

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

Respondent details

Comment ID number: PDSP.066.002

What is your Name: jimlomas66

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

DLP Planning Limited

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

Mr T Kelsey - Landowner of Moorview Golf Driving Range

Document

Which document to you wish to make a representation on:

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

Which section of the document is your representation on:

Chapter 1: Introduction

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

N/A

Representation

Do you consider the Local Plan is legally compliant: No

Do you consider the Local Plan is sound: No

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

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

please see supporting report provided under separate cover

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

Please see supporting report provided under separate cover

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

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

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

To fully outline and present a case on behalf of the landowner and outline measures to be introduced in order to remedy the issues highlighted

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

Respondent details

Comment ID number: PDSP.066.010

What is your Name: jimlomas66

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

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Mr T Kelsey - Landowner of Moorview Golf Driving Range

Document

Which document to you wish to make a representation on:

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

Which section of the document is your representation on:

Chapter 2: Vision, Aims, and Objectives

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

N/A

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Comment ID number: PDSP.066.017

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DLP Planning Limited

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

Mr T Kelsey - Landowner of Moorview Golf Driving Range

Document

Which document to you wish to make a representation on:

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

Which section of the document is your representation on:

Chapter 3: Growth Plan and Spatial Strategy

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

N/A

Representation

Do you consider the Local Plan is legally compliant: No

Do you consider the Local Plan is sound: No

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

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

Respondent details

Comment ID number: PDSP.066.018

What is your Name: jimlomas66

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

DLP Planning Limited

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

Mr T Kelsey - Landowner of Moorview Golf Driving Range

Document

Which document to you wish to make a representation on:

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

Which section of the document is your representation on:

Policy SP1: Overall Growth Plan

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

N/A

Representation

Do you consider the Local Plan is legally compliant: No

Do you consider the Local Plan is sound: No

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

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

Respondent details

Comment ID number: PDSP.066.023

What is your Name: jimlomas66

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DLP Planning Limited

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

Mr T Kelsey - Landowner of Moorview Golf Driving Range

Document

Which document to you wish to make a representation on:

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

Which section of the document is your representation on:

Policy SP2: Spatial Strategy

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

N/A

Representation

Do you consider the Local Plan is legally compliant: No

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

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

Respondent details

Comment ID number: PDSP.066.024

What is your Name: jimlomas66

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

DLP Planning Limited

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

Mr T Kelsey - Landowner of Moorview Golf Driving Range

Document

Which document to you wish to make a representation on:

Policies Map

Which section of the document is your representation on:

N/A

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

Green Belt

Representation

Do you consider the Local Plan is legally compliant: No

Do you consider the Local Plan is sound: No

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

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

Respondent details

Comment ID number: PDSP.066.026

What is your Name: jimlomas66

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

DLP Planning Limited

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

Mr T Kelsey - Landowner of Moorview Golf Driving Range

Document

Which document to you wish to make a representation on:

Integrated Impact Assessment

Which section of the document is your representation on:

N/A

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

N/A

Representation

Do you consider the Local Plan is legally compliant: No

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

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

Please see supporting statement provided under separate cover

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From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: Local Plan - Reg 19 Consultation
Date: 20 February 2023 14:36:17
Attachments: [image001.png](#)
[YK6667P Kelsey - Driving Range - Reg 19 Submission.pdf](#)

Our Ref YK6667P. JL.20.02.23

Dear Sir/Madam,

**Re: Regulation 19 Local Plan Consultation
Site at Moor View Golf Driving Range
Bradway Road, Sheffield
For Mr T Kelsey**

With reference to the above mentioned public consultation exercise, I hereby attach a supporting report on behalf of Mr T Kelsey seeking a number of changes and posing questions relating to several aspects of the emerging Local Plan.

The formal online representation has been completed outlining the areas of dispute.

This supporting report builds in the submission made and outlines the position taken on behalf of the landowner.

As ever, if there are any further questions, please do not hesitate to contact me.

Kind Regards,

Jim

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For and on behalf of
Mr T Kelsey
Moor View Golf Driving Range
Bradway Road
Bradway
Sheffield

Sheffield Local Plan
Regulation 19 Consultation

Objections to Reg 19 Local Plan Consultation
and Integrated Impact Assessment Report

Prepared by
DLP Planning Ltd
Sheffield

February 2023





Insert Job Number & Site Name
Insert Client Name
Insert Name of Document
Insert Month & Year

Prepared by:	Jim Lomas BA (Hons) MRTI
Checked by:	
Approved by:	
Date: February 2023	Office: Sheffield

DLP Planning Limited

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Insert Job Number & Site Name
Insert Client Name
Insert Name of Document
Insert Month & Year

1.0 BACKGROUND.

1.1 The representation to the Sheffield Local Plan – Regulation 19 Consultation has been made on behalf of Mr T Kelsey, owner of Moor View Golf Driving Range, Bradway Road, Bradway, Sheffield.

1.2 **Objection to Policies SP1 (parts a) c) and h) and SP2 and Omission Sites**

1.3 This submission forms part of our objection to policies SP1 (parts a, c and h) and SP2 as it demonstrates, by example, how a higher level of housing provision can be achieved by the allocation of additional Greenfield and Green Belt sites. It goes onto demonstrate that the development of sites, such as the one that forms part of this objection, will deliver far greater benefits when compared to the limited harm, including harm to the green belt function that would result from this development. This site will make a significant contribution to meeting housing needs and in particular the provision of family and affordable housing which will not be met by the strategy as set out on Policies SP1 and SP2. This objection demonstrates that when undertaking the judgement of benefits and harm it is necessary to consider the actual site that is being proposed (including possible mitigation) rather than relying on more generic assessments of larger areas and ignoring possible mitigation measures

1.4 The representation relates to the continued inclusion of the Moor View Driving Range within the proposed Green Belt in the emerging Sheffield Local Plan

1.5 It is considered that the parcel of land should be reallocated as a Housing Site in order to meet:

- Strategic housing needs within the City over the Plan period.
- Deliver a share of affordable housing with the South Western Sector of the City.
- Utilise sustainable urban land for much needed housing with in the City.
- Ensure continued economic growth with the City through the provision of housing.
- Utilise land which does not serve any of the purposes of the Green Belt
- Offer accessible land with an adopted access to the local highway network.
- Build housing with a Flood Zone 1 to avoid risk of fluvial flooding.
- Develop housing within an area devoid an any significant ecological value'
- Introduce a compatible land use with surrounding housing development
- Reduce current impacts o light pollution on the surrounding area
- Develop on land which is part brownfield and used for caravan storage, driving range, and bar facility

1.6 The objections to the emerging Local Plan need to be read in conjunction with representation a submitted by DLP Planning Limited for a wide range of policies, approaches and strategy proposed within the Regulation 19 submission.

1.7 This statement will comment on the following matters and supporting evidence:

- The Draft Regulation 19 Plan and policies
- The IIA

The Site

- 1.8 The subject site is located within the main urban area of Sheffield within the community of Bradway.
- 1.9 The site forms a regular shaped parcel of land over 4 hectares.
- 1.10 The site comprises of a gold driving range, associated shelters, car parking areas, open caravan storage, bar and leisure facilities, flood lighting and a range of ancillary features within the overall landholding.
- 1.11 The site is access direct from Bradway Road and lies immediately adjacent to a public transport route.
- 1.12 The site is located within a Flood Zone 1 and is predominantly greenfield in nature
- 1.13 The site gently slopes down from north to south and is bound by residential properties to the south and east. To the west lies a large are of public open space and the north the land falls away steeply and is covered in woodland.
- 1.14 Bradway is considered to represent a sustainable urban area of the City offering a diverse range of amenities and services. These include:
 - Sainsburys Local shop
 - Petrol Filling Station
 - Hot food Takeaways (x 2)
 - Local parade of shops (Cafe/Hairdressers/Charity shop/Dog grooming/Butchers/Travel Agents/gift shop/clothes shop/pet food shop)
 - Community Centres (x 2)
 - Public House
 - Place of worship
 - Primary school
 - Playing fields (x 2)
 - Regular bus services
 - Garage/vehicle repair centre
- 1.15 The site is within single ownership and capable of coming forward for housing development
- 1.16 There are no known constraints, other than Green Belt policy, to prevent the land coming forward for housing development.
- 1.17 There is considerable developer interest in the site, although the Landowner has chosen to promote the land independently as opposed to jointly promoting with a housebuilder/developer.
- 1.18 The site benefits from a means vehicular access and studies have been undertaken which demonstrate an adopted access can be achieved without the need for third party land. Access arrangements are suitable in terms of both the horizontal and vertical alignments.

1.19 The site is illustrated on the ariel photograph below:



Photograph 1 – Ariel View of the submission site

2.0 INTRODUCTION

The following represents our objections to the Regulation 19 Consultation Local Plan for Sheffield

- a) Paragraph 1.1
- 2.1 It is not considered that the Sheffield Plan sets out a strategy for future growth and change through to 2039 for reason explained in our other objections (notably SP1 and the site specific objections) the plan simply does not set out the strategy for change as the strategy is reliant upon the delivery of sites that are unviable and sites that have not been allocated (i.e. unidentified sites in the Broad Areas of growth).
- 2.2 It is also challenged that the plan will help to deliver Sheffield City Council's objectives for creating a fairer city for everyone as there are clearly sectors for the population that are will be considerably disadvantaged by the strategy these are young people especially those wishing to enter into home ownership and/or start a family. This is because as will be demonstrated in our objection to policy SP1 the strategy fails to deliver the levels of family housing required to meet need.
- 2.3 The strategy also fails to deliver age appropriate housing, especially extra care market housing for which there is a demonstrable shortfall within the city and which would assist in release much needed family accommodation.
- 2.4 This makes the plan unsound as it fails to address these needs as required by NPPF paragraph 62.
- b) Paragraph 1.35
- 2.5 The statement that the Plan is in accordance with the NPPF is seriously misleading to the public. The Council are building an expectation that they have fully conformed to the Guidance, but this is not factually correct.
- 2.6 Paragraph 61 of the NPPF requires that strategic policies should be informed by a local housing need assessment, conducted using the Standard Method in national planning guidance – unless exceptional circumstances justify an alternative approach. Although not referred to in the Plan at all the strategy neither meets the level of housing required by the Standard Method or (because it is completely silent on the issue) sets out any exceptional circumstances to justify an alternative approach.
- 2.7 Furthermore the plan is contrary to NPPF Paragraph 26 because having failed to meet the housing requirement as set by the Standard Method they have then failed to undertake the next step which is engage with other local authorities to see if this need can be meet elsewhere. Instead it states (incorrectly) that it does not require other Councils to assist in meeting its needs (LP Paragraph 3.7).

3.0 OBJECTION TO SECTION 2 VISION, AIMS, AND OBJECTIVES.

a) Paragraph 2.2

3.1 While the Councils vision maybe that by 2039, Sheffield should be economically stronger, fairer, more inclusive and sustainable city this will unfortunately not be the case as older persons seeking age appropriate housing and younger people seeking home ownership and family housing will be significant disadvantaged. The reasons for this is not only the lack of choice of locations, type and tenure of development but also the fact that many allocated sites are unviable and undeliverable.

3.2 There are undoubtedly some very strong economic indicators for Sheffield which could if planned for could result in the City playing a nationally significant economic role at the heart of its region, but the Councils approach to housing will certainly not result in thriving neighbourhoods and communities, and the urban and rural identities will be eroded by increased densities required to achieve even the low number of dwellings being delivered by the policy.

b) Paragraph 2.12

3.3 The implications of the strategy which is to export those seeking to own their own family home is unlikely to close the gap between the poorest and the wealthiest areas of the city. The lack of suitable level of family housing the exportation of those seeking such housing out of the city is likely to actually increase the gap as there will be a divergence of the wealthiest and poorest areas. This is not supported by the evidence and is unsound.

3.4 The require to Sheffield to achieve zero carbon by 2030 is simply beyond the capability of this land use plan. It is also unevidenced as how this will be achieved or how it will be measured. In particular the reliance on the existing housing stock means that poor performing buildings will be in continuous occupation and the opportunities for this stock to be upgraded when it is sold on diminishes. This is unevidenced and therefore unsound.

3.5 Despite the objective the strategy will not create a housing market that works for everyone and will not provide choice or affordability. The strategy is strongly focused on providing one type of accommodation (apartments and Student accommodation) in a single location (the city centre and its immediate environs) is completely contrary to the evidence available of both the location and type of accommodation.

3.6 In addition the provision of student accommodation and apartment schemes, recent experience in the city, is that the strategy will only deliver dwellings for rent therefore not only will the need for family housing go unmet and the strategy will drive down homeownership and the benefits associated with that tenure will be unavailable to many future residents within the city.

3.7 While the objective is that there should be an adequate supply of housing to meet its requirement this is factually incorrect. The requirement as set by the NPPF and the Standard Method is not being met and the Council do not claim that there are exceptional circumstances for not doing so.

- 3.8 The analysis set out in our objection to SP1 and NC3 demonstrate not only has the delivery of affordable housing in Sheffield been extremely poor but that, given the unavailability of a significant number of the proposed allocations that even on the Council's own evidence this poor level of provision will endure throughout the whole plan period.
- 3.9 The objective to locate development in locations that minimize the need to travel is not going to be met by the present strategy. The lack of family housing means that many young people wishing to start families are moving beyond the city boundary and then commuting back in. Therefore while the strategy concentrates new housing around the city centre the known consequence of this strategy is actually to increase commuting distances for those who seek family housing.

4.0 OBJECTION TO SECTION 3 GROWTH PLAN AND SPATIAL STRATEGY

a) Paragraph 3.1

4.1 For the reasons set out in our **objection to SP1** a and b the plan does not deliver sufficient to meet the needs of the city because 1) the level being planned for is not the housing requirement 2) the plan does not actually identify the sites to meet even its lower requirement the plan only allocates some 10,319 units in the Central Sub area and just 4,494 in the other sub-areas and is reliant upon 3,400 units to come forward on small sites and a further 4,675 units to be delivered on large windfall sites (SHELAA table 19). This means that 35% of the plan's housing delivery is on unidentified sites (8075/22,888).

4.2 This is despite the fact that there are sufficient sites to meet both the level of housing set in the plan and indeed the Standard Method.

4.3 This is not planning positively as required by the NPPF and as such is unsound.

b) Paragraph 3.3

4.4 The claim the Central Sub-Area is the most accessible location in the city is somewhat misleading as the Central Sub-Area is transacted by major roads and the River Don which limit movements especially pedestrian movements within the Sub Area. Just as importantly not all of the major employment locations are within the Sub Area so it does not represent the only focus of exiting or future job creation.

c) Paragraph 3.4

4.5 For the reasons set out in more detail in our objection to SP1 Sheffield's development needs to 2039 cannot be met within the existing urban areas and will require sites to be removed land from the Green Belt. The housing requirement as set by the Standard Method is according to the Housing Economic Growth and Demographic Modelling (July 2021 some 2,923 dpa requiring some 49,691 dwellings within the plan period (table 9.1). This requirement is the housing requirement for the city as it has not been challenged and no exceptional circumstances have been demonstrated.

4.6 This statement is unsound as the housing requirement is factually incorrect and presenting it in this way without any justification is misleading to the public.

4.7 Furthermore, as set out in our objections to SP1 and the site allocations it is our opinion that 1) the Local Plan simply doesn't allocate the land to meet even this lower stated level of housing (it is at least 4,750 units short of meeting this figure) and 2) the allocations that have been made many are on the Councils own evidence unviable and in our view undeliverable.

4.8 The consequence of these findings are that even to meet the Councils own lower housing figure there will be a need to release land from the Green Belt and this need increases if the minimum level of housing need set by the Standard Method is to be achieved.

4.9 It should be noted that because the Council determined as part of the plan making process that Green Belt sites should not be identified a significant number of sites which would otherwise be suitable and deliverable have been omitted from their assessment.

4.10 The evidence to support this is in September 2020, the Sheffield Plan Issues and Options document which presented all three options as requiring the reuse of previously developed sites and in addition options 2 and 3 suggest Green Belt release. This was to accommodate only 2,200 dpa.

4.11 Green Belt Review 2020 did not conclude that the only site that could be removed from the Green Belt and brought forward for development was Norton Aerodrome (Policy SA6) but in fact concluded:

“9.1 The Green Belt Review demonstrates that all land within Sheffield’s Green Belt performs Green Belt functions to some degree. Some areas perform more strongly against Green Belt purposes than others.”

4.12 In addition, the Integrated Impact Assessment Report (December 2022) (table 6.1) considered three different options to meeting the 40,000 figure. This included option 3 which incorporated an assessment of a number of Green Belt sites for strategic (1,000 dwelling plus). The summary in table 6.1 does not reach the conclusion that release of strategic Green Belt sites should be ruled out as a matter of course as table 7.1 includes number of strategic Green Belt sites. In paragraph 7.5.13 the IIA concludes in that it has explored in detail a range of Green Belt locations that could potentially be reasonable for more detailed investigation for housing development should the need arise in Sheffield. Table 9.1 (page 51) demonstrates that sites could be identified to meet a total of 52,580 dwellings in the plan period which would require the release of some 11,990 dwellings from the green belt.

d) Paragraph 3.6

4.13 The statement that the release of Green Belt land would potentially jeopardise the regeneration of brownfield land is not supported by any evidence and if this is the justification for the approach adopted then the approach is unsound.

4.14 The available evidence in the Whole Plan Viability Tables 10.2a to 10.2f and appendix 18 clearly demonstrate that it is not competition from green field sites that is preventing these sites from coming forward but that there are systemic viability issues with these sites, a situation made worse by the existing CIL requirement and the proposed affordable housing requirements which render all brownfield sites in the following sub areas unviable:

- City Centre,
- East and Northeast,
- Manor / Arbourthorne / Gleadless,
- Urban West. Stocksbridge / Deepcar,
- Rural Upper Don Valley, Chapelton / Ecclesfield

4.15 The Whole plan viability report states:

“10.12 Development in the Central Area, when assessed under the methodology set out in the PPG is shown as unviable”.

4.16 It goes onto state that this also applies to greenfield development in certain locations as follows:

“10.43 In these areas (City Centre and East, Northeast, Manor/Arbourthorne/Gleadless), both brownfield and greenfield development is unviable, including at minimum policy scenario. The viability evidence suggests a zero affordable housing requirement”.

4.17 For the sub Area Urban West, Stocksbridge / Deepcar, Upper Rural Don Valley, Chapelton / Ecclesfield Area the Whole Plan Viability Report states:

“10.45 As in the City Centre, East and the North East, the viability evidence in Urban West, Stocksbridge / Deepcar, Upper Rural Don Valley and Chapelton / Ecclesfield Area shows that brownfield development is unviable, including at minimum policy scenario”.

10.46 The viability evidence suggests a zero affordable housing requirement”.

- 4.18 The suggestion that the release of greenfield land will compromise the delivery of unviable sites which cannot be considered to be deliverable in the context of the NPPF is both contrary to the evidence base of the plan and unsubstantiated.
- 4.19 As a justification for not releasing Green Belt sites the suggestion that there needs to be a restriction on green field release is not based on evidence and is unsound.
- e)** Paragraph 3.7
- 4.20 This states that Sheffield is not relying on other local authorities in the city region to meet any of its housing needs however if the city is not to be meet the housing requirement as defined by the Standard Method and have provided no exceptional circumstances to justify an alternative figure then the Council should have engaged the duty to cooperate as required by the NPPF paragraph 25 to 27. In particular paragraph 26 makes it explicit that:
- “In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.”*
- 4.21 In the circumstances of this local plan the Council have clearly failed to engage the Duty to Cooperate this is due to the incorrect approach that has been taken to the overall housing being planned for, as explained in paragraph 3.8 the level of housing provision has been determined by the capacity of the urban areas and the restrictions imposed by the green belt.
- 4.22 In these circumstances where the minimum level of housing as calculated by the Standard Method is not being met (NPPF paragraph 61) then the Council should have raised this issue as part of the Duty to Cooperate prior to the Regulation 19 stage. Failure to do so is a failure in the Councils legal duty under the Localism Act 2011, (as set out in section 33A of the Planning and Compulsory Purchase Act 2004) which places a legal duty on local planning authorities and county Councils in England, and prescribed public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan and marine plan preparation in the context of strategic cross boundary matters.
- 4.23 This is a legal failure and is of such a magnitude that it cannot be rectified by further engagement at this time after the regulation 19 stage the plan should be withdrawn or should be found unsound due to legal noncompliance.
- 4.24 The Duty to Cooperate (DtC), unlike soundness problems this cannot be remedied once the Plan has been submitted for examination. This is clear from the case of Samuel Smith Old Brewery (Tadcaster) v Selby DC [2015] EWCA Civ 1107 and in particular, paragraphs 38 and 40.
- f)** Paragraph 3.8
- 4.25 This paragraph explains the approach that the Council have taken to the preparation of the plan and clearly state that the level of housing has been set to reflect what may be accommodated within the existing confines of the city without reviewing the green belt.
- 4.26 In this paragraph nor anywhere else in the plan does the Council state that it is seeking challenge the overall level of housing need as calculated by the Standard Method on the grounds that there are exceptional circumstances.
- 4.27 If the Council are to take a capacity based approach, then there is a clear need to engage the Duty to Cooperate to accommodate unmet need and also demonstrate that they have investigated every possibility to accommodate the level of housing set by the Standard

Method.

- 4.28 It is noted that the surrounding authorities have in their local plans taken the difficult the decision to release Green Belt to meet their own housing and employment needs. It is clear that in order to meet any further unmet need from Sheffield will require these authorities to under plan reviews and release additional Green Belt land in their areas.
- 4.29 Not only would the engagement of the DtC require neighbouring authorities to release further green belt/ green field sites these would also be in locations which would be further away from the City and less integrated in the Cities public transport network. Such releases outside of the City would be contrary to Sheffield Local Plan aims as stated in paragraph 3.6 (also objected to) in that these solutions would lead to higher carbon emissions due to the increased need to travel.
- 4.30 The paragraph suggests that the level of housing proposed will support the City's growth ambitions as evidenced by the Housing, Economic Growth and Demographic Modelling and the Council's latest Employment Land Review, Employment Land Review Update, Logistics Study and Retail and Leisure Study. This is important in that the Council are not seeking to suggest that the evidence represents exceptional circumstances that justify a lower housing requirement (as required by NPPF paragraph 61) but merely that this lower level of provision will not thwart the Council's economic ambitions.
- 4.31 We note the approach adopted by the Inspector in the Welwyn and Hatfield Local Plan Examination (still ongoing) which also took a capacity based approach to housing provision. The Inspector in that case advised the Green Belt authority (EXAM178 Stage 6 Hearing Roundup Note 6 January 2020) that:
- “Unless there are sound planning reasons for not doing so, in the first instance, the totality of all of the dwellings assumed to be built during the plan period, on sites put forward in the adopted plan, must be capable of meeting, as a minimum, the FOAHN for at least the plan period.”*
- 4.32 In that case the inspector stated that:
- “There is a clear justification for the removal of some sites from the GB on the basis of overall housing need. However, that does not of itself justify the removal of specific individual sites. That should be based on a comparative assessment of all of the suitable and deliverable sites, considered to be available in the GB, as to their contribution to the purposes and openness of the GB and their relative sustainability in the context of the development strategy being promoted through the plan.”*
- 4.33 In the examination the inspector explained that before determining not to meet the housing need it was important “not to leave any stone unturned” and the inspector requested that the Council undertake further work to identify sites to meet the full housing need. These sites were identified and then examined by the inspector who found that a number would be sound allocations if included in the plan. The reluctance of the Council to allocate the additional sites identified by this process has resulted in the plan remaining at examination.
- 4.34 It is noticeable that Sheffield did not take this approach but determined unilaterally without reference to the finding ensure this the examination undertook a review of all Green Belt omission sites that had been submitted as art of the call for sites.
- 4.35 This approach is set out in more detail in the Report to Council 14 December 2022 section 1.6.
- 4.36 This approach of using Green Belt as a blanket restriction without reference to a thorough

review of the individual opportunities and for Green Belt release and balancing the harm caused by the release of the site (taking into account mitigation) and the benefits is contrary to the NPPF which does allow Green Belt release to meet housing need as this can represent exceptional circumstances (in terms of local plan review) as well as Very Special Circumstances (in terms of determining applications and appeals).

- 4.37 NPPF paragraph 32 states that plans should be informed by a sustainability appraisal that meets the relevant legal requirements. The SA should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). The NPPF advises that significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.
- 4.38 Because the Council's approach has been simply to decide not to release Green Belt land (with one exception) there has been no assessment of the impact of selected Green Belt release balanced against the economic, social and environmental benefits of meeting housing need in full.
- 4.39 It is noted that the Green Belt Review did not conclude that the only site that could be removed from the Green Belt and brought forward for development was Norton Aerodrome (Policy SA6) but in fact concluded:
- "9.1 The Green Belt Review demonstrates that all land within Sheffield's Green Belt performs Green Belt functions to some degree. Some areas perform more strongly against Green Belt purposes than others.*
- 9.2 Following consultation on the Sheffield Plan Issues and Options (Reg. 18) in 2020, the next step will be to discern the appropriate spatial strategy to take forward into the Draft Sheffield Plan (Reg. 19). If there is a need to remove some land from the Green Belt for development, and exceptional circumstances can be demonstrated for doing this, then Green Belt land will be considered through the site selection methodology."*
- 4.40 Notwithstanding the methodology stating that Green Belt sites will be assessed the 2022 HELAA does not assess the potential of Green Belt sites instead it states:
- "3.13 Sites submitted to the Council between 2009 to March 2022, included land in the Green Belt. These sites have been recorded as known land that is available within the Green Belt for development but have not been included as part of the current supply, because the Green Belt boundary can only be altered through a Local Plan review and exceptional circumstances must be demonstrated to justify any changes. The Sheffield Plan spatial strategy has been developed following a decision made by Members on a cross party basis in early 2022. With the exception of one large previously developed site in the Green Belt, the Local Plan does not propose to release land from the Green Belt for development. Therefore, land in the Green Belt remains in the HELAA database but not within the Local Plan land supply."*
- 4.41 Appendix 3 of the Green Belt review scores the larger greenbelt parcels from 9 to 17 (out of a possible 20) against 4 of the 5 Green Belt Criteria which suggest that there could be Green Belt release without significant adverse impacts on the function of the Green Belt.
- 4.42 Furthermore. the Green Belt review only considers the Green Belt function of larger parcels of land and takes not account of the actual sites that were submitted in the call for sites nor does it take into account the proposed mitigation that is included in some of those submissions. It is our objection that a review of sites submitted for the call for sites against the Green Belt functions will reveal that there is a considerable potential for Green Belt

release with the plan area which would not result in significant adverse impact on the Green Belt function.

- 4.43 It is noted that the NPPF advises that if there are significant adverse impacts which are unavoidable then suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).
- 4.44 The process therefore for site selection should include Green Belt sites (including those submitted for the call for sites) and consider mitigation measures before rejecting them.
- 4.45 The Council's approach to setting the overall housing figure in the plan by taking a simple capacity approach is not supported by the Council's own evidence which suggests that there remain additional sites that could be released to meet the Housing Requirement as defined by the Standard Method and not result in significant harm after mitigation is unsound as it is contrary to national guidance and not supported by the evidence.
- g)** Overall level of housing growth proposed in SP1 a)

i) The level of housing required by the NPPF and NPPG (the Standard Method)

- 4.46 Paragraph 61 of the NPPF requires that strategic policies should be informed by a local housing need assessment, conducted using the Standard Method in national planning guidance – unless exceptional circumstances justify an alternative approach.
- 4.47 The housing requirement as set by the Standard Method is according to the Housing Economic Growth and Demographic Modelling (July 2021) some 2,923 dpa requiring some 49,691 dwellings within the plan period (table 9.1). This requirement has not been challenged and no exceptional circumstances have been set out in any of the supporting evidence base.
- 4.48 Although not referred to in the Plan at all the capacity based housing figure neither meets the level of housing required by the Standard Method and the Council do not seek to claim there are exceptional circumstances to justify an alternative approach.

ii) Are the Council claiming exceptional circumstances?

- 4.49 The Council are not seeking to argue that the Plan should not be based on the housing requirement as defined by the Standard Method.
- 4.50 The decision to the Council to pursue the “capacity based” approach to the housing figure was made by the Cooperative Executive on the 16 February 2022 “Sheffield Local Plan Spatial Options”.
- 4.51 This advised (paragraph 1.3.3) that Sheffield's total housing need based on the Standard Method was 53,500 additional homes over the period 2021-2039. (Additional homes needed $(18 \times 2,923/\text{yr}) = 52,614$ Plus replacement allowance $(18 \times 50/\text{yr}) = 900$).
- 4.52 The report goes on to explain to members the following:

“1.3.4 The housing need figure provides the starting point for setting the housing requirement in the Sheffield Plan. The National Planning Policy Framework states that local plans should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. However, the scale of growth may be restricted where meeting the full need would harm assets identified in the Framework as being of particular importance (e.g., Green Belt and Sites of Special Scientific Interest) or where the adverse effects of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework

as a whole. Relevant text from paragraph 11 of the NPPF is quoted in the legal implications section below (see paragraph 4.3.3)."

4.53 It is important to note that neither the report nor the subsequent reports to members regarding the Local Plan including the report to full Council on 14 December 2022 which approved the Local plan for the regulation 19 consultation highlighted that the need for the Council to demonstrate "exceptional circumstances" where required to depart from the level of need set by the Standard Method. Instead, the officers informed members that the Standard Method was simply the starting point and could be simply be diverged from on the basis of existing Green Belt boundaries.

4.54 At no time have the Council considered that there is a need to demonstrate "exceptional circumstances" to depart from the level of housing required by the Standard Method.

iii) The purpose of the Housing, Economic Growth and Demographic Modelling July 2021

4.55 It should be noted that the purpose of this document was not to argue against the provision of the minimum level of housing as required by the Standard Method but to ensure that the housing requirement in the Local Plan supports the city's economic aspirations taking into account the Regional Econometric Model and the latest demographic evidence (HEGD paragraph 1.2).

4.56 The report concludes (paragraph 9.14) that there is no reason to exceed the Minimum housing requirement set by the Standard method to meet the economic needs of the city.

4.57 It is important to recognise that the HEGD assumes that the level of in commuting at some 63,778 will continue for the whole of the plan period and the report makes no allowance for Sheffield to become more sustainable and accommodate its workers and so reduce this significant number of in commuting.

4.58 In respect of the balance between the employment and housing policies of the city the Employment Land Review considered the level of land required to meet both the constrained figure in policy SP1 and the Minimum figure from the Standard Method and calculated that these would need between +224.26 for the constrained housing figure and 242.05ha and assuming Census levels of in commuting (its lower at 231.28ha for 1:1 commuting) (Table 6.18). The level of employment land being promoted in Policy SP1 of 282ha over the plan period (12.9ha per year) is actually in excess of both projections.

4.59 In terms of consistency between the levels of employment and housing provision the level of employment promoted in SP1 is better aligned with the minimum level of housing as calculated by the Standard Method.

iv) Is it possible to identify suitable and deliverable sites to meet the Standard Method figure?

4.60 While the Integrated Impact Assessment Report (December 2022) started by considering how to accommodate some 40,000 (IIA table 6.1) dwellings rather than the 53,000 the Council have stated is required to meet the Standard method it nevertheless did consider three different options to meeting the 40.000 figure. This included option 3 which incorporated an assessment of a number of Green Belt sites for strategic (1,000 dwelling plus).

4.61 The summary in table 6.1 does not reach the conclusion that release of strategic Green Belt sites should be ruled out as a matter of course as table 7.1 includes number of strategic Green Belt sites.

4.62 The IIA concludes in paragraph 7.5.13 that it has explored in detail a range of Green Belt

locations that could potentially be reasonable for more detailed investigation for housing development should the need arise in Sheffield.

4.63 Table 9.1 (page 51) demonstrates that sites could be identified to meet a total of 52,580 dwellings in the plan period which would require the release of some 11,990 dwellings from the green belt.

4.64 Paragraph 9.1.11 of the IIA states:

“When considering Green Belt release for the spatial options, consideration is given to the interim IIA work that focused upon the likely effects of development in strategic growth locations in the Green Belt. An assumption is made that the locations considered to be unreasonable options, would not come forward under the growth options that require Green Belt release. The sequence of Green Belt release would be firstly to consider sustainably located brownfield sites (only 270 dwellings have been identified at Norton as suitable in this regard), followed by greenfield sites that are sustainably located (or can be made so). At the highest scale of growth it is presumed that some ‘less sustainable locations’ may need to be involved.”

4.65 While this makes reference to “less sustainable” Green Belt locations might need to be allocated this is a matter that could be addressed on a site by site basis. What is central to the objection to the Council’s capacity based approach is that the evidence is that there is a reasonable alternative to meet the Minimum level of Housing set by the Standard Method

v) Has the Duty to Cooperate been engaged to establish if other authorities could accommodate the unmet need?

4.66 It is important prior to the inspector opening the examination that the question of whether the Council needed to engage in the DtC to assess if the neighbouring authorities could accommodate the unmet need – this being the difference between the Council’s capacity based housing figure and the minimum level of housing required to meet the Standard Method calculation.

4.67 It is our view that because the Council failed to understand that if they underprovided housing compared to the Standard Method without proving exceptional circumstances as to why the figure was inappropriate then the DtC would have to be engaged. The Council have approached the DtC they on the basis that by planning for a capacity based level of housing they are meeting their housing need. This is not the case.

4.68 It is accepted that the need to provide exceptional circumstances in order to set a housing need figure lower than the Standard Method has never been highlighted to the members. Without doing this the Housing need remains at the level calculate by the Standard Method and to depart from this the Council should follow the guidance in Paragraph 61 of the NPPF

4.69 Having a capacity based housing figure (which is how the Council describe the SP1 figure in paragraph 3.8) requires the Council to have engaged in the Duty to Co-operate to establish if other Councils can accommodate this unmet need.

4.70 As highlighted in our object to paragraph 3.7 the Duty to Cooperate (DtC), unlike soundness problems this cannot be remedied once the Plan has been submitted for examination. This is clear from the case of Samuel Smith Old Brewery (Tadcaster) v Selby DC [2015] EWCA Civ 1107 and in particular, paragraphs 38 and 40.

vi) Is the Council’s justification for not meeting the minimum housing need for the city sound?

4.71 The Councils reasoning for not meeting the minimum housing need is set out in paragraphs 1.6.21 to 1.6.23 This lists the benefits of meeting the minimum housing requirement as being:

- It provides the opportunity to allocate sites in all market sub-areas of the city.
- It would deliver a better mix of house types overall – with more family-sized homes.
- Viability is less of a problem on greenfield sites.
- It could provide an opportunity to support investment in new rail infrastructure (the Barrow Hill line between Sheffield and Chesterfield, and/or the Upper Don Valley between Sheffield and Stocksbridge);
- It offers potential to better address employment land constraints, provide jobs/ mixed use development;
- The amount of housing being provided would be meet the housing need figure calculated using the Government methodology
- It would offer further potential to provide affordable homes (because greenfield sites are more viable and because more housing is being delivered overall)

4.72 The report identifies the main disbenefits of this option include:

- The scale of Green Belt release necessary could seriously harm Sheffield's reputation as 'the Outdoor City'
- It is highly likely that harm would be caused to sites of significant landscape value.
- Additional Green Belt land would also be required for employment uses – to ensure that the population and housing growth are aligned.
- There is a significant risk that it could undermine urban regeneration, especially if the demand for new homes fails to materialise (meaning developers are able to concentrate on developing greenfield sites)
- It would lead to more commuting from suburban areas – more pollution and adverse impacts on the net zero carbon target.
- If demand for housing does not materialise, the Housing Delivery Test might not be met – this triggers the 'tilted balance' in favour of granting planning applications on unallocated greenfield sites.
- Major infrastructure investment would be needed to make some greenfield sites sustainable (especially transport, health facilities, schools)

4.73 Taking these negative points in turn:

- Reputational damage – by actually planning for some Green Belt/ green field development the Council could actually enhance its reputation as the "Outdoor City" by creating modern highly sustainable new neighbourhoods which deliver high levels of open space and Biodiversity Net Gain. Conversely reputational damage is being caused by young families not being able to meet their need for affordable family housing in the city and having to move out. It should be noted that claimed reputational damage is far from demonstrating exceptional circumstances required by NPPF paragraph 61.
- The claim that meeting the minimum level of housing is likely to cause harm to sites of significant landscape value is unsubstantiated by the evidence base. The Preliminary Landscape Character Assessment (LCA) does not identify any "sites of significant landscape value". The LCA identified the main character areas and types within the Sheffield Green Belt Area to provide a tool for Planning officers in assessing the

proposals submitted by objectors to the draft SDF City Policies and Sites document to reallocate Green Belt Countryside Areas for housing or other developments (LDA page 7). The field studies for the Addendum were carried out in summer 2022 appendix 1 appraises just 32 sites and only finds one to have a low/no capacity for growth. While the addendum does not seek to review all potential Green Belt releases submitted thorough the call for sites the fact that, in landscape terms neither document suggest that there exist over riding landscape reasons not to release some of the Green Belt land assessed.

- The claim that additional Green Belt land would also be required for employment uses are required to ensure that the population and housing growth are aligned. This statement is unsupported by evidence.
 - There is very strong evidence that the strategy will not actually deliver the level of housing suggested and as such Green Belt sites might be required just to support the level of growth projected.
 - This statement is not supported by the evidence base.
 - The Employment Land Review 2021 (ELR table 6.13 page 52) calculates that meeting SCR policy on (Capacity restrained housing) B Class floorspace would require some 114.89 hectares of employment land while providing jobs to meet the population generated by the Standard Method (minimum level housing) would require 132.69 hectares of employment land. Both these figures are below the level of employment land that is being promoted in Policy SP1 of 12.9ha per year (282ha over the plan period).
 - Even making an allowance for a further 5 years of employment land after 2038 and the loss of employment land Table 6.18 still only suggests that some 242.05ha required to make provision for the Standard Method population assuming Census levels of in commuting (its lower at 231.28ha for 1:1 commuting). Again this is below the level being provided by SP1.
 - In terms of the increase in stock required the Policy On approach would require a 24% increase in stock while the Standard Method would require between 25 and 26% increase in stock.
 - The ELR (page 63 paragraph 7.7) recommended that Sheffield City's employment land OAN should be in the range of between 176 ha (Labour Supply Scenario 6b, Issues/Options 1:1 commuting) and 242 ha (Labour Supply Scenario 5a, Standard Method Census commuting) up to 2038. This point should be discounted as it is not based on the evidence.
- The objection to releasing Green Belt land that it represents a significant risk that it could undermine urban regeneration is again unsubstantiated.
 - As highlighted in our objection to paragraph 3.6 is that the available evidence in the Whole Plan Viability Tables 10.2a to 10.2f and appendix 18 clearly demonstrate that it is not competition from green field sites that is preventing these sites from coming forward but that there are systemic viability issues with these sites, a situation made worse by the existing CIL requirement and the proposed affordable housing requirements which render all brownfield sites in the following sub areas unviable: City Centre, East and North East, Manor / Arbourthorne / Gleadless, Urban West. Stocksbridge / Deepcar, Rural Upper Don Valley, Chapeltown / Ecclesfield.
 - In addition is should be recognised that the type and tenure of accommodation that is to be provided in the City Centre Sub Area is significantly different to

that which would be provide on Green Belt sites. Delivery in the City Centre Sub Area has been (and will be) very much focused on private rented apartments whereas Green Belt sites will deliver family homes. This means the alternative location for developers seeking to meet Sheffield unmet need for family housing are actually Green Belt sites in the surrounding local authorities.

- The assertion that releasing Green Belt sites for family housing would lead to more commuting from suburban areas thereby increasing pollution and having adverse impacts on the net zero carbon target.
 - There is no evidence that supports this assertion its based upon the inaccurate assumption that families that are excluded from family home ownership on Green Belt sites will instead choose to take up residence in rented apartments in the city centre. As employers in Sheffield City centre this is not our companies experience, as we experience those staff members who wish to purchase family housing tend to seek this type and tenure of housing outside of the city if they cannot secure second hand stock within the city.
 - This experience is supported by evidence from the 2011 census which shows that there are some 63,776 people who already commute into the city to work. It should be noted that the Housing, Economic Growth and Demographic Modelling does not seek to influence this existing pattern of commuting by providing additional accommodation which could allow some of those 63,776 persons who commute into the city to actually live in the city and commute a shorter distance.
 - Providing for some of the 63,776 workers who commute across the city's boundaries to work each day the opportunity to live in a modern sustainable family home closer to their work and on public transport routes who assist rather than detract from meeting objectives around zero carbon and pollution.

Chart 1: Commuting pattern into Sheffield 2011 census



- The suggestion that the minimum housing target should not be met on the basis that demand for housing may not materialise, and such the Housing Delivery Test might trigger the 'tilted balance' is not a reason to meet the minimum level of housing. It should be noted that in our analysis the City are likely to fail the HDT or the 5 year land supply test at some point in the near future even if the plan is adopted as drafted because it has not allocated deliverable site or sites that are capable of delivery in the next five years. If this was a real concern the Council would have made different allocations to allow for all of the market to be met rather than allocating sites that just meet a limited sector of the market in terms of tenure, type and location of dwellings.
- While it is alleged that some greenfield sites might require infrastructure investment to make these locations sustainable in terms of transport, health facilities, and schools. Unlike the Sub Areas where the strategy concentrates the majority of development the majority of Green Belt sites are in areas which will not only be able to deliver CIL and affordable housing but is also likely to be able to fund other infrastructure. This is especially the case if the Plan allocates strategic sites.

vii) Will the sites allocated to meet the housing figure in SP1 deliver over the plan period and will there be a five year land supply on the date of adoption?

4.74 In accordance with national policy, a satisfactory housing delivery trajectory that clearly demonstrates that the sites proposed for development, when considered as a whole, will be capable of maintaining a five-year supply of housing land throughout the plan period, should be submitted. The requirement for the first five years should include the appropriate buffer. To demonstrate this the Council will need to provide evidence that all of the sites included in policies Ca1 to SA9 are developable and deliverable within the timescales suggested in the trajectory.

4.75 The trajectory should be based on robust evidence and clearly capable of accommodating slippage in site development or delivery failure. In accordance with national policy, the

trajectory should also demonstrate that the under-delivery in the plan years prior to adoption can be confidently made up in the first five years post adoption.

4.76 The 5-Year Housing Land Supply Monitoring Report (December 2022) identifies (Table 4) a 5-year deliverable supply of 3.63 years.

4.77 This is based upon the Standard Method minimum housing requirement of 3,016 dwellings (page 5).

4.78 This report does not provide evidence on whether there will be a five year supply on the date of adoption (which at best would be 2024/5).

4.79 At present the plan is unsound as it does not demonstrate how the capacity based housing figure will result in 5 year land supply at the date of adoption.

4.80 NPPG (Paragraph: 004 Reference ID: 68-004-20190722) requires that:

“In plan-making, strategic policies should identify a 5 year housing land supply from the intended date of adoption of the plan.”

4.81 **SP1 a) Policy Change required:**

a) **Delete 35,350 new homes and replace with “a minimum of 51,272 net dwellings (3,016 dwellings per annum from 2022 to 2039)”**

b) **Delete allocations as objected to and replace with deliverable site as set out in our other objections**

h) Objection to SP1 c) number of allocations

4.82 As presently drafted the number of allocations is incorrect as many of the allocations are not deliverable even on the Councils own evidence.

4.83 In addition, and in line with the objection to SP1 additional Green Belt sites are required to be allocated to meet the minimum housing requirement as set by the Standard Method.

4.84 The number of allocations should be amended to reflect our objection to sites in policies CA1 to SA9 requiring their deletion and also reflect the number of replacement sites that are required. It should also be increased to reflect the new site that are required to meet the minimum level of housing need.

4.85 **Policy Change required:**

a) **Update number of allocations to reflect these objections.**

i) Objection to SP1 h) the removal of former Norton Aerodrome from the Green Belt and the continued projection of existing Green Belt boundaries

4.86 The Sheffield Green Belt was established in 1938, to the south and west of the city. A formal Green Belt plan was not produced by the City Council until 1980. Following a public inquiry, the plan became operative in late 1983.

4.87 The 1998 UPD only made two small changes to the Green Belt boundary.

- 4.88 At present the Green Belt of South and West Yorkshire comprises over 248,000 hectares
- 4.89 There has been no substantive changes to the Sheffield Green Belt for a considerable period of time, however it should be noted that in 1998 the development pressures were very different to those that exist today.
- 4.90 The Unitary Development Plan (UDP) was adopted in 1998. The plan period was from 1991 to 2001 and the plan allocated land for 10,700 dwellings to be completed in the period 1991 to 2001 (10 years) i.e., 1,070 dpa (Page 145 UDP policy H1). This was based upon the Regional Planning Guidance Note (RPG5) 1989 paragraph 12 and appendix (UDP page 145 side bar). The figure took account the 1991 Census results and the mid 1992 based household formation rates for Sheffield.
- 4.91 The context for the UDP policies was the expectation that the number of people living in Sheffield was expected to fall from 529,300 in 1991 to around 523,400 by 2001 a decrease in population of just over 1% (page 144). This is an increase in population of 10.5% from 529,300 in the UDP for 1991.
- 4.92 The UDP policies were based upon the need to continue to provide new housing because:
- a) on average each home will be occupied by fewer people than before
 - b) some houses and flats are reaching the end of their useful life and need to be replaced.
 - c) a lot of existing housing does not meet the needs of many groups of people.
- 4.93 The UDP states that the Secretary of State for the Environment regarded the retention of the extensive area of Green Belts overriding and limiting the scope for meeting housing demand within the District at that time.
- 4.94 The evidence and the policy background to the UDP is far out of date. The amount of land it allocated for development is not capable of meeting current needs. This means that the detailed policy boundaries are out of date and in need of urgent revision.
- 4.95 The absence of allocations in a development plan since 1998 has meant that the Council's response to the housing crisis has been through the exercise of Development Management decisions, the outcome of which is set out later in this report. This highlights that delivery has been concentrated both within a very limited location around the City Centre and within two specific housing types these being 1 and 2 bed apartments and Student cluster flats. In conclusion the local policies regarding housing and in particular housing allocations are based upon a dated approach, dated guidance and dated evidence, which is only now beginning to be reviewed and revised. The present situation is summarised below:
- 4.96 The 2009 Core Strategy only proposed one adjustment to the Green Belt boundary at Sheffield Airport. Again, the background to this approach was a housing requirement based upon:
- a) Regional Spatial Strategy
 - b) Stepped requirement Policy CS 22 of 1,025 dpa 2004/05 to 2007/08 (4 years) then 1,425 dpa 2008/09 to 2025/26 (18 years) and an average of 1,353 dpa. This is under half (42%) of the requirement under the new Standard Method.
 - c) The adoption of a City Sites and Policy plan which was to contain allocations to meet the housing requirement and never materialised.
- 4.97 The Council have not produced a plan that designates new housing allocations since 1998, over 25 years ago.

- 4.98 It is over a decade since the Council adopted any development plan.
- 4.99 The inner boundaries of the Green Belt have not been subject to any meaningful change since they were adopted in 1983.
- 4.100 The present situation is significantly different both in policy terms and in terms of development needs from when the Green Belt boundaries were first set, the situation is also very different from when they were considered in 1998 in particular:
- a) The housing need is substantially increased, and Sheffield is no longer planning for a falling population.
 - b) The current Green Belt boundaries will prevent the minimum level of housing being provided (contrary to NPPF paragraph 61)
 - c) The current green will also prevent the delivery of a range of housing to meet the needs of the whole population as it concentrates development in locations where delivery is in the form of apartments and usually rented. In particular the resulting Strategy significantly under provides family housing and makes no provision for older persons specialist accommodation (see our objection to SP2 and H1).
 - d) The NPPF provides exceptionally for the review of Green Belt boundaries (paragraph 140), and the need to meet housing need is such an exception, as is the need to provide affordable housing and the provision of older persons accommodation is also capable of being an exceptional circumstance.
 - e) In reviewing Green belts, the need to provide sustainable patterns of development is also a consideration (NPPF paragraph 141) and such a review could seek to accommodate some of the 63,774 commuters who travel into the city.
 - f) Various Council documents have not only accepted that meeting housing needs can be exceptional circumstances, but these documents have also assessed the potential of Green Belt sites to be release to meet the minimum level of housing as required by the paragraph 61 of the NPPF. This evidence does not conclude that there is or should be a capacity based approach to the provision of housing.
- 4.101 The situation is also different in that the Council have in the process of developing the current plan there have been a number of reports that have considered the potential for Green Belt release these include:
- a) Citywide Growth Options November 2015 (CD3.11)
 - i) The Council consulted on the 'Citywide Options for Growth to 2034' document in 2015. This sought view on how the Council could plan to meet between 40,000 and 46,000 homes between 2014 and 2034. This contained 5 options for development although as the table 4 on page 70 illustrates, even cumulatively none of these cascading options would deliver the 46,000 homes at the top of the range:
 - ii) Option A: Urban Capacity – this would only deliver 19,300 homes.
 - iii) Option B: Urban Intensification – this would deliver an additional 12,750 homes and a cumulative total of 32,050 homes.
 - iv) Option C: Urban Remodelling– this would deliver an additional 4,300 homes and a cumulative total of 36,350 homes.
 - v) Option D: Limited number of Larger Urban Extensions into Green Belt– this would deliver an additional 6,100 homes and 42,450 homes.
 - vi) Option E: Multiple Smaller Green Belt Releases– this would deliver an

additional 550 homes and 43,000 homes.

- b) In September 2020, the Sheffield Plan Issues and Options document presented all three options as requiring the reuse of previously developed sites and in addition options 2 and 3 suggest Green Belt release. This was to accommodate only 2,200 dpa.
- c) Green Belt Review 2020 did not conclude that the only site that could be removed from the Green Belt and brought forward for development was Norton Aerodrome (Policy SA6) but in fact concluded:
“9.1 The Green Belt Review demonstrates that all land within Sheffield’s Green Belt performs Green Belt functions to some degree. Some areas perform more strongly against Green Belt purposes than others.”
- d) The Integrated Impact Assessment Report (December 2022) (table 6.1) considered three different options to meeting the 40,000 figure. This included option 3 which incorporated an assessment of a number of Green Belt sites for strategic (1,000 dwelling plus). The summary in table 6.1 does not reach the conclusion that release of strategic Green Belt sites should be ruled out as a matter of course as table 7.1 includes number of strategic Green Belt sites. In paragraph 7.5.13 the IIA concludes in that it has explored in detail a range of Green Belt locations that could potentially be reasonable for more detailed investigation for housing development should the need arise in Sheffield. Table 9.1 (page 51) demonstrates that sites could be identified to meet a total of 52,580 dwellings in the plan period which would require the release of some 11,990 dwellings from the green belt.

4.102 The purpose of reviewing albeit briefly these reports is that they clearly highlight that there are a range of Green Belt sites that have previously been considered reasonable alternatives (i.e. suitable and deliverable) which could be allocated to meet the minimum level of housing need.

4.103 In terms of the IIA it is appropriate to note that this only considered the release of strategic sites from the Green Belt but there is the potential to release smaller sites from the Green Belt which would be no less sustainable in terms of their relationship to services, facilities and public transport routes than some of the employment areas that the Council are encouraging to be redeveloped for housing. The inclusion of these smaller sites would increase the choice from which the Council could select suitable and deliverable sites to meet the housing need.

4.104 In passing it is worth noting that the approach offsetting a minimum size level for Green Belt release in terms of only large sites being suitable was found unsound by the inspector at the St Albans Local Plan examination.

4.105 The removal of a single site from the Green Belt is considered unsound for the following reasons:

- a) There are clearly exceptional circumstances, recognised in the Councils earlier documents, which justify a wider review of the green belt, these include;
 - i) meeting the minimum level of housing need (NPPF paragraph 61)
 - ii) making provision for different groups in the community by provide the appropriate range of accommodation in terms of the size, type and tenure of housing including those who require affordable housing, families with children, and older people (paragraph 62)
 - iii) Securing sustainable patterns of development including providing the

opportunity for some of the 63,774 commuters who are projected to travel into the city each year for the next 20 years to move into the city (NPPF Paragraph 142).

- iv) To provide a level of housing commensurate with the proposed level of employment land provision.
- b) The exceptional circumstances for the release of Norton Aerodrome site have not been demonstrated. The proposed allocation is considered unsound for the following reasons:
 - i) Paragraphs 4.68 to 4.70 make no reference to the site or exceptional circumstances and so provide no justification for its release. As such the proposed allocation is unsound as it is not justified or in accordance with national policy.
 - ii) Although a previously developed site much of it is now open and its elevated position on the southern side of Sheffield means that it will have a visual impact on the openness of the green belt.
 - iii) In respect on the impact on the functions of the Green Belt there are other sites with similar impact on Green Belt functions that can also deliver much needed family or specialist housing to meet the Councils unmet need and therefore represent reasonable alternatives that should also be considered in determining whether the minimum level of housing should be accommodated by the plan.
 - iv) The proposed allocation does not set out ways in which the impact of removing this land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land (NPPF paragraph 142). It is noted that other potential Green Belt releases can achieve this requirement.
 - v) It is contrary to NPPF paragraph 143 a) in that it does not result in consistency with the development plan's strategy for meeting identified and the requirements for sustainable development in that it neither meets identified need nor delivers sustainability by displacing unmet need into local authorities who themselves are already releasing Green Belt site to meet their own needs.
 - vi) It is contrary to NPPF paragraph 143 b) as the resulting boundaries after this review include land which it is unnecessary to keep permanently open and no longer serve a Green Belt function (see plan on next page);
 - vii) It is contrary to NPPF paragraph 143 e) the Council have simply not attempted to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period. The evidence is that there are exceptional circumstances at the present time for a wider review of the Green Belt to meet existing needs, there is no evidence that the pressure for additional dwellings will decrease in fact the level of employment land being planned for is likely to continue to require the Minimum level of housing to support it.
 - viii) It is contrary to NPPF paragraph 143 c) given the inability to meet existing needs within current Greenbelt boundaries it is clear that there remains a clear necessity to identify areas of safeguarded land between the urban area and the Green Belt to meet longer-term development needs stretching well beyond the plan period;

4.106 Policy Change required either:



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Insert Client Name
Insert Name of Document
Insert Month & Year

- a) **Delete allocation, OR**
- b) **Undertake a comprehensive review of the Green Belt in accordance with policy and allocate addition sites to meet the minimum housing need as calculated by the Standard Method.**

5.0 OBJECTION TO POLICY SP2 SPATIAL STRATEGY

- 5.1 The proposed strategy of concentrating a below minimum level of housing into existing urban areas and primarily former industrial areas in the city centre sub area is unsound for the following reasons:
- a)** The Whole Plan Viability Assessment identifies that most of the proposed allocations as being unviable.
- 5.2 As will be demonstrated below and by our objections to individual allocations the strategy concentrates development in allocations which are unviable, have considerable levels of constraints and on sites which have considerable other issues with delivery.
- 5.3 The table on the next pages applies the viability results from the Whole Plan Viability Assessment to the allocations and this highlights that most are unviable.
- 5.4 Just removing those proposed allocation which the Whole Plan viability Assessment defines as being unviable would reduce the deliverable site significantly and the likely contribution from the proposed allocations from a total of 27,229 to just 2,703 dwellings.
- 5.5 This is because the Council have allocated sites in locations and with a scale of development which the evidence in the whole Plan Viability Assessment suggest swill be unviable. The number of dwellings on sites identified as being unviable is some 24,526. While each site will of course have its own circumstances for these allocation to be sound the Council will need to demonstrate that they are capable of being delivered, if they are to be included in the five year land supply from the date of adoption or at least deliverable within the plan period.
- 5.6 At present the evidence available for these sites is that they are unviable and not deliverable and as such would be unsound to include in the plan.
- b)** The viability issues identified in the Whole Plan Viability Assessment highlight that few sites will deliver affordable housing.
- 5.7 The table on the next pages also applies the viability results from the whole plan viability assessment to the allocations and this highlights that most are unviable and only a few will deliver affordable housing.
- 5.8 As a result of the above the strategy will only deliver some 808 affordable dwellings from the proposed allocations. This is an average of 48 dpa.
- 5.9 This falls significantly short of the need in the SMHA of 902 dpa. The likely level of affordable housing that will be delivered from the chosen strategy is according to the Councils own evidence less than a single year's requirement.
- c)** The strategy over concentrates development in a single location which results in an under delivery of family homes and specialist accommodation.
- 5.10 This issue is set out in full after the table on the next pages.

Table 1. Viability assessment of proposed allocations from the Whole Plan Viability Assessment

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	Affordable delivery - Policy Compliant	Affordable delivery with developer contribution
CA1					
KN03	191	2743	Not Viable	19	0
KN04	200		Not Viable	20	0
KN05	132		Not Viable	13	0
KN06	114		Not Viable	11	0
KN07	98		Not Viable	10	0
KN08	96		Not Viable	10	0
KN09	96		Not Viable	10	0
KN10	90		Not Viable	9	0
KN11	87		Not Viable	9	0
KN12	86		Not Viable	9	0
KN13	93		Not Viable	9	0
KN14	75		Not Viable	8	0
KN15	50		Not Viable	5	0
KN16	62		Not Viable	6	0
KN17	61		Not Viable	6	0
KN18	60		Not Viable	6	0
KN19	60		Not Viable	6	0
KN20	54		Not Viable	5	0
KN21	33		Not Viable	3	0
KN22	50		Not Viable	5	0
KN23	50		Not Viable	5	0
KN24	60		Not Viable	6	0
KN25	45		Not Viable	5	0
KN26	44		Not Viable	4	0

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	Affordable delivery - Policy Compliant	Affordable delivery with developer contribution
KN27	28		Not Viable	3	0
KN28	35		Not Viable	4	0
KN29	23		Not Viable	2	0
KN30	30		Not Viable	3	0
KN31	18		Not Viable	2	0
KN32	15		Not Viable	2	0
KN33	13		Not Viable	1	0
KN34	12		Not Viable	1	0
KN35	10		Not Viable	1	0
KN36	572		Not Viable	57	0
CA2		1849			
CW03	368		Not Viable	37	0
CW04	75		Not Viable	8	0
CW05	56		Not Viable	6	0
CW06	19		Not Viable	2	0
CW07	5		Not Viable		0
CW08	3		Not Viable		0
CW09	336		Not Viable	34	0
CW10	268		Not Viable	27	0
CW11	206		Not Viable	21	0
CW12	94		Not Viable	9	0
CW13	83		Not Viable	8	0
CW14	65		Not Viable	7	0
CW15	46		Not Viable	5	0
CW16	43		Not Viable	4	0
CW17	77		Not Viable	8	0
CW18	28		Not Viable	3	0

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	Affordable delivery - Policy Compliant	Affordable delivery with developer contribution
CW19	16		Not Viable	2	0
CW20	16		Not Viable	2	0
CW21	16		Not Viable	2	0
CW22	15		Not Viable	2	0
CW23	14		Not Viable	1	0
CA3					
SU02	32	3998	Not Viable	3	0
SU03	500		Not Viable	50	0
SU04	355		Not Viable	36	0
SU05	116		Not Viable	12	0
SU06	100		Not Viable	10	0
SU07	284		Not Viable	28	0
SU08	225		Not Viable	23	0
SU09	229		Not Viable	23	0
SU10	34		Not Viable	3	0
SU11	118		Not Viable	12	0
SU12	216		Not Viable	22	0
SU13	120		Not Viable	12	0
SU14	118		Not Viable	12	0
SU15	27		Not Viable	3	0
SU16	93		Not Viable	9	0
SU17	88		Not Viable	9	0
SU18	85		Not Viable	9	0
SU19	84		Not Viable	8	0
SU20	61		Not Viable	6	0
SU21	58		Not Viable	6	0
SU22	58		Not Viable	6	0

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	Affordable delivery - Policy Compliant	Affordable delivery with developer contribution
SU23	56		Not Viable	6	0
SU24	48		Not Viable	5	0
SU25	48		Not Viable	5	0
SU26	45		Not Viable	5	0
SU27	23		Not Viable	2	0
SU28	43		Not Viable	4	0
SU29	47		Not Viable	5	0
SU30	22		Not Viable	2	0
SU31	39		Not Viable	4	0
SU32	39		Not Viable	4	0
SU33	38		Not Viable	4	0
SU34	77		Not Viable	8	0
SU35	20		Not Viable	2	0
SU36	20		Not Viable	2	0
SU37	61		Not Viable	6	0
SU38	29		Not Viable	3	0
SU39	46		Not Viable	5	0
SU40	26		Not Viable	3	0
SU41	25		Not Viable	3	0
SU42	57		Not Viable	6	0
SU43	17		Not Viable	2	0
SU44	22		Not Viable	2	0
SU45	21		Not Viable	2	0
SU46	21		Not Viable	2	0
SU47	10		Not Viable	1	0
SU48	20		Not Viable	2	0
SU49	18		Not Viable	2	0

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	Affordable delivery - Policy Compliant	Affordable delivery with developer contribution
SU50	18		Not Viable	2	0
SU51	17		Not Viable	2	0
SU52	13		Not Viable	1	0
SU53	11		Not Viable	1	0
CA4		2101			
SV04	303		Not Viable	30	0
SV05	42		Not Viable	4	0
SV06	335		Not Viable	34	0
SV07	149		Not Viable	15	0
SV08	121		Not Viable	12	0
SV09	117		Not Viable	12	0
SV10	108		Not Viable	11	0
SV11	102		Not Viable	10	0
SV12	100		Not Viable	10	0
SV13	96		Not Viable	10	0
SV14	95		Not Viable	10	0
SV15	89		Not Viable	9	0
SV16	85		Not Viable	9	0
SV17	75		Not Viable	8	0
SV18	66		Not Viable	7	0
SV19	58		Not Viable	6	0
SV20	42		Not Viable	4	0
SV21	40		Not Viable	4	0
SV22	30		Not Viable	3	0
SV23	22		Not Viable	2	0
SV24	16	Not Viable	2	0	
SV25	10	Not Viable	1	0	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	Affordable delivery - Policy Compliant	Affordable delivery with developer contribution
CA5					
HC03	1006	6095	Not Viable	101	0
HC04	100		Not Viable	10	0
HC05	52		Not Viable	5	0
HC06	9		Not Viable		0
HC07	1230		Not Viable	123	0
HC08	714		Not Viable	71	0
HC09	410		Not Viable	41	0
HC10	364		Not Viable	36	0
HC11	364		Not Viable	36	0
HC12	298		Not Viable	30	0
HC13	213		Not Viable	21	0
HC14	162		Not Viable	16	0
HC15	136		Not Viable	14	0
HC16	135		Not Viable	14	0
HC17	135		Not Viable	14	0
HC18	101		Not Viable	10	0
HC19	97		Not Viable	10	0
HC20	95		Not Viable	10	0
HC21	93		Not Viable	9	0
HC22	92		Not Viable	9	0
HC23	77		Not Viable	8	0
HC24	46		Not Viable	5	0
HC25	45		Not Viable	5	0
HC26	45		Not Viable	5	0
HC27	30		Not Viable	3	0
HC28	22		Not Viable	2	0

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	Affordable delivery - Policy Compliant	Affordable delivery with developer contribution
HC29	12		Not Viable	1	0
HC30	12		Not Viable	1	0
CA6					
LR01	466	1495	Not Viable	47	0
LR02	367		Not Viable	37	0
LR03	336		Not Viable	34	0
LR04	111		Not Viable	11	0
LR05	84		Not Viable	8	0
LR06	61		Not Viable	6	0
LR07	56		Not Viable	6	0
LR08	14		Not Viable	1	0
SA2					
NWS08	13	1005	Viable range £0 - £20,000	4	4
NWS09	311		Viable range £0 - £20,000	93	93
NWS10	169		Viable range £0 - £20,000	51	51
NWS11	77		Viable range £0 - £20,000	23	23
NWS12	76		Viable range £0 - £20,000	23	23
NWS13	63		Viable range £0 - £20,000	19	19
NWS14	48		Viable range £0 - £20,000	14	14
NWS15	41		Viable range £0 - £20,000	12	12
NWS16	32		Viable range £0 - £20,000	10	10
NWS17	23		Viable range £0 - £20,000	7	7
NWS18	22		Viable range £0 - £20,000	7	7
NWS19	19		Viable range £0 - £20,000	6	6
NWS20	14		Viable range £0 - £20,000	4	4
NWS21	14		Viable range £0 - £20,000	4	4
NWS22	14		Viable range £0 - £20,000	4	4

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	Affordable delivery - Policy Compliant	Affordable delivery with developer contribution
NWS23	13		Viable range £0 - £20,000	4	4
NWS24	13		Viable range £0 - £20,000	4	4
NWS25	12		Viable range £0 - £20,000	4	4
NWS26	11		Viable range £0 - £20,000	3	3
NWS27	10		Viable range £0 - £20,000	3	3
NWS28	10		Viable range £0 - £20,000	3	3
SA3					
NES09	53	801	Not Viable	5	0
NES10	32		Not Viable	3	0
NES11	88		Not Viable	9	0
NES12	73		Not Viable	7	0
NES13	68		Not Viable	7	0
NES14	44		Not Viable	4	0
NES15	33		Not Viable	3	0
NES16	32		Not Viable	3	0
NES17	29		Not Viable	3	0
NES18	24		Not Viable	2	0
NES19	24		Not Viable	2	0
NES20	24		Not Viable	2	0
NES21	23		Not Viable	2	0
NES22	21		Not Viable	2	0
NES23	20		Not Viable	2	0
NES24	20		Not Viable	2	0
NES25	20		Not Viable	2	0
NES26	20		Not Viable	2	0
NES27	19		Not Viable	2	0
NES28	19		Not Viable	2	0

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	Affordable delivery - Policy Compliant	Affordable delivery with developer contribution
NES29	19	2899	Not Viable	2	0
NES30	19		Not Viable	2	0
NES31	18		Not Viable	2	0
NES32	17		Not Viable	2	0
NES33	16		Not Viable	2	0
NES34	14		Not Viable	1	0
NES35	12		Not Viable	1	0
SA4					
ES20	80	2899	Not Viable	8	0
ES21	28		Not Viable	3	0
ES22	596		Not Viable	60	0
ES23	371		Not Viable	37	0
ES24	210		Not Viable	21	0
ES25	147		Not Viable	15	0
ES26	121		Not Viable	12	0
ES27	120		Not Viable	12	0
ES28	116		Not Viable	12	0
ES29	101		Not Viable	10	0
ES30	98		Not Viable	10	0
ES31	93		Not Viable	9	0
ES32	93		Not Viable	9	0
ES33	82		Not Viable	8	0
ES34	68		Not Viable	7	0
ES35	63		Not Viable	6	0
ES36	48		Not Viable	5	0
ES37	47		Not Viable	5	0
ES38	46	Not Viable	5	0	

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	Affordable delivery - Policy Compliant	Affordable delivery with developer contribution
ES39	42	1607	Not Viable	4	0
ES40	41		Not Viable	4	0
ES41	39		Not Viable	4	0
ES42	37		Not Viable	4	0
ES43	35		Not Viable	4	0
ES44	28		Not Viable	3	0
ES45	26		Not Viable	3	0
ES46	24		Not Viable	2	0
ES47	17		Not Viable	2	0
ES48	17		Not Viable	2	0
ES49	16		Not Viable	2	0
ES50	16		Not Viable	2	0
ES51	12		Not Viable	1	0
ES52	11		Not Viable	1	0
ES53	10	Not Viable	1	0	
SA5					
SES08	272	1607	Not Viable	27	0
SES09	218	1607	Not Viable	22	0
SES10	151	1607	Not Viable	15	0
SES11	151	1607	Not Viable	15	0
SES12	90	1607	Not Viable	9	0
SES13	75	1607	Not Viable	8	0
SES14	74	1607	Not Viable	7	0
SES15	50	1607	Not Viable	5	0
SES16	34	1607	Not Viable	3	0
SES17	31	1607	Not Viable	3	0
SES18	28	1607	Not Viable	3	0

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	Affordable delivery - Policy Compliant	Affordable delivery with developer contribution
SES19	27	760	Not Viable	3	0
SES20	27		Not Viable	3	0
SES21	26		Not Viable	3	0
SES22	21		Not Viable	2	0
SES23	20		Not Viable	2	0
SES24	19		Not Viable	2	0
SES25	14		Not Viable	1	0
SES26	11		Not Viable	1	0
SES27	10		Not Viable	1	0
SES28	258		Not Viable	26	0
SA6					
SS01	52		Viable range £0 - £20,000	16	16
SS02	45		Viable range £0 - £20,000	14	14
SS03	44		Viable range £0 - £20,000	13	13
SS04	37		Viable range £0 - £20,000	11	11
SS05	33		Viable range £0 - £20,000	10	10
SS06	30		Viable range £0 - £20,000	9	9
SS07	28		Viable range £0 - £20,000	8	8
SS08	26		Viable range £0 - £20,000	8	8
SS09	22		Viable range £0 - £20,000	7	7
SS10	17		Viable range £0 - £20,000	5	5
SS11	14		Viable range £0 - £20,000	4	4
SS12	14		Viable range £0 - £20,000	4	4
SS13	14		Viable range £0 - £20,000	4	4
SS14	12		Viable range £0 - £20,000	4	4
SS15	11		Viable range £0 - £20,000	3	3
SS16	10		Viable range £0 - £20,000	3	3

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	Affordable delivery - Policy Compliant	Affordable delivery with developer contribution
SS17	270	938	Viable range £0 - £20,000	81	81
SS18	81		Viable range £0 - £20,000	24	24
SA7					
SWS01	15	938	Viable range £0 - £20,000	5	5
SWS02	369		Viable range £0 - £20,000	111	111
SWS03	184		Viable range £0 - £20,000	55	55
SWS04	60		Viable range £0 - £20,000	18	18
SWS05	59		Viable range £0 - £20,000	18	18
SWS06	43		Viable range £0 - £20,000	13	13
SWS07	39		Viable range £0 - £20,000	12	12
SWS08	38		Viable range £0 - £20,000	11	11
SWS09	27		Viable range £0 - £20,000	8	8
SWS10	14		Viable range £0 - £20,000	4	4
SWS11	14		Viable range £0 - £20,000	4	4
SWS12	14		Viable range £0 - £20,000	4	4
SWS13	14		Viable range £0 - £20,000	4	4
SWS14	13		Viable range £0 - £20,000	4	4
SWS15	13		Viable range £0 - £20,000	4	4
SWS16	12		Viable range £0 - £20,000	4	4
SWS17	10		Viable range £0 - £20,000	3	
SA8		914			
SD02	428		Not Viable	43	0
SD03	190		Not Viable	19	0
SD05	85		Not Viable	9	0
SD06	55		Not Viable	6	0
SD07	34		Not Viable	3	0
SD08	33		Not Viable	3	0

Site	Capacity	Policy Total Dwellings	Viability - Developer Contributions at Varied Affordable Housing Policy Scenario	Affordable delivery - Policy Compliant	Affordable delivery with developer contribution
SD09	33		Not Viable	3	0
SD10	18		Not Viable	2	0
SD11	14		Not Viable	1	0
SD12	14		Not Viable	1	0
SD13	10		Not Viable	1	0
SA9					
CH01	14	24	Not Viable	1	0
CH02	10		Not Viable	1	0
	27,229	27229		3262	808
Not viable	24,526				
Viable	2,703				

- d) The strategy over concentrates development in a single location which results in an under delivery of family homes and specialist accommodation and does not provide for the range of housing contrary to NPPF paragraph 62.
- 5.11 The proposed strategy is in effect just a continuance of what has been occurring within the city in the last two decades despite the zoning in the 1998 UPD.
- 5.12 The results of this strategy are therefore known and easy to predict by considering the past pattern of provision.
- 5.13 The table below illustrates the levels of recorded gross dwelling completions in Sheffield as set out in SCC Housing Completions Report (August 2019) and Fact and Figures Documents.
- 5.14 Over the last 5 years 75% of all dwellings delivered in the city were apartments or student clusters only 25% of the supply were traditional houses.

Table 2. Gross Completions in Sheffield by Housing Type (2015-2020)

	Apartments, maisonettes, student cluster flats		Houses and bungalows		Total
	Gross completions	%	Gross completions	%	Gross completions
2015/16	1,253	77%	368	23%	1,621
2016/17	1,825	74%	633	26%	2,458
2017/18	1,727	72%	659	28%	2,386
2018/19	1,388	69%	612	31%	2,000
2019/20	2,430	78%	671	22%	3,101
Total	8,623	75%	2,943	25%	11,566

Source: HELAA and Site Schedule 2020

- 5.15 Over the last 5 years only 11% of all dwellings delivered where 3 bed houses (just 241 dpa) and just 8% of all completions were 4+ bed houses (177 dpa).
- 5.16 In respect of the nature of existing demand the Councils SHMA 2019 Table 8.1 suggest that the majority of households (80%) are wishing to access houses rather than apartments (20%) as shown in the table below.

Table 3. Demand for Dwellings by size, type and tenure

	Sheffield	Dwellings
Overall Housing requirement		2200
Dwelling Size		
One bed	12%	264
Two bed	27%	594
Three bed	45%	990
Four + bed	16%	352
Dwelling type		
Flats / apartments	20%	440
Terraced	18%	396
Semi- detached	35%	770
Detached	31%	682
Tenure		
Owner occupation	67%	1474
Social rented / affordable rent	18%	396
Private rented / other rent	15%	330

Source: SHMA 2019 Table 8.1

- 5.17 Comparing the past delivery of dwellings with the demand for dwelling by size and type in the SHMA 2019 suggests that there has been an oversupply of apartments and a under supply of dwellings.
- 5.18 The table below shows that not only are completions dominated by apartments and student cluster flats but that these completions are also locational concentrated in just two locations City Centre and City Centre West.

Table 4. Location of completions by SHMA Housing Market Areas 2015 - 2020

HMA	House	Apartment	Student Cluster	Total
	2015-2020			
Chapelton/Ecclesfield	0%	0%	0%	1%
City Centre	1%	20%	23%	44%
City Centre West	1%	13%	12%	26%
East	1%	0%	0%	1%
Manor/Arbournhome/ Gleadless	7%	1%	0%	8%
North East	4%	1%	0%	5%
North West	1%	1%	0%	2%
Peak District National Park*	1%	0%	0%	1%
Rural upper Don Valley	0%	0%	0%	0%
South	2%	1%	0%	2%
South East	4%	1%	0%	5%
South West	2%	1%	0%	3%
Stocksbridge and Deepcar	1%	0%	0%	1%
Total	25.45%	39.97%	34.58%	100%

Source: SHMA 2019

- 5.19 The future supply over the next five years also demonstrates similar characteristics to the

recent past supply with only 18% of the projected supply are known to be houses a further 10% being delivered on the Council's brownfield land are presently without plans or planning permission but are assumed to be delivering houses. This leaves the majority of the future supply (72%) over the next five years comprising of apartments (43%) and student cluster flats (24%) as shown on in the table below.

Table 5. Breakdown of 5 year supply by type of dwelling

	SCC 2020/21 to 2025/26	%
Apartments / maisonettes	4,897	43%
Student cluster flats	2,763	24%
Houses and bungalows	2,033	18%
Student cluster flats and Apartments	132	1%
Houses and bungalows and Apartments	421	4%
Brownfield Sites Assumed to be houses	1,135	10%
Total	11,381	100%

Source: HELAA 2020 (where no dwelling type identified assumption is that it will deliver housing not apartments or Student accommodation)

- 5.20 In conclusion in the last 5 years, new supply has a predominance (74%) of apartments and purpose-built student accommodation, with 'traditional' houses making up just 26% of gross completions. Over the last five years, three quarters of all dwellings completed were apartments, maisonettes (43%) or student cluster flats (32%).
- 5.21 This is against a demand for 80% housing and 20% apartments.
- 5.22 There is also a locational concentration of completions with 70% of completions occurring within just two of the SHMA Market Areas of City and City Urban West.
- 5.23 Both the Council's report and our analysis highlight the mismatch between locational and typological needs and supply. Put simply the supply that exists for the next 5 years, as well as the delivery that has taken place, is very largely of the wrong type and in the wrong place.
- 5.24 The distribution of allocation in the Plan continues this concentration and as such very similar types and tenure of property are likely to be delivered as have in the past in these locations. The table below highlight the distribution of allocations in the plan as per SP2.

Table 6. Distribution of allocations.

	Total	Percentage
CA1	2743	11%
CA2	1849	7%
CA3	3998	16%
CA4	2101	8%
CA5	6095	24%
CA6	1495	6%
SA2	1005	4%
SA3	801	3%
SA4	2899	11%
SA5	1607	6%
SA6	760	3%

Total	25353	100%
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- 5.25 The table above demonstrates that the Council have not identified allocations to meet the need for family housing but are continuing their previous approach which has resulted in recent past provision and future supply being largely restricted to locations in the City Centre and City Centre West, predominantly for student accommodation and one and two bed apartments.
- 5.26 The proposed distribution of future allocations as described in SP2 and illustrated in the table above will continue to promote development in locations City Centre and City Centre West which will predominantly deliver apartments and student clusters leaving a considerable level of unmet need for family and specialist housing for older persons.
- 5.27 This is in the context where 80% of the demand is for houses rather than apartments. In these circumstances the release of family housing that will be achieved by the residents of the application “rightsizing” is a legitimate material consideration for the decision maker capable of attracting significant weight.

6.0 OBJECTION TO THE INTEGRATED IMPACT ASSESSMENT (IIA) REPORT DECEMBER 2022

- 6.1 The IIA demonstrates that it is possible to identify specific sites to meet the minimum housing requirement as set by the Standard Method. As highlighted by our objection to the IIA the approach taken does not allow for the contribution that could be made from smaller non-strategic sites released from the green belt. A site size of 1,000 dwellings was set at the beginning of the assessment. If there was no size criteria this would increase further the selection of sustainable and deliverable sites. The site at Moor View Driving range would accommodate less than 1000 units, although a 4 hectares, is capable of delivering a quantum of housing well in excess of over 100 units.
- 6.2 In terms of the IIA it is appropriate to note that this only considered the release of strategic sites from the Green Belt but there is the potential to release smaller sites from the Green Belt which would be no less sustainable in terms of their relationship to services, facilities and public transport routes than some of the employment areas that the Council are encouraging to be redeveloped for housing. The inclusion of these smaller sites would increase the choice from which the Council could select suitable and deliverable sites to meet the housing need.
- 6.3 In passing it is worth noting that the approach of setting a minimum size of Green Belt site as part of a Green Belt assessment to consider suitable site for release was found unsound by the inspectors at the St Albans Local Plan examination.
- 6.4 In summary therefore the IIA could have assessed a greater range of Green Belt sites as limiting the assessment to 1,000 dwellings is unsound as smaller sites maybe be just if not more sustainable. The implications of this is that there is we would submit a wider range of potential Green Belt sites that could be released without causing high harm to the Green Belt function in order to meet the minimum level of housing need and this would represent a further reasonable alternative to those considered in the IIA.

Assessment of Site at Moor view Driving Range

- 6.5 The IIA has dismissed all sites under 1000 residential units. This approach is criticised above.
- 6.6 It is noted that the site at Moor view driving range was assessed applying the 4 criteria set. The findings from the IIA are as follows:
- Landscape Sensitivity – No effect
 - Biodiversity – No effect
 - Flood Risk – No effect
 - Green Belt Function – No effect
- 6.7 Given this assessment, it s clear that the site at Moor View Driving range does not offer any insurmountable challenge to the delivery of much needed housing and as such should be objectively considered as a suitable option for housing given the substantial need required which has been overlooked as part of this plan process.

7.0 GREEN BELT REVIEW

- 7.1 As part of the overall Local Plan evolution, the LPA have conducted a Green Belt Review
The Moor View Driving Range has been assessed as part of a wider parcel of land (GB-2) which encapsulates much of the Beauchief conservation area, Abbeydale Golf Club and Beachief Park.
- 7.2 The Green Belt Assessment also undertook a scoring system to assess the overall value of function performed by the current policy allocation. The scoring system applied is as follows:
- Prevent Neighbouring towns merging - 1 pointy
 - Prevent unrestricted sprawl of built-up areas – 1 Point
 - To assist safeguarding the countryside from encroachment – 5 points
 - To encourage urban regeneration and recycling of land – 5 points
- 7.3 Effectively, the Moor View Driving Range site scored 12 points in total
- 7.4 However, 2 of the point scoring assessments are disputed.
- 7.5 **To assist safeguarding the countryside from encroachment** – The site is clearly bound by housing on 2 sides and only separated from a substantial urban area to the west (Bradway) by public playing fields. The site is separated from the land to the north which falls away into to Sheaf Valley and is physically defined by a clear woodland edge. To suggest this is countryside is unreasonable as it clearly offers distinct urban characteristics in terms of built form, operations on site, nature of activities undertaken and associated physical infrastructure (i.e. lighting pollution/physical features on site and provision of clearly demarked boundary fencing). This site shares little in common with surrounding woodlands, mature landscapes and open agricultural land. To suggest any development would encroach upon countryside and offer 5 point in the overall assessment is optimistic and the score should be lowered to a maximum of 3.-
- 7.6 The second area of comment relates to **the recycling of land and failing to encourage urban regeneration**. The site already contains engineered land forms, hard surfaced car parking areas, a range of built form and urban features. It is effectively brownfield land located within the confines of an urban area. Regenerating brown field sites is encouraged and the sustainability credential of the site have already been highlighted. Again, the points allocated to the site as part of the Green Belt review are excessive and again a figure of 3 points is deemed appropriate.
- 7.7 In the event that the overall score allocated to the Moor View Driving Range site is reduced to by 4 points would lead to an overall score of 8, precisely the same as the Norton Aerodrome which is being released from the Green Belt to meet housing needs.
- 7.8 It is also noted that the Norton Aerodrome is only capable of accommodated some circa 270 units and hence is not a strategic location as specified by the IIA (see above).
- 7.9 Conclusion - In the interest of consistency and the delivery of sustainable housing within the

confines of the urban area, the site at Moor View Driving Range should be allocated as a **Housing Site** if the findings of the Green Belt study are to be considered fairly and objectively; together with the assessment of the !!A and the overall evidence of suitable site sites and strategic need.



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