

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

Respondent details

Comment ID number: PDSP.076.002

What is your Name: nineteen47!

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

nineteen47

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:

Sheffield Technology Parks Ltd

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 4: Sheffield's Sub-Area Strategy

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

N/A

Representation

Do you consider the Local Plan is legally compliant: Yes

Do you consider the Local Plan is sound: No

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

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

The Plan is unsound for the reasons set out in our representation on behalf of Sheffield Technology Parks and submitted to the council 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:

The modifications required to ensure the soundness of the plan are set out in our representation on behalf of Sheffield Technology Parks and submitted to the council 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:

In order to present evidence and cross-examine the council on the points raised in our representation.

From: [Redacted]
To: [Redacted]
Cc: [Redacted]
Subject: Sheffield Local Plan - Representation on behalf of Sheffield Technology Parks
Date: 20 February 2023 22:51:55
Attachments: [image001.jpg](#)
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[image006.jpg](#)
[image007.png](#)
[Local Plan Representation - Sheffield Innovation Spine.pdf](#)

Dear Sir/Madam,

Further to the online submission made on behalf of our client Sheffield Technology Parks, please find attached our full and complete representation in response to the draft Local Plan regulation 19 consultation.

We would be grateful of acknowledgement of receipt.

Thanks

Clare

Clare Plant

Director



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CHARTERED TOWN PLANNERS
& URBAN DESIGNERS

Representation to the
Sheffield Local Plan
Preferred Options Consultation
(Regulation 19)

Sheffield Innovation Spine

On Behalf of
Sheffield Science Park Co Ltd

Client:

Sheffield Science Park Co Ltd t/a Sheffield Technology Parks

Project:

Sheffield Innovation Spine

Report Title:

Sheffield Local Plan Representation

nineteen47 Reference:

n2102

Date:

February 2023

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SECTION 1: INTRODUCTION

- 1.1 nineteen47 is instructed by Sheffield Science Park Co Ltd t/a Sheffield Technology Parks (STP) to provide representations in response to the Sheffield Local Plan Preferred Options Consultation (Regulation 19 stage).
- 1.2 STP is working with partners including the University of Sheffield (UoS) to deliver a new 'Sheffield Innovation Spine' (SIS). The SIS will create a world class innovation district within the City Centre, providing a focal point for investment and growth, and complimenting the already successful Advanced Manufacturing Park (AMP) and Advanced Manufacturing Innovation District (AMID), which are located elsewhere in the City.
- 1.3 The SIS offers the opportunity to provide sustainable, high-quality innovation-led employment opportunities near to emerging city centre neighbourhoods. As the plan anticipates the delivery of approximately 20,000 new homes in the City Centre, it is crucial that associated employment opportunities are provided in appropriate locations to support the sustainable '20 minute neighbourhood' aspirations of the Plan.
- 1.4 Section 2 of this representation will outline how the SIS has evolved to date and which area of the city centre it includes, as well as the associated benefits that it can bring to support the objectives of the Local Plan.
- 1.5 Section 3 will then confirm STP's overarching support for the principles and objectives of the Plan, and a strong encouragement for its early adoption, in order to provide a clear vision for future investment in the City.
- 1.6 Several specific objections and recommendations are also set out within Section 3, in response to certain policies as currently drafted. The recommendations provided are not intended to disrupt the plan-making process but to ensure that the final policies are robust and supportive of the aspiration of the plan to ensure its soundness in accordance with the National Planning Policy Framework (NPPF).
- 1.7 In particular, the recommendations presented herein will ensure that the employment targets for the city centre, as set out in the plan, are appropriately targeted to capture investment and growth opportunities that already exist in the innovation sector. This approach will also ensure the continued success of the advanced manufacturing and innovation sector elsewhere in the City through a co-ordinated strategy.

SECTION 2: SHEFFIELD INNOVATION SPINE

- 2.1 The 'Sheffield Innovation Spine' (SIS) provides the opportunity to deliver a distinctive incubation and innovation zone within the City Centre. The SIS has emerged in response to STP's experience of the acute demand for innovation and laboratory space in Sheffield.
- 2.2 STP has operated in the City since 1988 and supports a high calibre of spinout businesses within the innovation sector. These businesses provide skilled, high income jobs with companies who wish to cluster in the city centre close to the universities. The current lack of city-centre incubation and scaleup space restricts the potential growth of this important sector of the economy. Spinouts and other innovation-led businesses currently face pressure to leave Sheffield for other cities that have created 'knowledge quarters' or 'urban innovation districts' that can support these companies to rapidly scale their scientific operations.
- 2.3 This impacts not only further investment and talent retention in the sector, but also fails to capitalise on potential collaboration between city centre businesses, in the manner that has been successfully achieved at AMID and AMP on the outskirts of the City.
- 2.4 The University of Sheffield has invested significant funding in innovation and spinout incorporations and this has resulted in a significant increase in spinout organisation formation rates in the City. This has in turn led to collaboration with other universities across the north, raising further funds to be invested in emerging spinout companies in the region.
- 2.5 Consequently, STP have partnered with the University of Sheffield to develop the 'Sheffield Innovation Spine'. The objective is to provide a world class zone of specialist facilities to attract growth and further investment in the sector. The collaboration between STP and UoS, as well as ongoing discussions with other partners, will encourage targeted economic growth in the City, supported by the emerging talent pools provided by both institutions.
- 2.6 Importantly, in relation to AMID and AMP, the SIS will provide complementary city centre space for businesses at a local level. This will support the continued success of these well-established research and innovation locations outside of the city centre, which already play an important role in the City Region and beyond. The overarching aspiration is that these complimentary zones will secure mutually beneficial investment and will provide a range of space to meet occupier demand.
- 2.7 Nationally and internationally, the designation of inner-city innovation hubs is recognised as an important mechanism for not only delivering increased investment, but also to support brownfield regeneration aspirations and sustainable development objectives.
- 2.8 There are several successful examples of innovation zones elsewhere in the UK including the Oxford Road Corridor, Liverpool Knowledge Quarter and Newcastle Helix.

Oxford Road Corridor - Located in central Manchester, the ORC is a world-class knowledge quarter specialising in research, innovation and education. The corridor balances a diverse mix of culture and business to attract a variety of users.

Knowledge Quarter Liverpool – Through collaboration with the city region’s key partners, KQ Liverpool delivers and supports the growth of new innovative businesses whilst promoting investment programmes and collaboration with Liverpool’s universities.

Newcastle Helix – Located in central Newcastle, Helix is a hybrid innovation district which combines business, homeowners and leisure to prioritise the user.

- 2.9 The above areas have delivered focused opportunities for employment-led development, driving investment into high quality, growing businesses as well as delivering comprehensive and co-ordinated urban regeneration.

The SIS Location

- 2.10 The SIS focuses on the Broad Lane/Tenter Street corridor in the north west of the city centre. It extends from the University campus at Brook Hill, to the emerging West Bar Square development on the edge of the ring road, adjacent to Kelham Island, as shown in Figure 1.

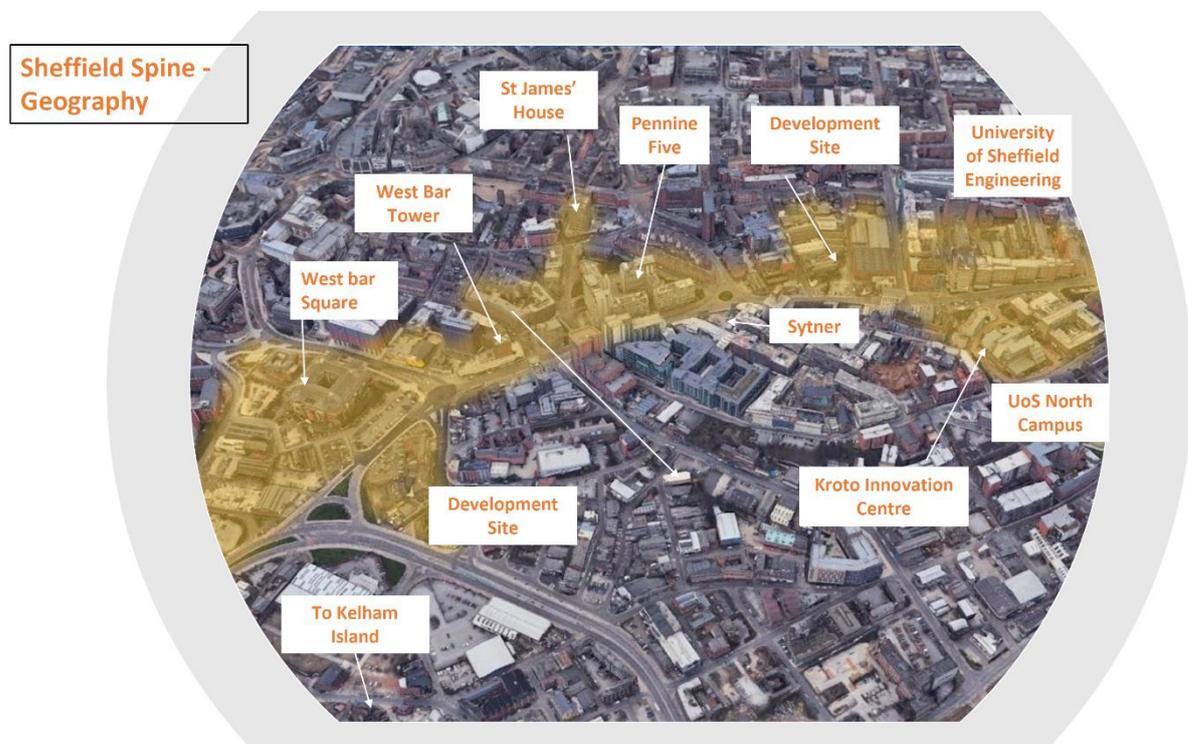


Figure 1: Sheffield Innovation Spine

- 2.11 On the whole, this area has historically been subject to piecemeal development and has lacked a co-ordinated approach to urban design. There are a range of land uses within the area including residential and commercial development, as well as a number of surface level car parks.
- 2.12 The Brook Lane-Tenter Street route was downgraded in highways terms several years ago, following the completion of the inner ring road, and the area lacks a cohesive identity, despite providing a number of important connections through the city centre.

- 2.13 At the western end of the zone on Broad Lane, UoS has already delivered the Diamond building and the Kroto Innovation centre, which are well-established technological and engineering research centres.
- 2.14 This area also includes a number of other teaching buildings and student accommodation blocks. However the street frontage between these buildings is blighted by low quality spaces including surface car parks and empty or under-used buildings leading towards Townhead roundabout.
- 2.15 Within the central section of the SIS, there are a number of modern student developments and several unimplemented planning permissions for residential-led uses of up to 27 storeys in height. This provides an indication of opportunities for densification in this area, in line with the emerging Local Plan.
- 2.16 To the north of Tenter Street is the Vincent Quarter and Sub-Area 3 as identified in the Draft Local Plan. Whilst the area is historically industrial in nature, there have recently been a large quantum of residential and office accommodation delivered, and this area is now the focus for delivery of a new neighbourhood through the emerging Plan. SIS provides the opportunity to deliver direct high quality connections and employment opportunities between the St Vincents Quarter and the city centre.
- 2.17 To the south of Tenter Street, the Pennine 5 development has recently been refurbished for commercial use and offers the opportunity to act as a further catalyst site for the SIS. Pennine 5 contributes a significant amount of Grade A employment floorspace and is currently being modernised to meet current demand. STPs are aware of demand for lab space, which cannot be accommodated elsewhere in the city centre and are in discussion with the operators to determine whether this site can form a catalyst site for the SIS.
- 2.18 To the east of Pennine 5 at West Bar, is the derelict Weston Tower and further surface level car parking, which provide opportunities for further development to support the enhancement of this area and enhances connections through to the emerging West Bar Square development and Kelham Island.

The Benefits of SIS

- 2.19 By 2030, the SIS could deliver a commercial zone which unifies this currently disparate part of the city centre, providing physical regeneration, as well as world class innovative space.
- 2.20 **In economic terms**, an increase in specialised employment roles will support the ambitions of the Local Plan for economic growth, through a concentration of skills. The spinout companies locating within the SIS can support the success of other innovation areas at AMID and in other locations, and work collectively to enhance the innovative economy in Sheffield.
- 2.21 The University of Sheffield already acts as a catalyst for innovation with existing facilities at the western end of the spine. The remainder of the spine area includes a number of potential development sites, with opportunities for densification of uses supported by existing services within the area such as shops and hotels.

- 2.22 If the population of the city centre is increased in line with the Local Plan aspirations, it is vital that the provision of skilled employment opportunities is also considered and supported by local plan policies, to provide sustainable neighbourhoods for new residents.
- 2.23 **In environmental terms**, the SIS offers the opportunity to secure cohesive physical regeneration and unification of this part of the city centre, providing an attractive identity for the area and stronger connections between emerging neighbourhoods.
- 2.24 To date, the evolution of this area has been largely unplanned, however there are significant opportunities to provide co-ordinated development going forward and deliver important connections between the city centre and areas such as the West Bar development, the St Vincents neighbourhood and Kelham Island.
- 2.25 A co-ordinated approach to regeneration and investment in this area also offers the opportunity to link existing spaces, and to extend successful city centre initiative including the Grey to Green route, to provide new green and blue infrastructure.
- 2.26 **In social terms**, the creation of successful 20 minute neighbourhoods, where homes are within sustainable travel distances of employment opportunities, cannot be achieved by focusing on residential development only.
- 2.27 The provision of high-quality employment opportunities within the city centre will encourage residents to frequent other areas of the city centre, supporting local businesses and enhancing the vitality of public spaces.
- 2.28 Importantly, innovation-led employment uses can be provided as part of mixed-use development, as demonstrated in other cities, offering continued support for the City's housing targets, whilst delivering complimentary employment generating spaces.

SECTION 3: REPRESENTATIONS ON PROPOSED POLICIES

- 3.1 Within the context of Section 2 of this representation, this Section considers the content and draft policies set out within the Preferred Options document.
- 3.2 In accordance with paragraph 35 of the National Planning Policy Framework (NPPF), local plans must be considered against the four tests of soundness, which are as follows:
1. *Positively prepared* – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 2. *Justified* – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 3. *Effective* – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 4. *Consistent with national policy* – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.
- 3.3 STP supports the broad objectives of the draft plan in relation to growth aspirations, including a focus on the Central Sub-Area as the heart of the future transformation in Sheffield. In order to ensure that this vision is successful, we raise several **objections** to the plan as currently draft and make recommendations to ensure that the plan is sound, in accordance with the above tests.
- 3.4 Aim 4 of the Local Plan outlines the desire for better quality jobs, specifically those which offer a competitive advantage to Sheffield’s economy; a desire for sufficient locations for new modern businesses and support the growth and development of the city’s educational facilities to enable an increase in skills. Whilst this aim indicates a desire to modernise the employment space with direct reference to innovation-led growth, the opportunity to make specific provision for a concentrated city centre zone is missed in the plan as drafted.
- 3.5 Within the draft Plan, the SIS area is not formally identified and the area comprises a number of different policy zones. These include the Central Area Flexible Use Zone (Policy VC3 - centre of the SIS), a Residential Zone (Policy CA3 - north of Tenter Street) and the University/College Zone (Policy EC8 - western end of the spine). There are also several specific policy allocations applied to sites within the SIS, primarily identifying residential development opportunities for approximately 466 dwellings.
- 3.6 The Flexible Use and University zones state a range of preferred and acceptable uses which include Commercial, business and service uses and are therefore broadly supportive of the accommodation that may be delivered within the SIS. Whilst we do not recommend

amendments to these area designations, other modifications are proposed below to support the delivery of the SIS.

Draft Local Plan Policies

Policy SP1: Overall Growth Plan

- 3.7 Policy SP1 sets out the growth strategy for Sheffield, promoting growth which delivers homes, jobs, employment floorspace, infrastructure and community facilities to meet Sheffield's identified needs.
- 3.8 The Sheffield Employment Land Review (2021 update) at paragraph 2.16 identifies that in accordance with National Planning Policy Guidance (PPG), when assessing what land and policy support may be needed for different employment uses, it will be important to understand whether there are specific requirements in the local market which affect the types of land or premises needed:
- "Clustering of certain industries (such as some high tech, engineering, digital, creative and logistics activities) can play an important role in supporting collaboration, innovation, productivity, and sustainability, as well as in driving the economic prospects of the areas in which they locate. Strategic policy-making authorities will need to develop a clear understanding of such needs and how they might be addressed taking account of relevant evidence and policy within Local Industrial Strategies. For example, this might include the need for greater studio capacity, co-working spaces or research facilities. These needs are often more qualitative in nature and will have to be informed by engagement with businesses and occupiers within relevant sectors."*
- 3.9 As set out in the earlier sections of this representation, STP and partners have direct experience of the unmet need that exists for innovation-led space in Sheffield city centre. The ELR report suggests that the inclusion of 'destination' mixed-use developments (including employment provision) would act as a catalyst of activity across a range of sectors. The report also identified the opportunity to create stronger linkages with the two universities and a growing number of businesses to deliver high quality employment opportunities.
- 3.10 Policy SP1 at d) allocates the Central Sub-Area and Advanced Manufacturing Innovation District (AMID) as priority locations for economic growth. Although further policy is specifically included (Policy EC1) regarding AMID, there is no detailed policy setting out how the Central Sub-Area could include a similar concentration of spaces to support a growth in this sector.
- 3.11 The co-location of such space within SIS will support the provision of focused employment opportunities. By contrast, the locations that are identified within the draft plan for city centre employment uses are dispersed across the central area, in locations which are already focal points for such uses (notwithstanding the comments made below in relation to Policy CA2A(d)).
- 3.12 In addition, whilst the Central Sub-Area includes a number of Character Areas and neighbourhoods where co-ordinated residential-led development is planned, there is limited consideration of the areas between these zones and their importance in forming connections

between areas. As a result, opportunities to support high quality design policies along key routes and networks are missed, contrary to the aspirations of policies CO1 and GS1.

- 3.13 We **object** to SP1 as drafted and recommend the following modification to ensure the soundness of the plan.

Recommendation – Locations of economic development

Part d) of Policy SP1 to include reference to the Sheffield Innovation Spine as a priority location for economic growth.

- 3.14 The plan should identify the area included within the SIS as a priority area for the technology and innovation sector, delivered through purpose-built employment or mixed-use accommodation.
- 3.15 The plan as drafted does not provide a focused and clear strategy for employment-led investment in the city Centre. The modified approach, including reference to the SIS, will provide a focus for high quality employment, whilst maintaining general employment uses in established zones elsewhere in the centre.
- 3.16 The identification of the SIS within the Local Plan will also act as a catalyst for place-based regeneration. Presently, the area is located between focus character areas and neighbourhoods within the draft plan. The SIS would provide a co-ordinated focus for further development, which will integrate positively within existing uses, likely to be retained within the area, creating a defined sense of place, supported by the residential, cultural and educational uses already in the area.

Policy EC1: Development in the Advanced Manufacturing Innovation District (AMID)

- 3.17 Policy EC1 sets out the importance of the AMID with regard to the city and importantly the city region's economic strategy. It is recognised that the district provides a unique opportunity to deliver economic development specifically in the industries of advanced manufacturing and advanced health & wellbeing, which utilise the expertise of the two universities in Sheffield.
- 3.18 Whilst this approach is supported, in light of the above recommended modifications, the plan should identify the linked opportunities for employment creation of high-quality space within the City Centre. The character of the AMID area focuses on employment-led development, and the provision of additional accommodation to support sector growth within the city centre supports opportunities for additional investment, mixed use development and creates walkable employment opportunities for local residents.
- 3.19 Policy EC1 fails to identify the SIS including potential conjoined benefits of this city centre area in combination with the established AMID area. We therefore **object** to EC1 as drafted and recommend the following modification to ensure the soundness of the plan.

Recommendation - Acknowledgement of the Sheffield Innovation Spine

- 3.20 **Policy EC1 should acknowledge the location of the Sheffield Innovation Spine and confirm its ability to support the growth of the AMID.**

- 3.21 The SIS presents an opportunity to support a range of innovation-focused economic development opportunities, which will complement the ambitions of the AMID.
- 3.22 In line with the sentiments outlined in Policy EC1, the SIS will also support regeneration and place-making within the city centre, which is unlikely to be achieved based on the current strategy of ad hoc development.
- 3.23 Most importantly, the plan will define the linked economic development opportunities offered by established and emerging innovation areas, which will enable incoming investors and organisations to see the policy support for development in these defined locations.

Policy EC2: Development in the City Centre Office Zones

- 3.24 Policy EC2 indicates 5 zones within the Sheffield City Centre Ring Road where offices should be the dominant use. Whilst it is understood this policy is seeking to preserve existing office uses within these defined zones, the policy does not suitably identify a zone sufficient space for new high quality employment space and therefore is not considered justified.
- 3.25 The policy acknowledges the Employment Land Review's conclusion regarding the need for more office space and the potential for this to be delivered in the city centre. However, this is not reflected in the employment zones indicated within the policy, which highlight areas of largely existing office development, which the ELR concludes is not entirely suitable to meet future employment space demand. We therefore **object** to Policy EC2 as drafted and recommend the following modification.

Recommendation – Inclusion of Sheffield Innovation Spine

- 3.26 **Policy EC2 should acknowledge the potential of the Sheffield Innovation Spine to contribute to the creation of new employment space within the City Centre.**
- 3.27 The plan should make clear that although the SIS will not be identified as an office area, it will form the focus for supportive and high quality employment generating space, in addition to traditional office provision elsewhere in the city centre.
- 3.28 This modification along with other recommendations made herein, will ensure that the policy meets future employment requirements in a sustainable manner and provides a coordinated approach to delivery of high-quality and specialised jobs within the innovation sector, securing the benefits of collaborative working and focused investment that such areas provide.

Policy CA2A: Priority Location in Castlegate

- 3.29 Policy CA2A part C, makes reference to aspirations to deliver a new innovation district connecting Castlegate to the Wicker. There is no further detail provided as to how this area might be delivered, nor an indication of existing innovation uses that could form the catalyst for further development in this area.
- 3.30 By contrast the SIS is anchored by existing innovation facilities within the main UoS campus and is largely unconstrained by heritage assets and other physical constraints, which are present in the castlegate area.

- 3.31 It is considered in the long term that wider connections can be provided from the eastern end of SIS towards Castlegate, however SIS offers substantial opportunities and benefits in terms of delivery in the short term as set out within this representation.

Recommendation – Deletion of Castlegate Innovation Zone

Policy CA2A part C should be deleted.

- 3.32 The justification for this approach is based on the evidence of opportunities and benefits arising from the SIS as set out within this representation.

Policy CA3: St Vincent's, Cathedral, St George's, University of Sheffield.

- 3.33 Policy CA3 identifies the St Vincent area as one of three character area within the Central Sub-Areas defined in Part 1 of the Draft Local Plan. This area is located adjacent to the SIS and therefore it is considered appropriate for the plan to acknowledge the benefits that can be provided by this co-location and the connections that the SIS can provided from the City Centre to this area.
- 3.34 Policy CA3 seeks to deliver a predominantly residential area with a focus on liveable city centre neighbourhoods. In the interest of sustainable development and 20-minute neighbourhoods, it is important to consider where the occupiers of these dwellings will work, and likewise, where the employees of the SIS would live.
- 3.35 On this basis, the plan falls short of providing considered spatial strategies to connect the character areas. We there **object** to Policy CA3 and recommend that the policy is amended to make reference to the opportunities offered by the neighbouring Sheffield Innovation Spine. This is to ensure a co-ordinated approach to the Central Sub-Area.

Policy AS1 – Development on Allocated Sites

- 3.36 Policy AS1 sets out that on allocated sites, including housing sites, where a specific use is required, this use should cover at least 80% of the site area.
- 3.37 There are several sites within the SIS, which although within a Flexible Use policy zone, are identified specifically as residential allocations. These include sites reference SU13,14,19, 24, 26, 40 and 41. This designation could not only limit the success of the area as a focus for innovation-led employment opportunities but also constrain the efficient use of these sites for mixed use development.
- 3.38 This policy wording in relation to the proportion of housing required on each site is also problematic, in terms of its application on city centre sites. In such locations, although the site footprint may be limited but the potential height of the building may be significant and the direct application of the policy as worded could restrict the delivery of mixed use schemes in cases where additional height (over and above that anticipated in the development yields) can be demonstrated to be acceptable.
- 3.39 We therefore **object** to this policy on the basis it will not be effective in delivering the overarching aspirations of the plan.

Recommendation – Modify housing allocations to mixed use allocations

The site allocations (referenced in paragraph 2.34) included within the SIS should be modified to become Mixed Use allocations.

Or if this approach is not supported then

Policy AS1 should be modified to allow the proportion of the preferred use within city centre sites to be departed from, where circumstances support provision of the anticipated yield of housing on the site (or overprovision has occurred on neighbouring sites) to support alternative uses as part of a mixed use approach.

- 3.40 This approach would deliver both housing objectives as set out in the draft plan, and the objectives of the SIS and create a liveable and vibrant neighbourhood.
- 3.41 The modification suggested will ensure that the plan is effective and positively prepared, including ensuring that identified housing target can be met whilst capturing the benefits that cohesive mixed-use development can bring to the area.

SECTION 4: CONCLUSION

- 4.1 This Local Plan Representation has been prepared by nineteen47 for Sheffield Technology Parks Ltd in response to the Sheffield Local Plan Preferred Options Consultation.
- 4.2 STP supports the overarching objectives of the Local Plan and its expedient adoption to provide certainty in terms of the future strategy for the growth of the City.
- 2.29 However, for the reasons set out in this representation, it is considered that the employment strategy in the draft plan requires modification to ensure that it meets the economic growth objectives and captures the significant opportunities presented by innovation-based employment growth in the city centre. This will ensure that Sheffield is not overlooked as a location for inward investment.
- 4.3 The inclusion of the SIS will promote a concentrated land use for specialised employment creating an area for collaboration. This will support the wider economic growth of the region including growth in locations including the Advanced Manufacturing Innovation District.
- 4.4 In addition to delivering economic growth and high quality, skilled employment opportunities, the SIS offers the opportunity to deliver substantial social and environmental benefits and will connect the surrounding central sub-areas and support the ambition to deliver new homes in a sustainable manner within the city centre.
- 4.5 We **object** to the absence of references to the Sheffield Innovation Spine within the draft plan and recommend that the plan is subject to the modifications recommended in Section 3 of this representation. This will ensure that the Sheffield Innovation Spine is integrated into the spatial planning and referenced as a potential contributor to the long-term economic growth of the city region.
- 4.6 The recommendations made within this representation, if implemented, will ensure that the Plan is positively prepared, justified, effective and therefore sound in accordance with the Framework.