to the Draft Sheffield Local Plan for Mosborough, on behalf of Barratt and David Wilson Homes.  
Our Client wishes to participate in the hearing session(s) when they occur.  
Please confirm receipt of this email and its attachment.  
Regards,

**Maeve Whelan**  
Graduate Planner



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14 King Street



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# Representations to the Sheffield Draft Local Plan (2022)

Mosborough

Prepared on Behalf of Barratt David Wilson Homes

January 2023



## Representations to the Sheffield Draft Local Plan 2022

### Mosborough

Prepared on Behalf of Barratt David Wilson Homes

<b>Project Ref:</b>	33129	33129
<b>Status:</b>	Draft	Final
<b>Issue/Rev:</b>	V1	V2
<b>Date:</b>	24/01/23	20/02/23
<b>Prepared by:</b>	MW	MW
<b>Checked by:</b>	SN	SN
<b>Authorised by:</b>	SN	SN

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Ref: 33129/A5/MW  
Date: January 2023

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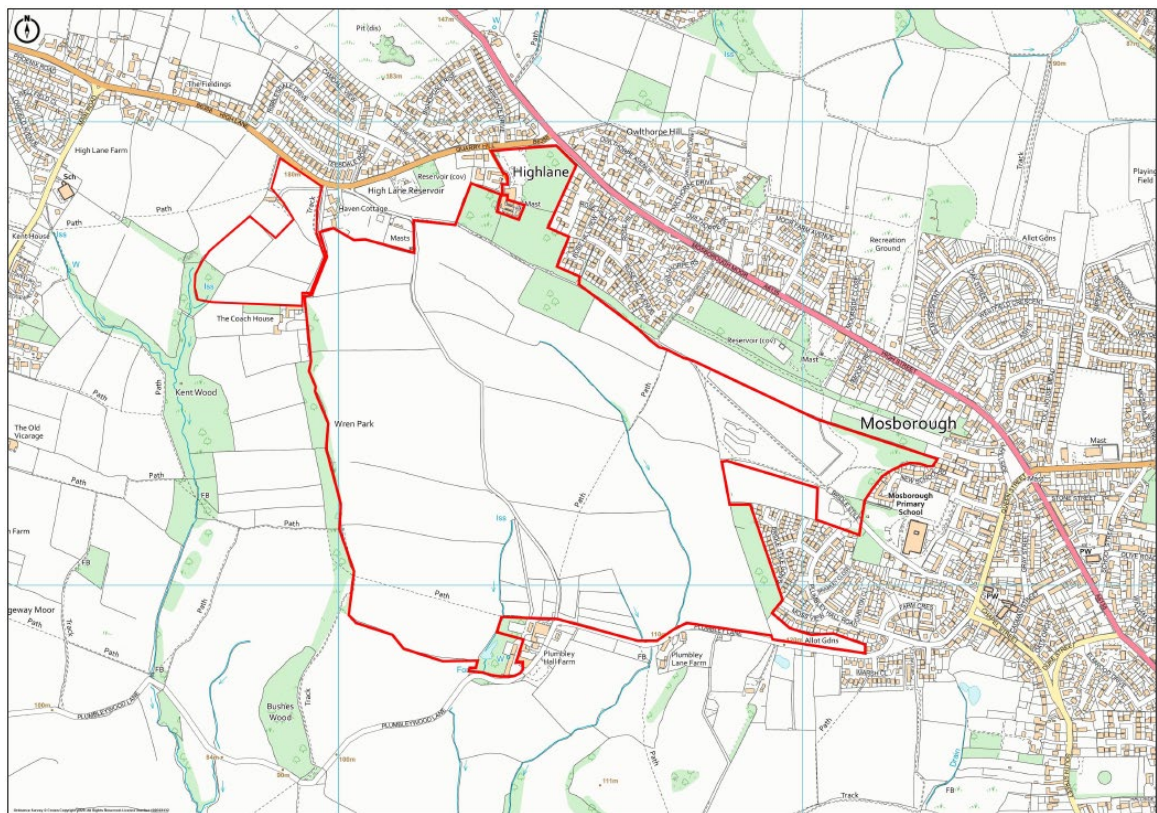
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## 1.0 INTRODUCTION

- 1.1 Barton Willmore, now Stantec (BWnS) has been instructed by Barratt David Wilson Homes (herein referred to as "our Client") to make representations to the Publication Draft of the Sheffield Local Plan (herein referred to as "the Local Plan") which is currently subject to public consultation until 20<sup>th</sup> February 2023.
- 1.2 Our Client represents a key stakeholder and is keen to invest in the district and therefore has a keen interest in the plan making process and welcomes the opportunity to respond to the Local Plan Draft consultation. Our Client is keen to ensure that the Council meets the aspirations for housing and economic growth through the allocation of sufficient and suitable sites through the Local Plan Process.
- 1.3 Our Client controls the below land in Mosborough. Also see annex A for the Vision Document for the Mosborough site.

**Figure 1.1 Mosborough Land**



- 1.4 The NPPF states that in order for a Local Plan to be Considered 'sound' it must be:

**a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs 21 ; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;**

**(b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;**

**(c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and**

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

1.5 This report sets out our Clients representations to the Local Plan update, outlining where our Client believes the Plan does not meet the above criteria and is considered to be unsound.

1.6 The remainder of these representations are therefore structures as follows:

- Section 2: Draft Local Plan Part 1 – Housing Requirement and Distribution
- Section 3: Draft Local Plan Part 2 – Development Management Policies and Implementation
- Section 4: Summary
- Annex A: Mosborough Vision Document

## **2.0 DRAFT LOCAL PLAN PART 1 - HOUSING REQUIREMENT AND DISTRIBUTION**

- 2.1 The Part 1: Vision, Spatial Strategy, Sub-Area Policies and Site Allocations document sets out the vision, overall aims and objectives of the Council. It sets out the scale of proposed growth within the region to 2039 and allocations to deliver this growth.
- 2.1 Our Client has a number of concerns regarding the soundness of the Council's strategy and deliverability of the Plan, principally in regard to the total housing target, and the allocations on which the housing target is to be met.

### **Policy SP1: Overall Growth Plan**

- 2.2 Paragraph 61 of the Framework notes that 'To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.'
- 2.3 The PPG notes that the Standard method is not mandatory if circumstances warrant a different approach, however this is noted as being expected to be more closely scrutinised at examination and 'the expectation is that the standard method will be used and that any other method will only be used in exceptional circumstances.'
- 2.4 Despite these clear indications for the use of the standard method, Policy SP1 establishes the Council's plan for growth, including the need to deliver only 35,530 homes by 2039 (**2,090 homes per annum from 2022 to 2039**). This is a significant shortfall from the standard method and will be met through 297 housing allocations and 19 mixed use developments, primarily within the 'Central Sub-Area' and within 'Broad Locations for Growth'.
- 2.5 The Council appointed IcenI to produce a Housing, Economic Growth and Demographic Modelling report in July 2021 in order to justify the significant reduction from the level of homes required. That report demonstrates at paragraph 2.18 that the time of writing the level of homes required to meet the standard method was 49,691 homes.
- 2.6 This has been superseded by the Council's 5-Year Housing Land Supply Monitoring Report published in December 2022, which updates the position. This report acknowledges that the minimum number of homes needed in each local authority area must be calculated using the Government's Standard Method (SM). In December 2020 the 35% uplift was introduced for the 20 largest towns in cities in England. Therefore, Sheffield's base

figure is uplifted from **2,236 (38,012 total over plan period) to 3,018** homes per annum.

2.7 If this figure is applied to the 17 years of the plan period (2022-2039), it equates to **51,306** dwellings over the plan period (3,018 x 17). This results therefore, in a short falling of **15,776** dwellings (51,306 - 35,530) from the SM figure.

2.8 The committee report from the 3<sup>rd</sup> November Extraordinary meeting of the Transport, Regeneration and Climate Policy Committee stated that the Cooperative Executive were mindful that the SM provides a 'starting point' for housing requirement, and that other factors (such as the Green Belt) need to be considered when setting a housing target, despite the 2022 5-Year Housing Land Supply Monitoring Report acknowledging that the SM figure should be used as a minimum figure.

2.9 Paragraph 6.5 of that report notes,

*Several important factors have determined the growth plan and overall spatial strategy proposed in the Draft Sheffield Plan:*

*a) Under the National Planning Policy Framework (NPPF), strategic policies in the local plan do not have to meet the objectively assessed needs for housing and other uses if expansion of the urban areas is constrained by Green Belt. The Green Belt Review shows that almost all the land designated as Green Belt continues to perform at least one of the purposes of Green Belt.*

*b) Releasing greenfield land in the Green Belt for development now has a high risk of undermining efforts to reuse the substantial supply of brownfield sites in the City Centre and other parts of the urban area. It would also cause significant harm to the city's biodiversity and would undermine the city's reputation as the 'Outdoor City'. The adverse impacts of meeting the full need therefore significantly and demonstrably outweigh the benefits of meeting the need for housing and other development when all Page 50 Page 41 of 49 factors are considered.*

*d) Demographic analysis by Icen Projects (see paragraph 1.6.5- 1.6.7 above) shows that the city's economic growth plans require an annual housing requirement within the range 1,994-2,323 homes per year and that this can be achieved by developing land within the existing urban areas. No harm would therefore be caused by setting the housing requirement at the level (2,100 homes per year) proposed in the Draft Plan.*

***g) Adopted local plans elsewhere in South Yorkshire and Derbyshire currently provide 'headroom' in terms of meeting the Government's annual housing need figure across the wider city region.***

- 2.10 The PPG is clear that any alternative approach must be exceptional. The Council's reasons for using a significantly lower figure are generally based on large parts of the district being Green Belt, a potential adverse impact on biodiversity and the Council's reputation as a green city, alternative economic assessment and other neighbouring authorities meeting Sheffield's needs by over delivering in their plan.
- 2.11 Our Client does not consider that these reasons are exceptional and as such the justification exists in order to significantly reduce the level of homes.
- 2.12 Taking each of these in turn, Sheffield, amongst a number of other northern cities is surrounded by the Green Belt. However, this in itself is not exceptional, nor should it restrict the level of homes being developed. In recent years Leeds, York, Bradford, Calderdale, Kirklees, Wakefield, Barnsley and Rotherham have all adopted plans with the need to amend Green Belt boundaries to meet their housing needs.
- 2.13 None of these authorities noted that the Green Belt was sufficient justification in isolation to not meet their housing needs. Indeed, all these authorities noted the need for homes and that in order to meet their needs exceptional circumstances exist to release land from the Green Belt. Based on any reduction in homes, jobs, and the associated impact on local services together with the sustainability impacts locating all new homes in existing built-up areas would have ultimately determining that not meeting their needs would have an adverse impact on the plan as a whole.
- 2.14 Such an approach as that advocated by the Council invariably results in the loss of open spaces, a reduction in affordable housing provision and impacts on mix with high density schemes being predominantly one and two bedroom apartments. None of these points appear to have been considered in any of the evidence put forward by the Council in seeking to reduce the level of homes and the impact this would have. This is particularly notable in the Sustainability Appraisal, which is considered unsound.
- 2.15 With regards the impact on biodiversity and the 'outdoor city', there is no evidence on how meeting the minimum housing need would impact either of these, nor how Sheffield is different to any other city in these regards. The 'outdoor city' status is not evidenced and is not subject to any planning policies, similarly there are no specific wildlife habitats or designations unique to Sheffield or in significant quantity that the housing need could affect it adversely.

- 2.16 With regards to the ability to meet their economic needs with a lower level of housing, it is noted that Sheffield’s population is aging and the need for working age population will need more homes. The report is predicated on increasing the workforce from the existing population and equally indicates a range, of which the Council have chosen the lowest possible figure.
- 2.17 Whilst we consider there are issues with the IcenI approach, the SM is not based purely on meeting job needs. The SM considers demographic change, affordability and meeting economic needs. The Council have solely focussed on economic needs in the IcenI report and consider the job growth can be met with lower levels of housing. This is therefore not considered to be an exceptional circumstance to fail to meet the city’s needs as it does not consider the needs of all, housing mix, house types, affordable need and the impact on these of reducing the level of homes.
- 2.18 Finally, the report references the ability to reduce the level of homes in Sheffield as there is sufficient headroom from neighbouring authorities who have over-delivered. The PPG is abundantly clear that the 35% uplift is to be met within the 20 most populated cities and not passed to neighbouring authorities. This reference demonstrates that Sheffield is effectively retrospectively moving their uplift to other authorities in direct conflict with the guidance.
- 2.19 Given the Council’s reasons there are no exceptional circumstances to not meet their needs. The reasons given apply to almost any Green Belt authority and if found sound and replicated elsewhere, would result in a significant shortfall regionally, and nationally.
- 2.20 The table below demonstrates the possible combined shortfall in dwellings from the reduced SM and uncertain ‘Broad Locations for Growth’ referenced later in these representations.

**Table 2.1 Possible short fall in dwellings**

Consultation Draft Plan target	Consultation Draft plan Target minus Broad Locations for Growth	SM (no uplift)	SM (with 35% uplift)	SM (no uplift) vs Draft Plan Target	SM (no uplift) vs Draft Plan (minus Broad Locations for Growth)	SM (with Uplift) vs Draft Plan (with Broad Locations for Growth)	SM (with uplift) vs Draft Plan (minus Broad Locations for Growth)
35,530	30,855	38,012	51,306	= 2,482	38,012 – 35,530 = 2,482	51,306 – 35,530 = 15,776	51,306 – 30,855 = 20,451



- 2.21 Each combination results in significant under supply of homes ranging from 2, 482 homes to 20,451 homes. Simply applying the governments methodology results in a shortfall of 15,776 homes, almost 1000 per year. The negative impacts that this then has on mix and affordable housing is clearly not outweighed by the Council's reasoning.
- 2.22 Our Client therefore, believes that the housing target needs to be reviewed. As a result, sustainably located Green Belt sites which could significantly contribute to the housing target should be reassessed and will need to be included in the plan.
- 2.23 Our Client strongly objects to this significant reduction in housing provision and argues that by so severely limiting the target figure, the plan is unsound. In its current form, the Plan is not positively prepared as it does not meet the SM figure. It is unjustified as it does not consider options for Green Belt release and is not effective as the allocations chosen are extremely tightly constrained and likely undeliverable in some places.

**Policy SP2: Spatial Strategy**

- 2.24 Policy SP2 states that the majority of future growth will be on previously developed land in the Main urban Area and the two principal towns of Stocksbridge/Deepear, and Chapeltown/High Green. Policy H1 expands on this to set a target of 85% of all new homes to be delivered on previously developed land. This target is unique, has not been met in any other areas and historic delivery demonstrates it as unachievable. To establish a settlement hierarchy, distribution and site allocations on this premise significantly undermines the deliverability of the plan and the soundness.
- 2.25 It is clear from the resolutions and debate in various Council meetings and Committees, that the Council's primary driving factor in progressing the plan is to avoid the need for development in the Green Belt and where possible greenfield sites. As a consequence, the plan has been drafted in a way to meet this primary aim, to the detriment of the delivery of homes and meeting the needs of the residents of Sheffield. The reduction in the overall level of homes is explicitly in order to meet this policy requirement.
- 2.26 Our Client objects to this policy and the overarching aim in the plan that is established and thereafter used to assess the distribution and selection of housing allocations. The primary basis for this is that it is considered the plan will not be effective and not positively planned, therefore unsound.
- 2.27 There are currently no policy restrictions on any of these sites being brought forwards. Previously developed sites within the city are supported in both the Council's current plan and National Planning policy. The adoption of a new plan and allocation of these

sites does not unlock these sites, it does not provide a new policy basis for their delivery, and it offers further restrictions than in the current plan in terms of standards, affordable housing requirements, space standards and environmental guidance.

- 2.28 Whilst our client has no in principle issues with the increase in standards, if these sites have not previously been brought forward, increasing the impact on climate change (Policy EC1) adding costs, NDSS etc are likely to add further deliverability issues.
- 2.29 Sheffield's housing delivery has consistently been below the required levels established in both the 5 year land supply and the housing delivery test. Currently the Council's own evidence demonstrates only a 3.63 year land supply.
- 2.30 A significant contributor to this has been the lack of an up-to-date plan, the lack of deliverable allocations and a reliance on windfall housing. The Council's plan, effectively seeks to allocate the sites that have failed to deliver as windfall homes over recent years. It is clear that Sheffield needs an up to date plan, however the importance of this is to meet housing needs, which has not been done for some time, to provide an appropriate level of affordable homes, which has not been done for some time and to meet the needs of families and younger people.
- 2.31 The city needs a step change in housing delivery and the only way to do that is through the adoption of an up-to-date plan providing a clear change in policy approach and the release of deliverable sites to deliver the type of homes that are needed in sustainable locations in the whole city. Unfortunately, the Council's approach has resulted in a significant reduction of the level of homes it plans to deliver and also a continuation of existing policies that have failed.
- 2.32 The adverse impacts of the Councils approach can be seen in the distribution of housing within the Local Plan area. As can be seen in the table below, the Central Sub-Area is to deliver a disproportionately high number of dwellings with 65% of new homes being delivered in the central area, whilst other areas such as the Southwest only receive 3% of all homes (80 allocated sites without permission), Stocksbridge/Deepear 4% of all homes (273 allocated sites without permission), and Chapeltown/High Green (0 allocated sites without permission) are to deliver significantly fewer homes.

**Table 2.2 Potential Housing Distribution**

Sub-Area	Potential Number of Homes 2022-2039			
	Large sites with Planning Permission* (not Allocated)	Allocated Sites with Planning Permission*	Allocated Sites without Planning Permission	TOTAL
Central	280	7,865	10,320	<b>18,465</b>
Northwest	20	670	325	<b>1,015</b>
Northeast	180	300	485	<b>965</b>
East	45	1,175	1,720	<b>2,940</b>
Southeast	35	380	1,225	<b>1,640</b>
South	0	330	420	<b>750</b>
Southwest	55	620	80	<b>755</b>
Stocksbridge/ Deepcar	15	640	273	<b>928</b>
Chapelton/ High Green	0	25	0	<b>25</b>
<b>Total</b>	<b>630</b>	<b>12,005</b>	<b>14,848</b>	<b>27,483</b>

- 2.33 The Southeast Sub-Area where our Client controls a large portion of land at Mosborough (see figure 1.1 and annex A) is planned to only deliver 1,640 homes, this equates to approximately just 5% of the total homes.
- 2.34 By choosing to focus the delivery of housing to the Central Sub-Area, the Council have overlooked the constraints on many of these sites in favour of developing previously developed land over greenfield and Green Belt land. While our Client acknowledges the importance of the redevelopment of brownfield sites, it is their view that focusing such a high proportion of homes in one area is undeliverable and unsustainable and therefore object to this policy.
- 2.35 Many of the sites do not lend themselves to such high levels of housing and it is our Clients key concern that focusing delivery in these areas will severely limit the mix and type of housing possible which will inevitably exclude some groups. Therefore, our Client objects to this Policy and believes it makes the Plan unsound.
- 2.36 Table 2 included in the plan and replicated above also shows the historic low delivery in the outer areas, such as Southeast Sheffield. This Sub-Area only has 380 homes that are allocated with planning permission, showing a lower historic level of applications, approvals and delivery. Given none of the sites allocated require the plan to deliver the homes, the historic low levels of delivery in these areas does not provide justification to allocate the sites chosen.

- 2.37 This is particularly relevant in the southeast sub area, where only 380 homes allocated have planning permission and 1,225 of those allocated require planning permission. Whilst this is not unusual in most plans, given Sheffield are only allocating sites that currently benefit from policy support, the lack of historic delivery is concerning and demonstrates a need for a change in approach in this area.

#### **Policy SA1: Central Sub-Area**

- 2.38 Central Sub-Area will be the focus of residential development delivering approximately 18,640 new homes through existing planning permissions and new allocations.
- 2.39 Our Client rejects to this disproportionately high housing figure for this Sub-Area. This figure makes up approximately 67% of the total figure included in table 2.2.
- 2.40 As these representations go on to detail, our Client has key concerns over the delivery of this high target on the existing small sites in this Sub-Area, and the housing mix and type this scale of development in the city centre will entail. Significantly, Policies NC3 Provision of Affordable Housing, Policy NC5 Creating Mixed Communities, Policy NC8 Housing Space Standards, and Policy NC9 Housing Density significantly further limit the space and scope of possible development. Therefore, our Client objects to this Policy on the grounds that a too heavier focus of development in this region will limit the scale, quality and mix of housing development.

#### **Policy SA5 – Southeast Sub-Area**

- 2.41 Our Client objects to the level of Homes in South East Sheffield. This Sub-Area, includes part of the main urban area, large settlements, district centres and smaller villages. All of these existing areas have services and businesses that require growth to maintain viability, however the plan only aims to deliver 1,640 homes in the plan period. For such a large part of the city, with a significant population, number of settlements and existing services, this level of development is significantly less than what is necessary.

Mosborough and Owlthorpe only have two allocations, despite the significant level of facilities and services. The whole sub-area is effectively constrained by the Council's ambitions to reduce housing targets and only deliver on previously developed land. As a consequence, this sub area receives far less homes than necessary as the homes planned for are based on available land not actual need. This approach is considered to be unsound.

#### **Policy H1: Scale and Supply of New Housing**

- 2.42 Policy H1 sets the approach to delivering the level of homes and distribution defined in Policies SP1 and SP2 and therefore reiterates those provisions in Policy SP1 and SP2. Policy H1 however goes further than referencing that the majority of homes are built on previously developed land and sets out a target of delivering 85% of all homes to be delivered on previously developed land.
- 2.43 The 85% target has no evidential basis to demonstrate deliverability and is therefore unsound. Anecdotally, no other Local Plan area in the region has managed to deliver anywhere near this level of homes on previously developed land or even aspire to in their plans on the basis that it is clearly not deliverable or sustainable. This includes similar geographic and demographic areas, such as Leeds, Bradford and York, who have all required on significant delivery on greenfield and Green Belt sites.
- 2.44 Policy H1 also provides the framework for how the Council will deliver the level of houses it plans for, including through sites that already have planning permissions, on identified housing allocation sites and in Broad Locations for Growth.
- 2.45 In regard to 'Broad Locations for Growth' the Plan states:
- "The Council's analysis suggests that together, developable sites in the Broad Locations for Growth and windfalls on larger sites in other areas, could provide around 4,675 additional homes. This is over and above the Site Allocations and windfalls on small sites. Much of the additional developable supply is likely to be delivered after 2029 (years 6-15 of the Plan period)."**
- 2.46 Table 1 Housing Land Supply 2022 - 2039 sets out how these different categories of housing will contribute to the overall target, with 630 homes already with planning permission, 26,853 on allocated sites, 3,400 homes on windfall sites and 4,675 homes on the broad locations for growth.
- 2.47 One in seven of the homes developed in the plan period are envisaged in the Broad Locations for growth, noted in the plan as areas that **'are already transitioning or have the potential to transition from employment uses to housing.'** Further noting that **'There is not yet sufficient certainty to allocate all the land that is potentially suitable for housing in these areas. Further work is needed to assemble sites, relocate existing uses, and plan for new infrastructure.'**
- 2.48 It is clear that these Broad Locations are currently in use, have not been promoted by the existing landowners, require relocation (if the landowners are even willing) and significant infrastructure. There is no certainty that these sites are even available, let alone developable and as such they should not be included in the land supply.

- 2.49 Our Client strongly objects to the use of these locations for contributing to the housing target. There is no guarantee that these sites can successfully come forward. Indeed, the Plan states that many of these sites have multiple owners, and that public intervention will be needed to ensure these sites can be successfully transitioned from employment to residential land.
- 2.50 The capability of these sites delivering the potential 4,675 dwellings is uncertain and therefore, should not be included in the total housing target. As a result, the 4,675 should be reallocated to alternative deliverable sites in order to secure housing delivery within the Plan period.
- 2.51 Moreover, the release of Green Belt sites in the Sub-Areas which intend to utilise Broad Locations for Growth, should be considered.
- 2.52 Our Client controls land in the Southeast Sub-Area. In particular, the Green Belt site in the Southeast has a proposed capacity of between 200 and 2,000 dwellings. The inclusion of this site as an allocation could make a significant contribution to the housing target for the Southeast Sub-Area and may negate any uncertainty over delivery in the area caused by the Broad Locations for Growth.
- 2.53 Policy H1 also includes a provision for 3,400 windfall sites later in the plan. Windfall should only be included if it can be proven as deliverable. The Council have relied upon windfall due to the lack of an up to date plan, hence recent figures being high, however many of the potential windfall sites are now allocated, significantly reducing the ability for windfall to come forward in the future.
- 2.54 This is acknowledged in the plan as the Council do not plan for any windfall in years 1-5 of the plan. Given the Council are using up the majority of sites, previously considered windfall and do not include any in the early stages due to the lack of sites, it is unreasonable to then include windfall in the latter years. Given the constraints and significant reliance on broad locations, which are also unallocated sites, a provision for 3400 homes from windfall is not positively planned or justified and therefore unsound.

### **D1: Design Principles and Priorities**

- 2.55 This Policy states that:

**“Development should be sustainable, beautiful, functional, of high-quality, and should respect, take advantage of, and enhance the characteristic features of the city, its settlements, districts, and neighbourhoods”**

2.56 Whilst Our Client supports the need for high quality development, policies should reflect national planning policy and also be clear in their requirements. They therefore object to this Policy as worded as it does not provide clarity and the ability to comply with its requirements are solely subjective with no clear guidance. Terms such as 'beautiful' and 'high-quality' design mean different things to different decision makers and result in difficulties to positively prepare applications. The policy therefore requires amendment in order to make it sound.

### **3.0 PART 2 OF PLAN – DEVELOPMENT MANAGEMENT POLICIES AND IMPLEMENTATION**

3.1 A Number of the policies in part 2 of the plan contribute to our Client’s concerns over the deliverability of the allocated sites and the need for more homes to be allocated. The Council’s sites are broadly city centre and urban area sites, developed at a high density of predominantly smaller properties at the lowest level of affordable housing.

3.2 This approach therefore conflicts with the policies in Part 2 on density, housing mix, the need to provide on site open space, NDSS compliance and the need for larger properties. These are outlined below as it is not considered possible to comply with the Part 2 policies on the allocations and no evidence is provided from the Council that those policy requirements have been included when setting the capacity of each site.

3.3 For example, if open space is provided on all sites and only fifty percent of the properties are one-bedroom properties together with meeting NDSS, this could significantly reduce the level of homes that can be delivered on certain sites. Without evidence the capacities are deliverable with these policy requirements the plan is unsound.

#### **3.4 Policy NC3: Provision of Affordable Housing**

3.5 Under this policy it is stated that on sites for 10 or more dwellings a minimum 10% contribution of affordable housing is expected. This figure rises to 30% in just the Northwest, South and Southwest affordable housing market areas.

3.6 The Council’s most viable areas receive some of the lowest levels of housing, showing the need for more homes in those areas. Given the majority of homes are in the 10% area it is highly unlikely the needs will be met and as such a further uplift should be included in the housing requirement.

#### **Policy NC5: Creating Mixed Communities**

3.7 Policy NC5 states that for developments of 30 or more homes in the city centre, no more than half the homes should consist of one-bedroom apartments and studios and requires a greater mix of house types on development of 30 or more homes outside the city centre.

3.8 The plan relies on a number of large high-density sites, with no evidence on the mix or the ability to deliver those numbers with the restriction of one bedroom apartments. Further evidence needs to be shown that this is deliverable, and the level of homes can be delivered in the plan when applying all policies in the plan.

#### **Policy NC8: Housing Space Standards**



- 3.9 This Policy states the new housing development should comply with national space standards, should demonstrate adequate living space is provided, be flexible and adaptable to the changing needs of occupants, provide appropriate outdoor private amenity or garden space, and not result in loss of existing garden space.
- 3.10 Our Client acknowledges raises concerns whether this has been factored into the deliverability of the allocations. The allocated sites are being developed at very high density and applying NDSS may restrict their ability to meet the level of homes needed.
- 3.11 The Policy should also consider the likely demand for home working spaces and the delivery of first floor uses that are not bedrooms. At present any upper floor room would have to meet bedroom sizes, whereas a small home office may be appropriate. On this basis flexibility should be added into the policy.

#### **Policy NC9: Housing Density**

- 3.12 Under this Policy, density ranges are set out for the following areas; within or near to the Central Area (at least 70 dwellings per hectare); within or near to District Centres (50 to 80 dwellings per hectare); within easy walking distance of tram stops and high frequency bus routes (40 to 70 dwellings per hectare); an remaining parts of the urban area (35-50 dwellings per hectare).
- 3.13 These densities are significantly higher than neighbouring authorities and are not considered to reflect the characteristics of areas, rather they are designed to increase the density of schemes and reduce the overall number of sites to be allocated. Policy NC5 seeks to provide a mix of type and size of homes and to provide homes for large households. Policy NC5 and 9 are therefore in direct conflict as it would not be possible to deliver these aspirations on sites with a density of over fifty dwellings.

#### **Policy NC15: Creating Open Space in Residential Developments**

- 3.14 This policy states that for developments with a capacity less than 100 dwellings, provision of open space off-site will usually be acceptable but greenspace and landscaped areas should be provided on-site. It also states that on-site play space for children should be provided on sites of 50 or more homes. Given the high densities and small site areas, delivering open space is going to be very difficult on a number of sites, therefore adding further pressure to existing areas of open space.

## **4.0 CONCLUSION**

- 4.1 The Council's plan seeks to significantly reduce the level of housing from between approximately 5,000 – 20,000 homes in the plan period.
- 4.2 The Council have currently planned for a figure below the Government's SM. This in itself is unsound and means the Plan is not positively prepared, even before considering the need to provide a 35% uplift in Sheffield.
- 4.3 The PPG identifies that when an alternative methodology is used, this will be examined in detail and that it should only be done in exceptional circumstances. The Council's reasons are not considered to be exceptional and do not justify either the deviation from the SM with the 35% uplift, or without it.
- 4.4 None of the reasons given are unique to Sheffield. None have been considered suitable for any other authority in the region to do the same and none of them are based on evidence. Consequently, the housing requirement should be significantly increased to meet the SM as a minimum.
- 4.5 The Council's main aim in reducing the housing requirement is to protect the Green Belt and prevent any release of land. This does not consider the impacts on housing mix, the delivery of affordable homes or the delivery of the volume of homes needed.
- 4.6 As a result of this, the distribution to each sub area is reduced given the reliance on city centre sites. The densities are inappropriate for suburban areas. This approach conflicts with several the development management policies that the Council also put forward. These development management policies are aimed at open market housing sites, however these do not match with the high density apartment schemes that have been allocated in the plan.
- 4.7 The need to meet the housing requirement, provide family homes, an appropriate mix, affordable housing and meeting the needs of the various parts of the city are all exceptional circumstances to release land from the Green Belt. Rather than deliver what is necessary and release the land, the Council have been guided by avoiding the Green Belt and subsequently reducing housing need in a way that is unsound.

- 4.8 Further to this, the sites allocated are not considered appropriate to meet the housing need, the sites could be developed under the current planning policies, which raises significant concerns over their ability to deliver. Similarly, the level of homes being proposed in Broad Locations on sites that are potentially undeliverable increases our Clients concerns over deliverability. The Council's current approach has only resulted in a 3.63-year supply, with the plan now continuing this failed approach.
- 4.9 In order to make the plan sound the Council need to increase the level of homes, provide more homes in the outer areas and release Green Belt land.

**ANNEX A: MOSBOROUGH – VISION DOCUMENT**

FEBRUARY 2023

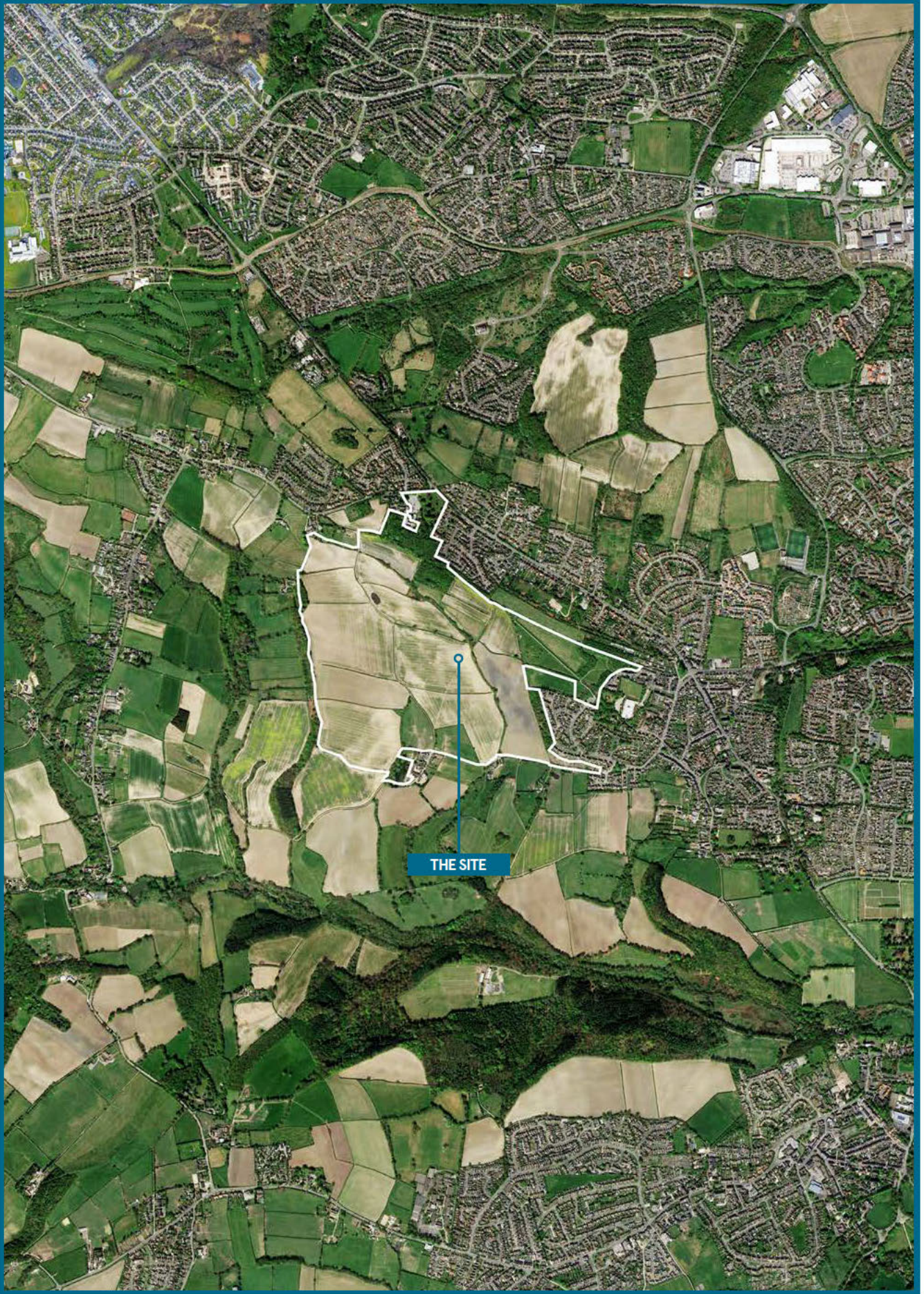


A SUSTAINABLE  
URBAN EXTENSION  
**MOSBOROUGH**  
SHEFFIELD



**BARRATT**  
DEVELOPMENTS PLC

**BARTON  
WILLMORE** now  **Stantec**



THE SITE

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# 1 INTRODUCTION

*The land at Mosborough is being promoted by Barton Willmore on behalf of Barratt and David Wilson Homes with assistance from Royal Pilgrim Communications. The team have extensive experience in promoting and delivering large scale urban extensions and homes across the region. Further information on the team is included below.*

## BARRATT DAVID WILSON HOMES

Barratt David Wilson Homes (BDWH) is the nation's leading housebuilder, creating great new places to live throughout Britain.

Our business is acquiring land, obtaining planning consents and building the highest quality homes in places people aspire to live. This is supported by our expertise in land, design, construction and sales and marketing.

Our vision is to lead the future of housebuilding by putting customers at the heart of everything we do.

## BARTON WILLMORE, now STANTEC

From large-scale inner city regeneration to urban extensions and the creation of new communities, Barton Willmore, now Stantec provide everything from conceptual proposals, to Urban Design strategies and Development Frameworks, all based upon analysis, evaluation and engagement.

The Masterplanning & Urban Design teams bring a wide range of skills and knowledge to projects, enabling us to secure the delivery of imaginative and commercially viable design-led solutions that benefit the investor and the wider community. We are accomplished in placemaking and providing distinctive and sustainable developments based on a firm understanding of integration into existing movement networks, the current landscape or the surrounding urban fabric.

## ROYAL PILGRIM COMMUNICATIONS

Created through bringing together two successful businesses, Royal Pilgrim Communications was established in 2018, to offer expert communications advice in the built environment sector.

The experienced teams of Resolve Public Affairs and Pilgrim PR were forged together to create a new powerhouse in the sector with unique knowledge and an unrivaled track record of successful delivery of planning permissions and projects.

They work across the UK on development projects, planning applications and strategic sites and corporate clients – working with local, national and international developers, retailers, local authorities and land promoters on a huge range of sites and sectors.





## 2 DEVELOPMENT AT SCALE

*Large scale urban extensions or standalone new settlements have become a key component in meeting housing delivery across the region in recent years.*

### PLANNING CONTEXT

National policy and government guidance supports the inclusion of large scale residential developments with associated facilities and infrastructure in local plans and their strategic nature can assist in meeting housing in both existing and future plan periods. Large scale urban extensions can provide a significant contribution to the cities housing needs without the need for significant release of Green belt across the city. The scale of development allows for infrastructure, services and facilities to all be included in the scheme, including education, retail and commercial uses, providing a sustainable development.

### RELEVANT EXAMPLES

In recent years this approach has been successfully adopted by a number of local authorities in the region, including:

- **Harrogate** - A new standalone settlement for 4,000 homes, commercial development, local centre and education provision, with significant parkland and open space;
- **York** - Two new standalone settlements for 1,300 and 3,000 homes, together with substantial urban extensions of 850 homes;
- **Selby** - The revised local plan is in the process of selecting one of three options for a 2,000 home new settlement; and
- **Calderdale** - two large urban extensions of 1,000-1,500 homes.

### BENEFITS OF THIS APPROACH

From our combined experience of promoting large scale extensions we have noted a number of key benefits:

- Delivering sustainability from day one with early phases located close to, and supporting, existing facilities whilst new facilities develop over time as more homes are built;
- Minimising risk at local plan examination by delivering a large number of homes on one site, with focussed objection, rather than a reliance on a number of sites in multiple locations generating a wider spread and greater amount of objections;
- Delivering a number of local infrastructure improvements as part of the development rather than contributions to wider schemes; and
- Creating new and inclusive communities with a distinct identity.

### LESSONS LEARNED

From experience the larger sites that have failed at local plan examination (notably Leeds), have been as a result of insufficient technical information, questions over the deliverability of schemes, inappropriate lead in times and build out rates and the process. Successful local plans and large sites have predominantly been planned for at an early stage, included in all versions of the plan, included a develop to deliver and have been subject to significant technical assessment to prove deliverability.

## 3 SHEFFIELD'S CONSTRAINTS TO GROWTH

### OPPORTUNITIES & CONSTRAINTS

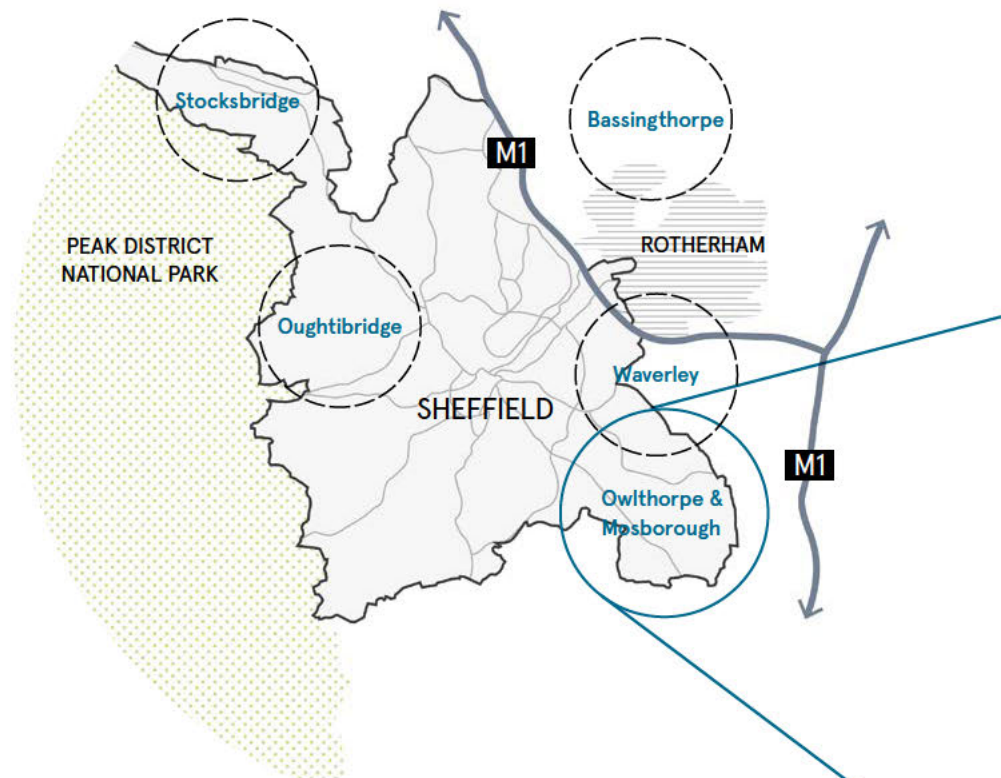
Having analysed the opportunities and constraints of the Council's boundary there are limited opportunities to provide new large scale urban extensions or new settlements, as can be seen on the Councils SHLAA plan.

Given the majority of land outside the main built up area is either located within the Green Belt or constrained by other policies or physical features, there is a small number of sites that can deliver new homes. The plan acknowledges that Green Belt land will need to be released and whilst no detailed assessments have been made, there are clear areas where the purposes of the Green Belt would be compromised, notably to the west where the cities of Rotherham and Sheffield should not merge.

To the north and east the M1 motorway provides a significant barrier to development and to the west of the city topography limits opportunities for sites over 200 homes.

### Sheffield's Options for Long Term Urban Growth

In 2016 Sheffield City Council commissioned a study to identify options for long-term urban growth for the City, a potential location for a 'Sheffield Garden City?'. The above map shows a series of potential 'confident bites' out of the Green Belt around Sheffield which the study identified are areas where "development at sufficient scale to create sustainable new and expanded neighbourhoods" could potentially be delivered. These areas include Stocksbridge, Oughtibridge, Basingthorpe, Waverley, Owlthorpe and Mosborough.



### The Opportunity at Mosborough

The 1960's masterplan for Mosborough envisaged a much more extensive urban expansion that has been realised to date. Therefore, we have an opportunity to more fully complete the urban extension. At the time this area was conceived as being an exemplar development for suburban living. Going forwards, the completion of Mosborough can be delivered as a modern exemplar of sustainable development, planning and design.

### Competing Sites in Mosborough

The map opposite identifies the sites shown in the SHLAA where large scale urban extensions could potentially be developed, including Owlthorpe and Mosborough.

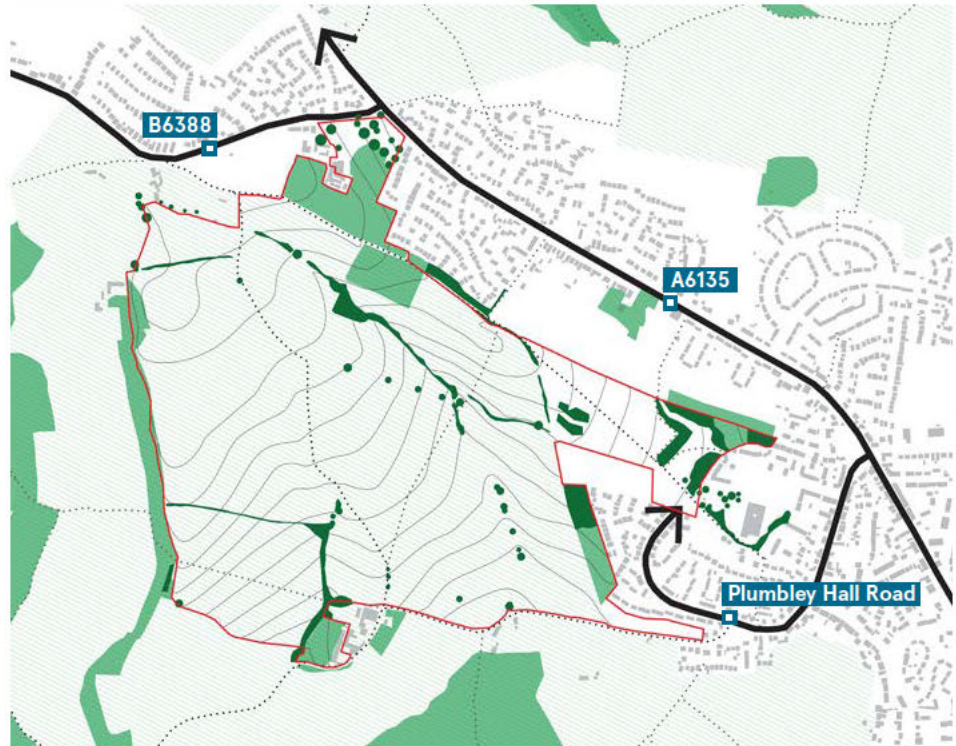


## 4 WHY MOSBOROUGH?

*Development at a large scale such as urban extensions will almost always include land with the Green Belt. The site at Mosborough is no different, however, it has all the attributes of a site that could deliver a sustainable urban extension.*

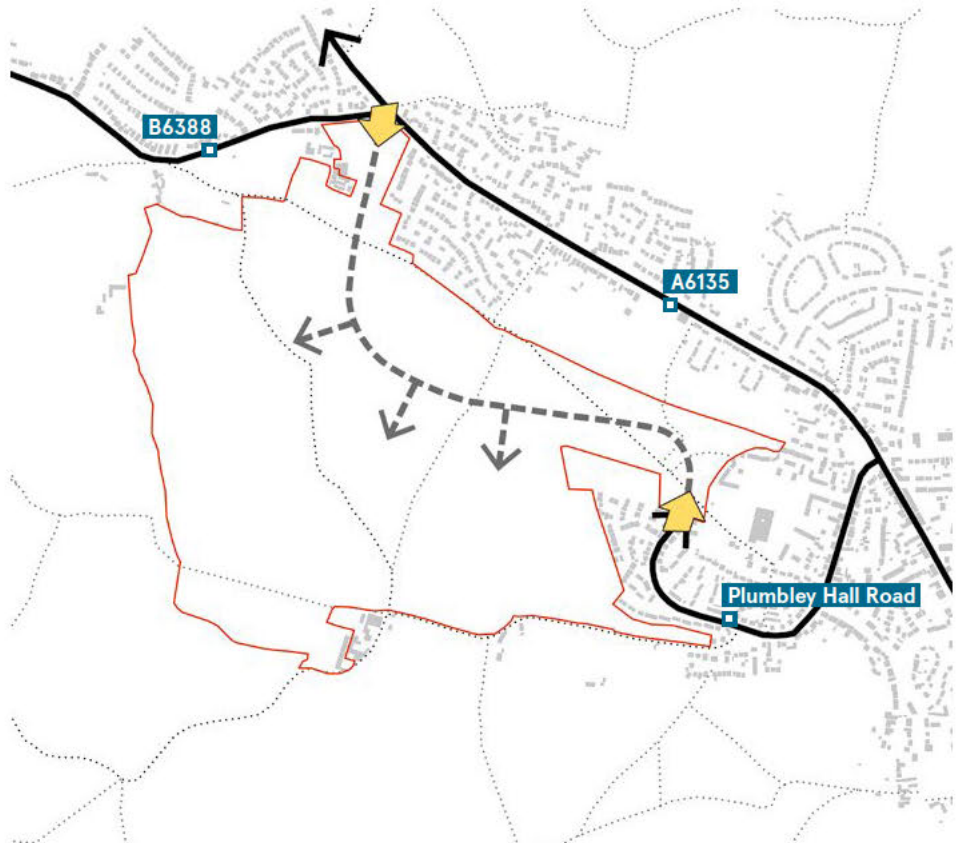
### LANDSCAPE

- Little visual intrusion to existing built form as site slopes away from adjacent neighbourhood.
- Site well protected visually by existing surrounding woodland and valley form.
- The majority of the site is within Green Belt.



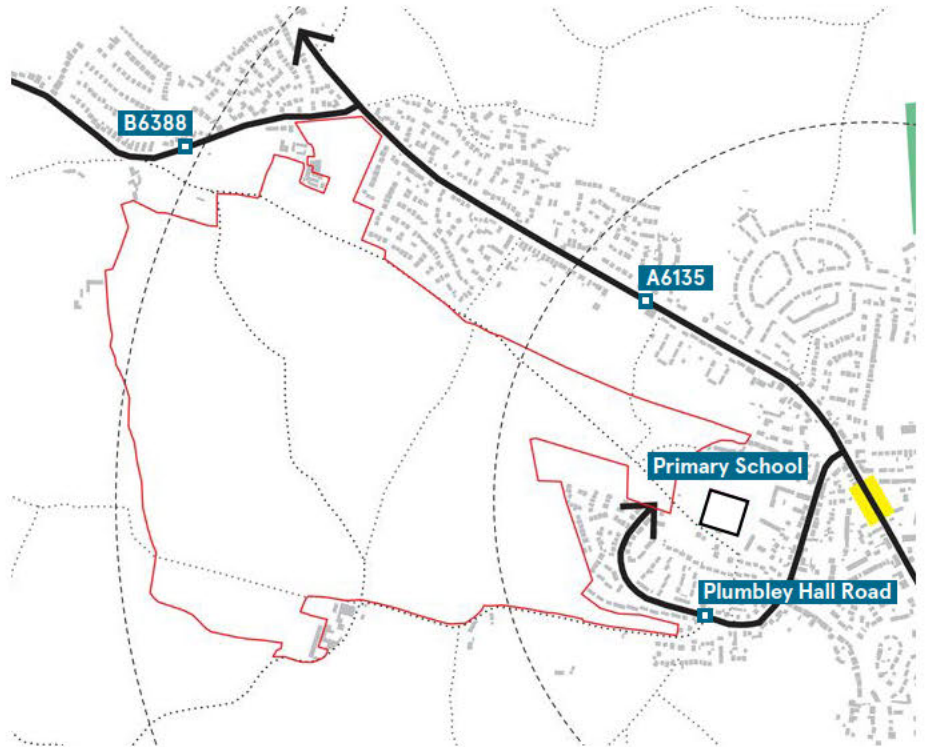
### ACCESS

- Existing site access on the eastern boundary (Plumbley Hall Road)
- Potential secondary access point at junction of B6388 and A6135.
- Potential connections throughout the site and further afield via the extensive Rights of Way (Bridleways and Footpaths).



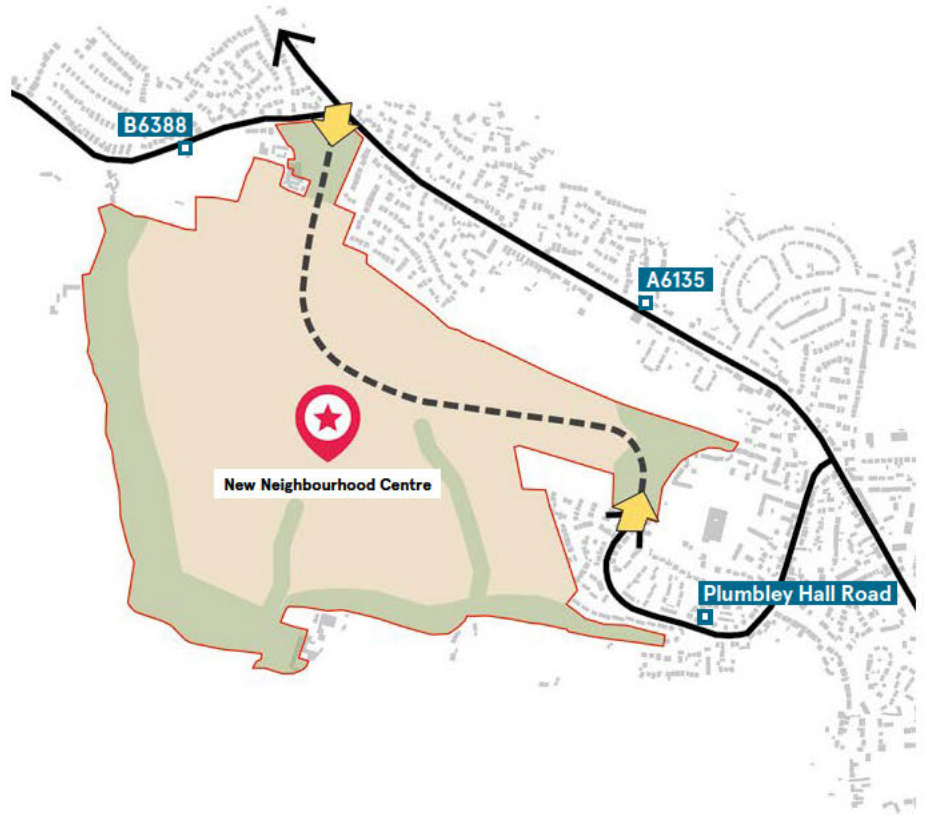
## COMMUNITY INFRASTRUCTURE

- Portion of the site falls within 800m (10 minute walk) of the Mosborough Primary School and the local centre, which consists of dentist, convenience stores, barbers and takeaways.
- Existing sports facilities to the north east of the site, including rugby/football pitches and athletics track.
- Good connections to the wider area from the B6388 and A6135.
- Full site development would justify a new or series of neighbourhood / local centres.



## CAPACITY FOR GROWTH

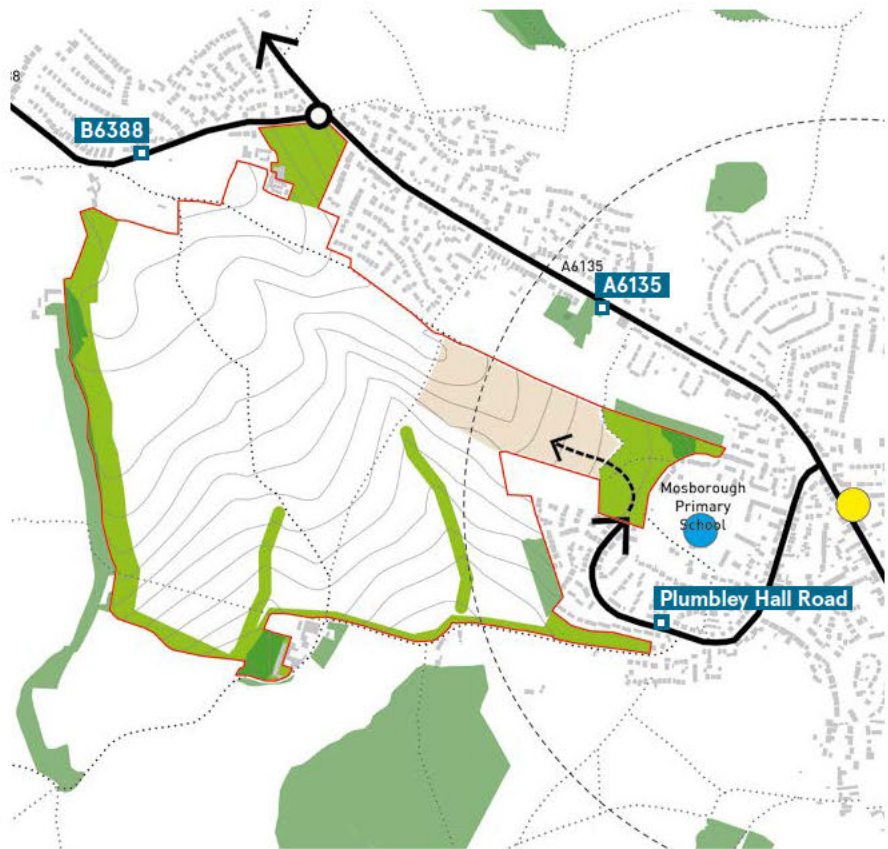
- Potential for site to accommodate upto 2,000 new homes.
- Potential new local centre at the heart of the site to provide new school, convenience store, medical centre and post office.
- Providing new formal and informal connections to the immediate wider area and local neighbourhood.



## 5 DEVELOPMENT OPTIONS

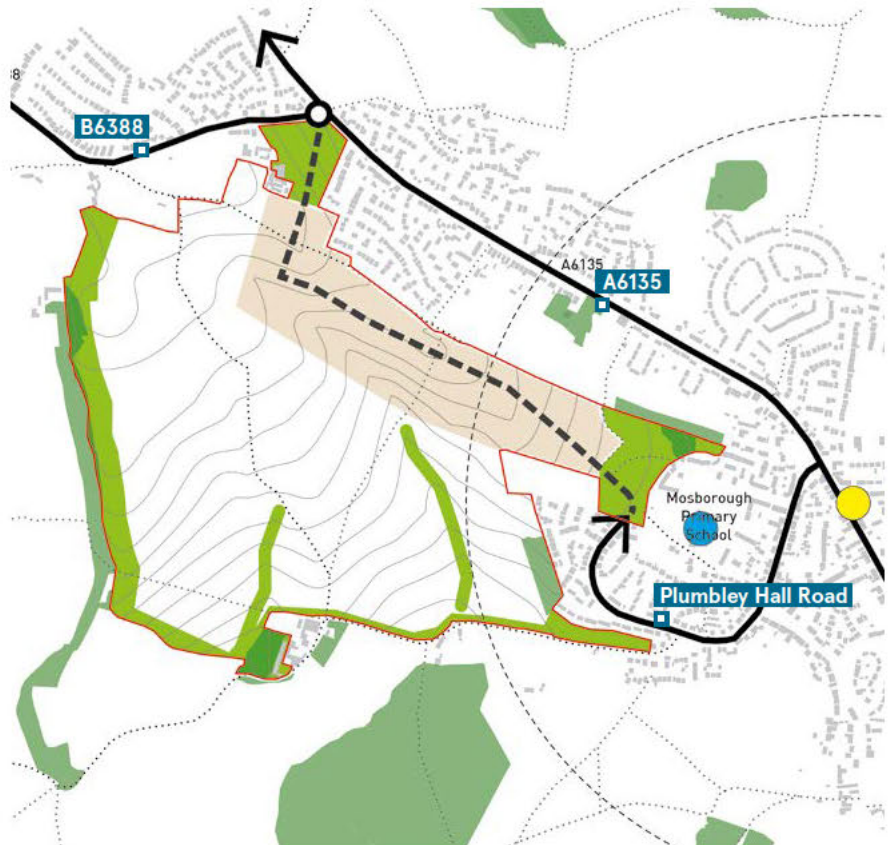
### OPTION 1 - c.200 HOMES

- c. 5.7ha of development land.
- One new additional access point from north western boundary.
- Within 800m (10min walk) of local centre and Mosborough Primary School.



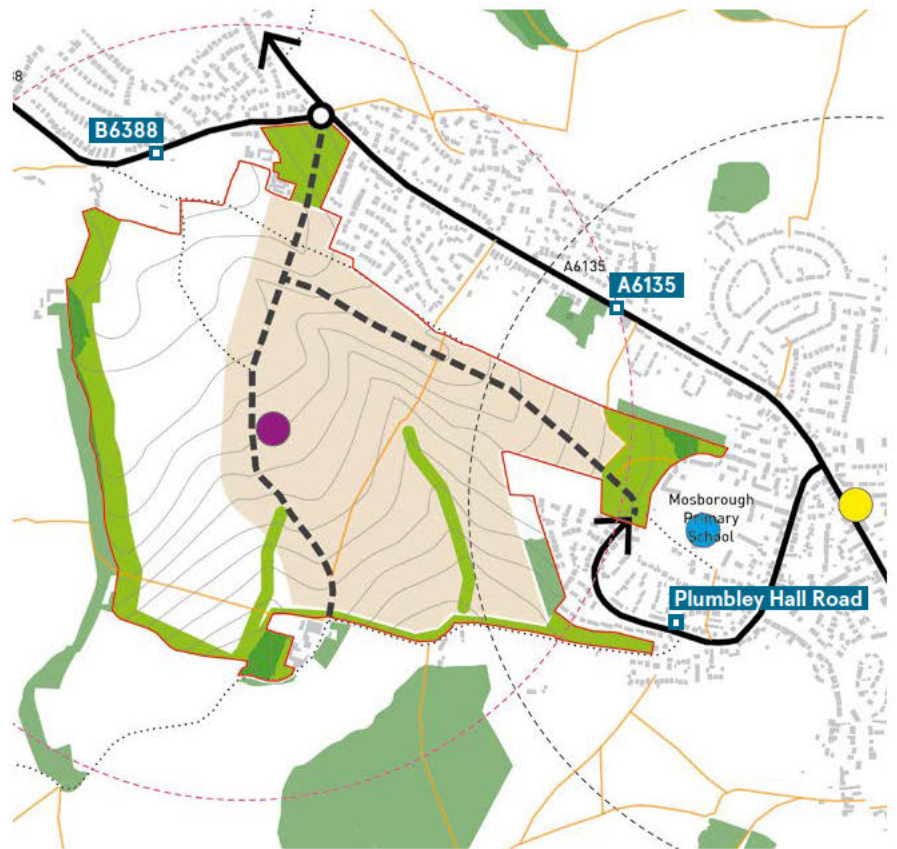
### OPTION 2 - c.500 HOMES

- c. 14.2ha of development land.
- One new additional access point from north western boundary.
- Majority of development outside 800m (10min walk) of local centre and Mosborough Primary School. May potentially require new school.



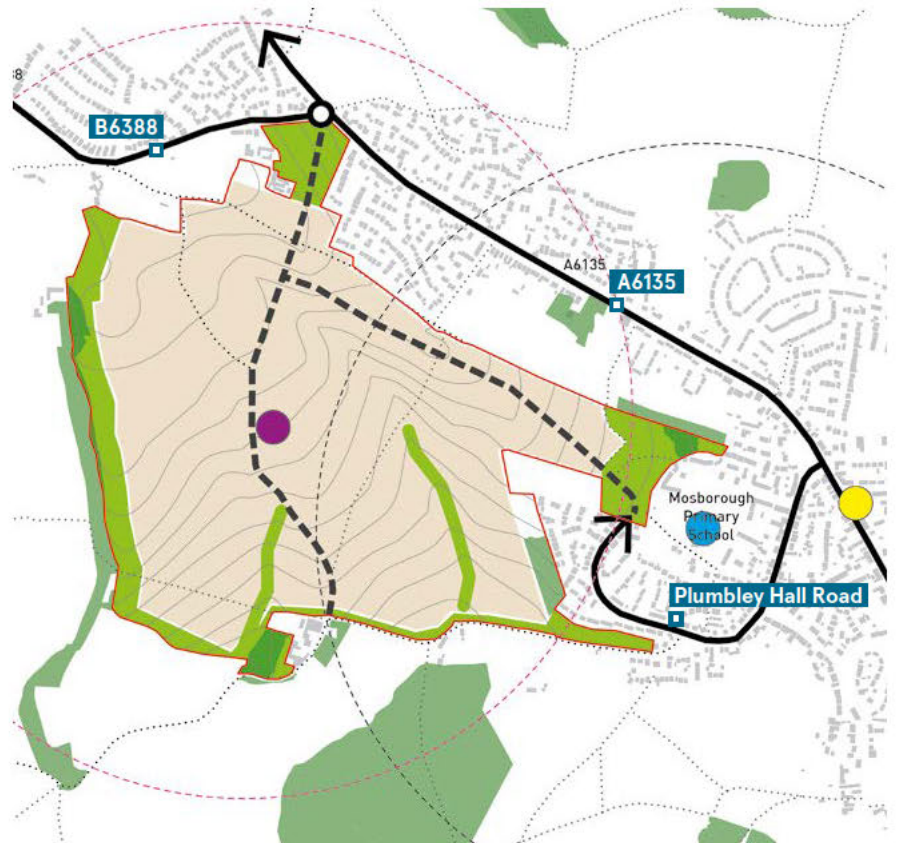
### OPTION 3 - c.1,250 HOMES

- c. 34.7ha of development land.
- Two new additional access point from north western and southern boundary.
- Would require new school to accommodate new development.
- Would potentially require new local centre to accommodate new development.
- New local centre would potentially consist of medical centre, post office and convenience store.



### OPTION 4 - c.2,000 HOMES

- c. 57.1ha of development land.
- Two new additional access point from north western and southern boundary.
- Would require new school to accommodate new development.
- Would require new local centre to accommodate new development.
- New local centre would potentially consist of medical centre, post office and convenience store.



## 6 BENEFITS

*The proposals will provide a variety of social, economic and environmental benefits, benefiting both the existing and proposed communities in the area.*



**High-quality living environment and new homes:** high-quality development that can deliver up to 2,000 new dwellings.



**Best Practice:** attractive development that is based upon best practice design principles to create a safe, active place that has its own identity.



**Accessibility and sustainability:** development that is designed to be well connected, accessible and walkable to key facilities and services – supported by safe, attractive routes that are overlooked.



**Public open space and landscaping:** enhancing links to the West Pennine Moors and the provision of a country park with significant areas of enhanced biodiversity.

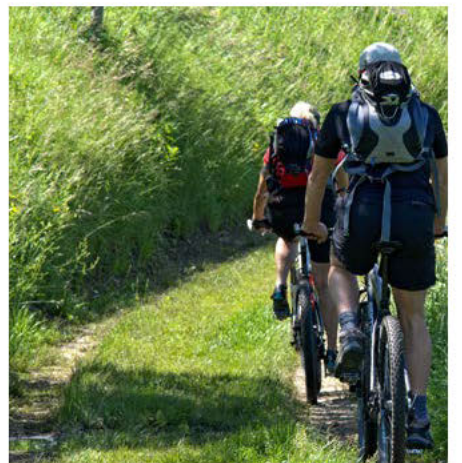
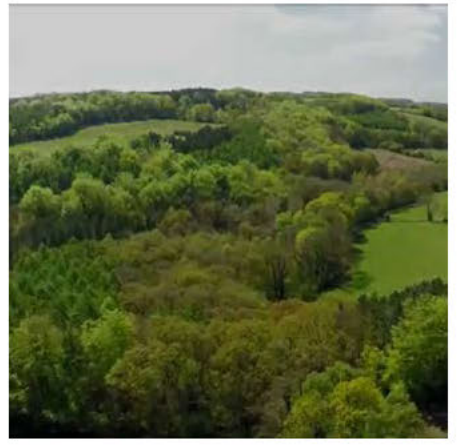
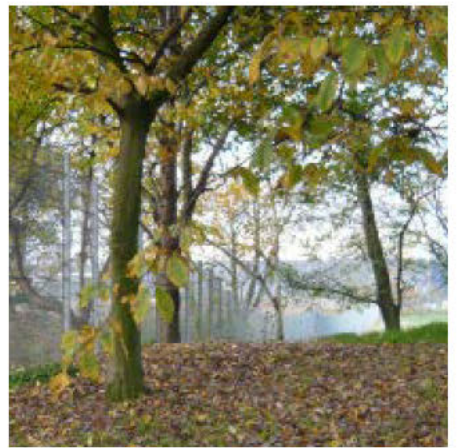
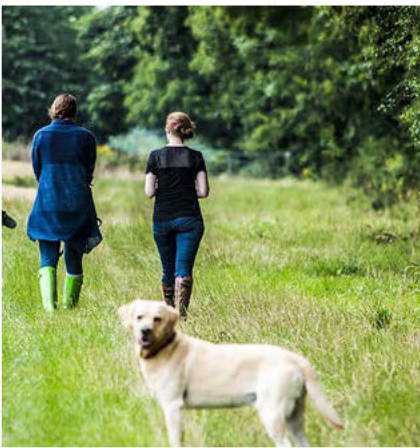


**Variety of new housing for local residents:** Affordable housing in line with the Development Plan – the details of which will be carefully considered in liaison with the Council as the masterplan evolves subject to need.



**Responsive design to local context:** A development that considers and responds to existing Site features and assets, utilising landscape setting and topography.





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**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** FW: 33129 - Mosborough Barratt David Wilson Homes Written Representations  
**Date:** 30 May 2023 10:42:00  
**Attachments:** [image001.png](#)  
[33129.A3.MW.MosboroughSheffield Reqs.UPDATED.27.04.FINAL.230215.pdf](#)  
[33129.A3.MW.MosboroughSheffield Reqs FINAL.230215.pdf](#)

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Hi [REDACTED],

Just to let you know this email to the Sheffield Plan mailbox is for PDSP.020.

You'll notice I've put the email in the respondent folder. Please could you add the 'UPDATED 27.04.FINAL' PDF as document 'E', along with their email on 27.04.23 as a pdf. We need to log the updated document as well as the original.

Thanks,

[REDACTED]

---

**From:** SheffieldPlan  
**Sent:** Friday, May 26, 2023 4:37 PM  
**To:** [REDACTED]  
**Subject:** FW: 33129 - Mosborough Barratt David Wilson Homes Written Representations

Hi [REDACTED],

Could you try and match this email to the original response and let me know the original response ID/new respondent ID?

I'd suggest you use the main comments spreadsheet and search for Barratt and David Wilson Homes.

Thanks,

[REDACTED]

---

**From:** Whelan, Maeve [REDACTED] >  
**Sent:** Thursday, April 27, 2023 12:44 PM  
**To:** SheffieldPlan <[sheffieldplan@sheffield.gov.uk](mailto:sheffieldplan@sheffield.gov.uk)>  
**Subject:** 33129 - Mosborough Barratt David Wilson Homes Written Representations

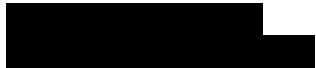
To Whom it May Concern,

We previously submitted representations to the Draft Sheffield Local Plan for Mosborough, on behalf of Barratt and David Wilson Homes in February (attached to this email for ease of reference).

We have an updated version of the vision document which was submitted with the reps at the end of the document which we are sending on now to ensure accuracy (attached to this email as UPDATED27.04 copy). To clarify we are not resubmitting reps which remain exactly the same in the updated doc.

Regards,

**Maeve Whelan**  
Graduate Planner



Stantec  
First Floor, 14 King Street  
Leeds LS1 2HL



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