

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: Gladman Reg. 19 Representation Submission
Date: 20 February 2023 09:25:33
Attachments: [Sheffield Plan Reg. 19 Gladman Letter.pdf](#)

Good morning,

Please find attached Gladman's representations submitted as part of the Regulation 19 consultation. I hope the Council find the comments useful. I would be grateful if you could confirm receipt of this submission.

Kind regards,

Victoria

Victoria Demetriou-Smith

Senior Planner

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20th February 2023

BY EMAIL ONLY

Dear Strategic Planning Team,

RE: Sheffield Local Plan Regulation 19 Consultation Submission

I am writing on behalf of Gladman Developments Ltd (Gladman) in response to the Regulation 19 consultation on the Sheffield Plan. Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in contributing to the development plan preparation process having made representations on numerous planning documents throughout the UK. We welcome the opportunity to comment on the Sheffield Plan.

Policy SP1: Overall Growth Plan

This policy states that the Plan will deliver 35,530 new homes by 2039 and suggests that it will allocate 297 sites for housing. The NPPF (2021) determines that the minimum number of homes needed should be informed by a local housing need assessment conducted using the standard method. Using the standard methodology outlined in the PPG, and adding the 35% Cities and Urban Centres Uplift, Sheffield's local housing need is 3,032 dwellings. This is significantly higher than the 2,090 dwellings per annum the Plan currently plans for.

The justification for this lower housing growth figure is that it reflects the capacity of the existing urban areas and the restrictions imposed by the Green Belt. Gladman are concerned that the proposed housing requirement is not sufficient to meet the local housing need as identified by the standard method, and that the implications this could impact economic growth and affordable housing provision in the area. Gladman consider that further due consideration should have been given to greenfield and Green Belt sites in sustainable locations to help meet the local housing need. Whilst it is recognised that the 35% uplift will be met in the urban area, it does not prevent these needs being met elsewhere in line with the Government's target of 300,000 homes per year to address the housing crisis.



Policy H1: Scale and Supply of New Housing

This policy states that homes will be delivered in line with Policy SP1 and SP2 and will be focused on previously developed land within urban areas. The target for homes delivered on previously developed land is 85% across the period 2022-2039.

Though Gladman generally support the use of previously developed land, this can have significant implications on the delivery of affordable housing. There are high affordable housing needs in Sheffield; 902 dwellings per annum equating to 43% of the proposed housing requirement. Consequently, it must be recognised that the higher up-front cost of re-developing brownfield sites can impact viability and reduce affordable housing delivery on site and the Council must consider whether this strategy is the most appropriate for meeting the very real and pressing housing needs of the city. A strategy that allocates greenfield sites would be more likely to contribute to the meeting of affordable housing need whilst delivering much needed market homes.

Policy NC3: Provision of Affordable Housing

In line with the above, Gladman do not consider the affordable housing policy to be consistent with national policy. The policy states that affordable housing will be required on developments of more than 10 dwellings at a rate of 10%-30% dependent on the affordable housing market area. It also sets the affordable housing tenure mix, which is states should be 25% First Homes, 25% social rent or equivalent affordable tenures and 50% affordable rent or housing for intermediate or equivalent affordable tenures.

Though the delivery of affordable housing is supported, the NPPF states that the derivation of affordable housing policies must not only take account of need, viability, and deliverability. If the baseline aspiration of the policy is too high, negotiation can be time-consuming and impact the timely delivery of sites. The policy should be considerate of this and also mindful of the minimum requirement of 10% affordable housing as per the NPPF.

Conclusion

Gladman welcome the opportunity to comment on the Sheffield Plan and have outlined the concerns regarding the housing requirement, spatial strategy and affordable housing delivery contained within the draft Sheffield Plan. I trust that the Council will find these comments useful as it continues to progress its Local Plan.

Yours faithfully,

Victoria Demetriou-Smith

Senior Planner

