

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Publication (Pre-submission) Draft Sheffield Plan 2022 (Strata: Townend Lane)
Date: 20 February 2023 17:34:42
Attachments: [image001.jpg](#)
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[image009.png](#)
[image010.jpg](#)
[P4473-SPA-RP-TP-002-B- Local Plan Reprs.pdf](#)
[Appendix 2 - Advocacy Report Low Res.pdf](#)
[Appendix 3 - HMA.pdf](#)

Importance: High

Hi,
On behalf of Strata Homes, please find attached our response to the Pre-Submission Draft Sheffield Local Plan consultation for their site at Townend Lane, Stocksbridge.
We trust that you will confirm that these representations are duly made and will give due consideration to these comments.
Please do not hesitate to contact us to discuss any issues raised in this Representation further.
All the best, Andy
Kind regards
ANDREW ROSE
Associate Director: Chartered Town Planner
BSc (Hons), MSc, PG DIP, MRTPI

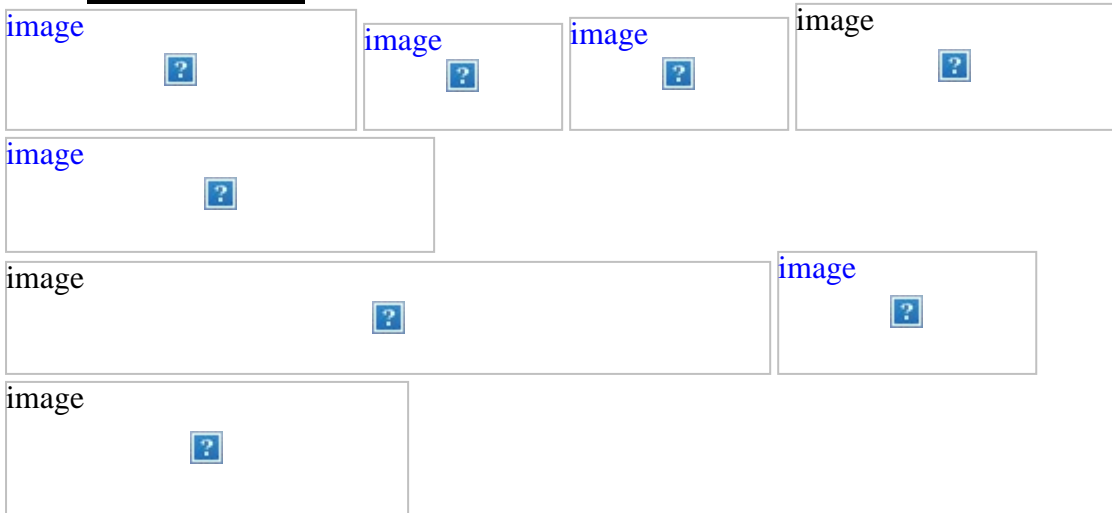


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From: SheffieldPlan <sheffieldplan@sheffield.gov.uk>

Sent: 09 January 2023 10:56

Subject: Publication (Pre-submission) Draft Sheffield Plan 2022

Dear Agent

Publication (Pre-submission) Draft Sheffield Plan 2022

Consultation pursuant to Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

We are preparing a new local plan, which, when adopted, is expected to be called “the Sheffield Plan”. Following public consultation on ‘Issues and Options’ in 2020, the Publication (Pre-submission) Draft Sheffield Plan is now ready for consultation. The Publication Draft Plan represents the Council’s formal proposals on how the city should grow and develop over the period to 2039. It covers the whole of Sheffield except for the part of the city that is in the Peak District National Park. We are asking for comments and feedback on whether the Plan has been prepared in accordance with legal and procedural requirements, and whether it is sound. Plans are sound if they are:

- a) **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;
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework and other statements of national planning policy, where relevant.

The statutory public consultation is available for a 6-week period from Monday 9 January to Monday 20 February 2023. A full **Statement of the Representations Procedure** is attached to this email.

You can read the Publication Draft Sheffield Plan on the [Consultation Portal on the Council’s website](#). You can also view the other supporting documents that we will be seeking comments on, together with other background documents that you may find helpful to refer to.

To make your comments visit the Consultation Portal from 9 January. Please make your comments no later than 11.59 pm on Monday 20 February.

Details of all the consultation events are also available on the Consultation Portal (which can also be accessed from the Council’s website).

Why we are writing to you

We are writing to you as you as a statutory consultee or because you have previously expressed an interest in being kept informed about the new local plan. Consequently, you are on our mailing list of contacts for this group and will have signed up to our ‘terms and conditions’.

The data you give us

Under the General Data Protection Regulation 2016 (GDPR) and Data Protection Act 2018 (DPA) Sheffield City Council is a Data Controller for the information it holds about you. The lawful basis under which the Council uses personal data for this purpose is consent.

All representations are required to be made public and will be published on the Council’s website following this consultation. Your representations and

name/name of your organisation will be published, but other personal information will remain confidential. Your data and comments will be shared with other relevant agencies involved in the preparation of the local plan, including the Planning Inspectorate. Anonymous responses will not be considered. Your personal data will be held and processed in accordance with the Council's Privacy Notice which can be viewed at: <https://www.sheffield.gov.uk/utilities/footer-links/privacy-notice>

How to contact us

If you would have difficulty accessing any of the consultation documents via our website or accessing the Consultation Portal, or you need any further advice or information, please contact us at sheffieldplan@sheffield.gov.uk. You can call us on 0114 2735274.

Please also email us at the above address if you no longer want us to contact you about the Sheffield Plan.

Yours faithfully



Simon Vincent
Strategic Planning Service Manager
Planning Service
Sheffield City Council

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Strata Homes

Sheffield Plan: Publication (Pre-Submission) Draft

Development Plan Representation

Townend Lane, Stocksbridge

February 2023



01 Introduction

Introduction

- 1.1 Spawforths have been instructed by Strata Homes to submit representations to the Sheffield Plan Publication (Pre-Submission) Draft, for their site at Townend Lane, Stocksbridge.
- 1.2 Strata Homes welcomes the opportunity to contribute to the emerging Local Plan for Sheffield and is keen to further the role of Sheffield within the Yorkshire and Humber Region as a whole.
- 1.3 Strata Homes has significant land interests in Sheffield, which can positively contribute towards the housing and economic growth agenda, providing a long term comprehensive approach to the sustainable growth of Sheffield.
- 1.4 Strata Homes would like to make comments on the following topics and sections of the Sheffield Local Plan (Pre-Submission) Draft:
 - General Comments
 - Vision, Aims, and Objectives
 - Policy SP1: Overall Growth Plan
 - Policy SP2: Spatial Strategy
 - Policy SA1: Central Sub-Area
 - Policy SA2: Northwest Sheffield Sub-Area
 - Policy SA3: Northeast Sheffield Sub-Area
 - Policy SA4: East Sheffield Sub-Area
 - Policy SA5: Southeast Sheffield Sub-Area
 - Policy SA6: South Sheffield Sub-Area
 - Policy SA7: Southwest Sheffield Sub-Area

- Policy SA8: Stocksbridge/Deepcar Sub-Area
 - Policy SA9: Chapeltown/High Green Sub-Area
 - Policy H1: Scale and Supply of New Housing
 - Policy ES1: Measures required to achieve Reduced Carbon Emissions in New Development
 - Policy ES2: Renewable Energy Generation
 - Policy ES3: Renewable Energy Networks and Shared Energy Schemes
 - Policy ES4: Other Requirements for the Sustainable Design of Buildings
 - Policy NC3: Provision of Affordable Housing
 - Policy NC5: Creating Mixed Communities
 - Policy NC8: Housing Space Standards
 - Policy NC9: Housing Density
 - Policy GS6: Biodiversity Net Gain
 - Policy GS7: Trees, Woodlands and Hedgerows
 - Policy DC1: The Community Infrastructure Levy (CIL) and Other Developer Contributions
- 1.5 In each case, observations are set out with reference to the provisions of the Framework and where necessary, amendments are suggested to ensure that the Local Plan is found sound.
- 1.6 Strata Homes welcomes the opportunity for further engagement and the opportunity to appear at Examination in Public.
- 1.7 We trust that you will confirm that these representations are duly made and will give due consideration to these comments.
- 1.8 Please do not hesitate to contact us to discuss any issues raised in this Representation further.

National Planning Policy context and Tests of Soundness

- 1.9 The Government's core objectives as established through the 2021 National Planning Policy Framework (the 2021 Framework) are sustainable development and growth. Paragraph 11 of the 2021 Framework stresses the need for Local Plans to meet the objectively assessed needs of an area. The 2021 Framework sets out to boost significantly the supply of homes and ensure that a sufficient amount and variety of land can come forward where it is needed. In terms of building a strong and competitive economy the 2021 Framework states that planning should help create the conditions in which businesses can invest, expand and adapt. The key focus throughout the 2021 Framework is to create the conditions for sustainable economic growth and deliver a wide choice of high quality homes and well-designed places.
- 1.10 In relation to Local Plan formulation, paragraphs 15 to 37 of the 2021 Framework state that Local Plans are the key to delivering sustainable development which reflect the vision and aspirations of the local community. The 2021 Framework indicates that Local Plans must be consistent with the Framework and should set out the opportunities for development and provide clear policies on what will and will not be permitted and where. Paragraph 22 is clear that the Strategic policies should look ahead over a minimum period of 15 year period, and where larger scale development such as new settlements or significant extensions to existing villages and towns form part of the areas strategy, then policies should look ahead over a period of at least 30 years.
- 1.11 In relation to the examination of Local Plans, paragraph 35 of the 2021 Framework sets out the tests of soundness and establishes that:

Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

- **Positively prepared** – providing a strategy which as a minimum, seeks to meet the area's objectively assessed needs¹; and is informed by agreements with other authorities, so that unmet needs from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

¹ NPPF 2021, Footnote 21 – where this relates to housing, such needs should be assessed using a clear and justified method, as set out within paragraph 61 of this Framework

- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with policies in this Framework and other statements of national planning policy, where relevant.

1.12 This document therefore considers the content of the Regulation 19 Sheffield Local Plan on behalf of Strata Homes in the light of this planning policy context.

02 General Comments

General Comments

- 2.1 The Council's approach to the Local Plan is unsound.

Justification

- 2.1 Strata Homes is concerned that the evidence base which supports the Plan appears incomplete and in places lacks clarity. The Framework requires Local Plans to be based on a sound and up-to-date evidence base which identifies a development need and reflects the locational characteristics of the City. It is therefore difficult to comment in depth where there is little supporting information.
- 2.2 Furthermore, as is demonstrated in these representations not all reasonable alternatives have been considered in the preparation of the Local Plan. This could be due to the approach towards decision making on the Spatial Strategy, which does not reflect how Local Plans should be produced.
- 2.3 Local Plans should reflect evidence on employment and housing need and the appropriate Spatial Strategy should be devised that meets those needs. However, this Local Plan is based on a strategy of only meeting the employment and housing needs that can be met within the chosen Spatial Strategy option of the Council and therefore the full needs will not be met as that would take the Local Plan outside of the chosen strategy option.
- 2.4 Climate Change, Economy and Development Transitional Committee were presented Five Spatial Strategy Options on 13th January 2022, as follows:
- Option 1: An urban capacity approach – brownfield only.
 - Option 2: As Option 1 but with previously undeveloped land within the urban area also allocated where this is considered sustainable.
 - Option 3: As Option 1 & 2 plus sustainably located brownfield Green Belt sites.
 - Option 4: As Option 1, 2 & 3 plus release of sustainably located greenfield (previously undeveloped) sites in the Green Belt for development where there are site specific exceptional circumstances to justify altering the Green Belt boundary.

- Option 5: As Option 1, 2, 3 & 4 plus release of sufficient greenfield (previously undeveloped) sites in the Green Belt to meet the full housing need figure, as calculated using the Government's standard methodology.
- 2.5 Each option was accompanied by a maximum number of homes per year that could be delivered through that option. The debate that followed therefore focussed on the type of sites being identified first and meeting the housing needs second. Therefore, Members could not, and did not, make an effective decision on satisfying housing needs through the information presented.
 - 2.6 This approach to decision making is unsound as it is not evidence-led on housing need and does not meet the Government's standard methodology on housing need, which is 2,973 dwellings per annum and is the minimum starting point in determining the number of homes needed in an area.
 - 2.7 Furthermore, the evidence showed that to meet the housing need greenfield Green Belt sites should be released. However, Members focussed on the types of sites and housing only, devised that the Council would not meet its housing need and chose Option 3.
 - 2.8 Option 3 was put forward as it would include two brownfield Green Belt sites. These are mentioned in the Transitional Committee report at para 1.6.12, which states that "there are two large brownfield sites in the Green Belt that adjoin the existing urban area. We estimate that, in total, these sites could have capacity for up to 1,100-1,200 homes but they could also be suitable for employment use. Adding these sites to the supply could enable a housing requirement of up to 2,305 per year (see Appendix)." The two brownfield sites are again mentioned in the Options in the appendix.
 - 2.9 The Cooperate Executive Report of 19th January 2022 goes further in the accompanying Equality Impact Assessment by highlighting the two sites, which are at Norton and Chapeltown. Members therefore took the decision on the preferred Spatial Option in full cognisance that these two sites would be identified in the Plan.
 - 2.10 Ultimately only a portion of the former Norton aerodrome was released from the Green Belt for 280 new homes and fewer homes have been identified than originally suggested through the committee reports, which shows Option 3 could support the potential for circa 2,305 new homes per annum. However, the draft Local Plan is proposing 2,090 dwellings per year, which is below the suggested level for Option 3. The final proposed Plan therefore does not reflect the information that supported Option 3, is providing fewer homes and also does not meet the standard methodology.
 - 2.11 The evidence base shows that the Council has not assessed all sites and therefore Members could not understand what sites would be identified within each option. The information presented as part of the consideration of **Spatial Options is ill informed and unsound.**
 - 2.12 Subsequently, only sites that fit within Spatial Options 3, as perceived by the Council, have been assessed and considered. The consideration of reasonable alternatives has therefore not occurred. **The approach towards the Plan is therefore unsound.**

- 2.13 Paragraph 3.8 states that the housing growth figures reflect the capacity of the existing urban areas and the restrictions imposed by the Green Belt. However, that is not strictly true as the committee reports show that, in accordance with the Framework, the Council could amend the Green Belt to accommodate the housing requirement as exceptional circumstances would have been demonstrated.
- 2.14 The Spatial Strategy on focussing on types of sites has therefore created an unsustainable short term Plan, which is not meeting the identified needs. This view is reinforced through the introductory text to Policy H1, which states in paragraph 5.3 that “sufficient deliverable sites have been allocated to provide a supply for the first five years of the plan period after adoption” and that “a further supply of developable sites will come forward on other sites”. Paragraph 5.4 states that there is insufficient evidence to demonstrate whether some of the developable supply is deliverable and paragraph 5.6 highlights that public intervention will be needed to enable some of the sites to come forward, due to constraints on site and multiple ownerships. We have reviewed the housing supply position and consider the Local Plan is deficient in its provision, which will be explained in response to Policies SP1 and H1.
- 2.15 The Council has therefore clearly chosen a Spatial Option, and identified sites to suit, and not meet the identified housing need. **Strata Homes therefore consider that the basis of the Local Plan is unsound.**

Viability Assessment

- 2.16 Strata Homes have undertaken a review of the HDH Planning and Development Whole Plan Viability Assessment (September 2022), which forms part of the evidence base. The difficulties in undertaking whole district Economic Viability Studies are not underestimated. However, it is important that a level of robustness and rigour of testing of the evidence base is undertaken due to the fundamental importance of this document in underpinning the policy direction for the whole plan period.
- 2.17 Strata Homes note that due to the nature of property market in terms of its cyclical nature and the turbulence of build costs and revenues that any Viability Assessment can only be a point in time and will quickly become out of date. It is therefore clear that the proposed policies need to include more flexibility alongside ambitious demands to enable delivery.
- 2.18 The PPG states that the approach to viability should be: “proportionate, simple, transparent and publicly available”. Further justification is required for several inputs and the raw data on revenues for example should be made available for scrutiny. Strata Homes is concerned that the Appraisal assumptions and evidence base for many inputs are out of date. This should be reviewed and updated, but also highlights the reason for greater flexibility.
- 2.19 Strata Homes would like to highlight issues with some of the assumptions within the Viability Appraisal, for example the costs for abnormals where only an allowance of 5% of the BCIS costs is included and that “abnormal costs will be reflected in land value. Those sites that are less expensive to develop will command a premium price over and above those that have exceptional or abnormal costs”.

- 2.20 As the Council's focus in the Local Plan is on urban brownfield sites appropriate development costs should be incorporated into the Viability Appraisal. The Local Plan already highlights that the deliverability and viability of a number of sites is unknown.
- 2.21 Strata Homes therefore considers that the Local Plan and its evidence base should be updated.
- 2.22 Strata Homes therefore reserve the right to comment further on the Local Plan and policies when evidence and information is provided.
- 2.23 **As currently drafted, Strata Homes consider the Local Plan is unsound.**

Proposed Change

- 2.24 To overcome the objection and address soundness matters, the following changes are proposed:
- Update the evidence, including the Viability Appraisal.
 - Reflect the evidence base within the Local Plan.
 - Consider all reasonable alternatives, including Green Belt sites.
 - Allocate the site at Townend Lane, Stocksbridge for housing use.

03 Vision, Aims, and Objectives

Vision, Aims, and Objectives

- 3.1 The Vision and Objectives do not reflect the economic growth agenda. Furthermore, there is inconsistency between the Spatial Strategy, identification of sites and the Vision and Objectives. The Plan is therefore unsound.

Justification

- 3.2 The Vision is relatively positive. However, there is no mention of housing growth. There are references to “thriving neighbourhoods and communities” and providing “good quality housing offer meeting the needs of different household types and sizes. However, this is particularly vague and does not in turn foster the conditions for “boosting the supply of housing” in accordance with the Framework.

- 3.3 Strata Homes’ main concern is with the drafting and derivation of the Plan. The “Objectives for thriving neighbourhoods and communities” in paragraph 2.12 states:

To create a housing market that works for everyone and which provides quality, choice and affordability.

To ensure Sheffield has an adequate supply of residential development land so the city can meet its requirement for new housing.

- 3.4 Strata Homes considers that the Plan does not reflect this Objective in under providing housing land compared to the identified housing need and not having the range, choice and location of housing sites to cater for creating a healthy housing market.

- 3.5 Strata Homes considers the strategic approach of the Plan is flawed. The sites are available and have been submitted to the Council to deliver an ambitious Plan for an ambitious City. However, the Plan does not reflect the Vision or Objectives as internally inconsistent.

- 3.6 The Sheffield Local Plan is unsound as drafted.

Proposed Change

3.7 To overcome the objection and address soundness matters, the following changes are proposed:

- Update the Local Plan and identify further employment sites.
- Allocate the site at Townend Lane, Stocksbridge for housing use.

04 Policy SP1

Policy SP1: Overall Growth Plan

- 4.1 The Local Plan is not addressing the identified employment requirement and does not reflect the evidence base, national policy and guidance and is therefore unsound.

Justification

- 4.2 Policy SP1 states that the Local Plan will deliver 35,530 new homes by 2039, which is 2,090 new homes per year from 2022 to 2039.
- 4.3 However, this will not meet the identified housing need, which in accordance with the Government's standard methodology is 2,973 dwellings per annum, and is therefore not in accordance with the Framework.
- 4.4 The Framework describes the purpose of the planning system to contribute to the achievement of sustainable development. There are three overarching objectives which are central to the achievement of sustainable development: economic, social and environmental. The economic objective is to '*help build a strong, responsive and competitive economy by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure*'. [paragraph 8, Spawforths emphasis]. Plans are required to be prepared positively and in a way that is aspirational but deliverable, and ensure that strategic policies look ahead over a minimum of 15 years from adoption in order to anticipate and respond to long term requirements and opportunities such as those arising from major improvements in infrastructure. Strategic policies include the scale and quality of development and making sufficient provision for housing (including affordable housing), employment, retail, leisure and other commercial development alongside infrastructure, and community facilities.
- 4.5 The Framework is clear that to be considered positively prepared and therefore 'sound' the plan must, as a minimum, meet the Plans objectively assessed needs [NPPF, Paragraph 35].
- 4.6 The Government are committed to boosting the supply of homes and ensuring that a sufficient amount and variety of land can come forward where it is needed, and that the needs of groups with specific housing requirements are addressed. [NPPF, paragraph 60].

- 4.7 The Plan is also expected to create conditions in which businesses can invest, expand and adapt, which requires a clear economic vision and strategy which positively and proactively encourages sustainable economic growth. There should be significant weight on the need to support economic growth and productivity. Plans are required to be flexible enough to accommodate needs that have not been anticipated within the plan. [NPPF, Paragraphs 81 and 82].
- 4.8 The Framework states in paragraph 61 that:
- To determine the minimum number of homes needed, 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 which also reflects current and future demographic trends and market signals*
- 4.9 The Planning Practice Guidance (PPG) states that it is expected that the standard method be followed for assessing housing need. The PPG states that the standard method is not mandatory but any other approach will be scrutinised more closely at Examination and there will need to be exceptional circumstances.
- 4.10 As stated within General Comments, Strata Homes does not consider that exceptional circumstances have been evidenced for an alternative approach. It is clear from the committee reports that the evidence presented showed that greenfield Green Belt sites were required to meet the identified needs, and this would have delivered the desired housing and economic growth aspirations for the Council.
- 4.11 However, the debate focussed on the type of sites and not the evidence or housing need. This does not constitute exceptional circumstances for diverting from the standard methodology for housing as the starting point, which does not allow for affordability, economic growth or the 35% uplift for the top 20 cities and urban centres.
- 4.12 The Committee Report clearly identifies for choosing either Option 4 or Option 5, which are:
- Increase the viability of key strategic infrastructure, thereby enabling it to be delivered, in particular new passenger railway lines/stations;
 - Support the expansion of strategic employment areas;
 - Provide land to meet specialist housing needs in a part of the city where there is no other land available.
- 4.13 The benefits continue highlighting providing opportunities to meet a wider range of market areas; delivering a better mix of house types overall; viability is less of a problem on greenfield sites; enable more affordable homes; support investment in new rail infrastructure such as the Barrow Hill line and Upper Don Valley; and the amount of housing land would be closer to the housing need figure calculated by Government.
- 4.14 Members therefore without appropriate evidence or analysis of reasonable alternatives arbitrarily lowered the housing requirement.
- 4.15 The Icen report in July 2021 which explored Housing, Economic Growth and Demographic Modelling clearly shows that the housing need and therefore the housing requirement should be

higher. The Icen Report identified the standard methodology figure of 2,923 dwellings per annum. Linking with the economic growth aspirations shows a housing requirement of 2,323 dwellings per annum. This again is higher than the housing requirement in the Plan of 2,090 dwellings per annum. The Icen report only suggests reducing the housing requirement if economic activity rates could be increased in the population. However, little evidence is provided on this.

- 4.16 Therefore, all the indications are that without evidence the housing need within Sheffield has been artificially reduced.
- 4.17 Strata Homes also notes that the Council has identified Broad Locations within the Urban Area for future growth. However, as stated in the supporting text to Policy H1 “there is not yet sufficient certainty to allocate all the land that is potentially suitable for housing in these areas”. These areas require relocation of uses, land assembly and new infrastructure. These sites are long term and cannot be relied upon. Strata Homes considers appropriate housing sites should be identified to deliver the requisite number of homes for the full Plan period. Furthermore, the equivalent long term sites should be identified in the Green Belt. In accordance with the Framework safeguarded land for longer term development needs should be identified and which can be released as a resource to ensure the housing needs of the City are met.
- 4.18 **Strata Homes is concerned that the this Local Plan does not seek to meet its identified needs with regards to housing and employment and has not been prepared positively having regard to the economic growth aspirations of the City Region, and beyond.**

Economic Growth

- 4.19 Sheffield forms an important part of the Northern Powerhouse and it is the driving force in the Sheffield City Region. The South Yorkshire authorities form a key economic area between the rest of Yorkshire and the North of England and the Midlands. Sheffield is located on the M1/M18 as key routes to the north, south and east and the Midland Mainline railway.
- 4.20 The Council is seeking to create 219.3 hectares of new employment land over the Plan period, which will create economic investment and additional jobs.
- 4.21 The Sheffield City Region Strategic Economic Plan 2021-2041 focusses on the growth of Sheffield, Rotherham, Barnsley and Doncaster. The SEP highlights that having available “good quality, well connected and attractive land for new homes and jobs is a major competitive advantage for the SCR”. The SEP therefore states that to deliver the growth aspirations “we must bring forward a combination of mixed-use developments, large strategic opportunities and strategic regeneration in key growth areas”. The SEP continues stating that “we need to focus on a small number of big opportunities – sites and developments that have the scale to benefit the wider city region”.
- 4.22 The SEP seeks to target growth in GVA of an extra £7.6 billion and an extra 33,000 higher level jobs. Despite this focus the plan still acknowledges that the strongest employment growth forecast is within lower productivity sectors, such as residential care, food and logistics.

- 4.23 It is therefore evident that the emerging Sheffield Local Plan is not in accordance with the aims and objectives of the Strategic Economic Plan for the Sheffield City Region and could undermine its delivery.

Housing Need

- 4.24 The Framework is clear that to be considered positively prepared and therefore 'sound', the Plan must, as a minimum, meet the Plan Area's objectively assessed needs.
- 4.25 The PPG is clear that the standard method identifies a minimum annual housing need figure and that it does not produce a housing requirement figure. It is also clear that the affordability adjustment within the standard methodology is just to ensure that the minimum housing needs starts to address affordability of homes. It therefore does not fully address affordability issues.
- 4.26 The PPG goes on to identify the circumstances when it is appropriate to plan for a higher housing need figure than the standard methodology identifies. *'The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides the minimum starting point in determining the number of homes needed in an area...it does not predict the impact of future government policies, changing economic circumstances or other factors that might have an impact on demographic behaviour. Therefore there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicate.'*
- 4.27 *This will need to be assessed prior to and separate from, considering how much of the overall need can be accommodated. Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:*
- 4.28 *Growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth*
- 4.29 Strategic infrastructure improvements that are likely to drive an increase in the homes needed locally;
- 4.30 *An authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground.*
- 4.31 *There may, occasionally be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently produced SHMA) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need that the standard model suggests'. Paragraph 010 Reference ID: 2a-010-20190220.*
- 4.32 The Council need to recognise that the development of new housing will bring forward additional economic benefits to the area. The relationship between economic performance in an area and housing is complex, but having the right quantity, quality and balance of housing in an area is necessary for economic growth. The development of new housing can therefore support local economic growth, both through direct job creation through the construction phase of the scheme, but also through the increased population which will create sustainable local jobs from the

increased demand for goods and services. This provides an important sustainable development opportunity for Sheffield.

- 4.33 Importantly the HBF released in July 2018 its report on “the economic footprint of house building in England and Wales”, which shows that house building in England and Wales is now worth £38bn a year and supports nearly 700,000 jobs. House building activity contributes economically in different ways including providing jobs, tax revenues and contributing funding for local infrastructure and communities. House building supports the economic in a wider sense through being drive for economic growth; delivering jobs and economic value; supporting labour market mobility; creating skills and employability; enhancing place competitiveness; creating quality of place and reusing brownfield land.
- 4.34 An important conclusion of the report and the wider economic benefits is that a healthy, well-functioning labour market requires a good supply of housing that is affordable for local people to enable them to move jobs freely and match up skills supply with employer demand. A dysfunctional housing market can inhibit labour market mobility, in turn stifling economic growth.
- 4.35 Strata Homes maintain that there are clear circumstances in Sheffield which demonstrate that housing need in Sheffield is higher than the figure that results from the use of the standard method. These include:
- The growth strategy
 - Past delivery rates
 - Affordable housing need
- 4.36 The standard methodology is based on 2014 SNPP projections. Although, the Government has accepted that there are flaws in the approach to the standard method, it is still the most appropriate approach at this time to boost the supply of homes and ensure the delivery of 300,000 homes per annum. The Government has committed to levelling up the UK economy, and to achieving a better distribution of homes where homes are identified in more high-demand areas and in emerging demand areas across the country (such as the Northern Powerhouse). This will help avoid issues where unaffordable areas in high demand are planning for low numbers of homes due to past trends of suppressed household formation.
- 4.37 Strata Homes appreciate that the Government has recently consulted on proposed changes to the Framework, which reinforces the need to an evidence base, the uplift for the top 20 most populated centres, still highlights meeting the housing need for the area and that you can still amend Green Belt boundaries to meet the need and growth ambitions. The proposed changes to the Framework are not Government policy at present and therefore any other changes to the Framework do not apply to this Local Plan Review.

Housing Requirement – Economic Growth

- 4.38 Sheffield is an integral part of the Sheffield City Region and the ambitious growth aspirations. Therefore, as highlighted earlier to achieve the aspired growth that the City Region is seeking to achieve, and is securing Government funding for, the level of new housing needs to reflect the ambitions of the Strategic Economic Plan.

- 4.39 Furthermore, the Sheffield City Region Integrated Infrastructure Plan states:
- 4.40 *A quality housing offer has a crucial role to play in the future economic growth of the City Region. It is essential to attracting and retaining a skills base that supports inward investment as we as meeting existing and future community needs and retention of Sheffield City Region (SCR) talent.*
- 4.41 *It has been identified that between 70,000 and 100,000 additional homes are needed in SCR to support the proposed economic growth over the next 10 years. These will have the dual benefit of providing accommodation that underpins the proposed increase in employment (70,000 jobs), as well as the wider economic benefits that housing investment brings.*
- 4.42 *Housing forms a key component of the SCR construction sector. The CBI [CBI (2012) Bridging the Gap – Backing the Construction Sector to Create Jobs] estimates that every £1 spent on construction projects yields a total of £2.84 expenditure in the wider economy. It is estimated that approximately £2,000 per annum per household spending on local convenience goods, and approximately £2,700 per annum per household spending on local comparison goods can be attributed to residents in new housing. (Over the lifetime of the SEP, a similar amount would generate at least £400 million for the SCR economy). The GVA benefits that can be attributable to new housing are as follows:*
- Construction: material, labour professional skills and other services for construction, compounded by supply chain benefits
 - Household Maintenance Spend: Spend on products and services associated with each new household
 - Direct Job Uptake: GVA resulting from new productive workers moving into SCR, compounded by their spend on SCR products and services
 - Indirect (Chain) Benefits: As SCR residents move up the housing chain, this creates new available space in different sub-markets.
 - Preventing Displacement: The type and location of construction may be important in mitigating losses of households from the city region that might otherwise occur.
- 4.43 Within this context it is important that the Council plans for new jobs and associated new homes in accordance with the Strategic Economic Plan growth aspirations.
- 4.44 As highlighted earlier, the SEP established a target to deliver 33,000 new high skilled jobs. The SEP has an ambition for the economy to work for everyone and will be a net contributor to the national economy, retain talent and attract new investors to locate in the region. It recognises the relationship between housing and economic growth, with a key commitment to make homes and land available for families and businesses to locate and grow. Within Sheffield there is an objective of creating an inclusive wellbeing economy; increasing 'good' jobs; supporting growth of productive and competitive business; recognise the importance of place; consolidate Sheffield as a Magnet City; Transformed transport connectivity, linking people to jobs; housing that provides quality, choice and affordability across the city.
- 4.45 The SEP is clear that there is a need to maintain housing growth, alongside investing in the quality of existing stock. The SEP continues to recognise the significant potential for the Sheffield

economy and the need to unlock that potential. This SEP does not set a specific job target for overall jobs growth, although as indicated above the ELR notes that evidence to support the SEP indicated a target of 1% jobs growth across the SCR, which the ELR notes was a reasonable forecast for Sheffield.

- 4.46 In recognition of this ambition for Sheffield within the SEP, and in order to support the vision set out within the emerging Local Plan that Sheffield will be playing a nationally significant economic role at the heart of the region, there is a need to ensure that the level of housing growth planned for, aligns with the economic growth. It is critical that this supports jobs growth in terms of both the quantum of housing offered but also in terms of the choice of size, type, tenure and location, reflecting the diversity of the economy, the forecast growth in lower productivity sectors, and the targets to increase higher skilled jobs.
- 4.47 As highlighted earlier, the Icen Report does not appropriately show the implications on economic growth for the proposed housing requirement of 2,090 homes per annum. The report suggests that the housing requirement could be lowered if economic activity rates were increased, however there is no modelling or evidence to support such assertions.
- 4.48 Therefore there is a clear need to model the implications of aspirational yet deliverable jobs growth on housing growth, acknowledging the sectors forecast to grow as well as those being targeted.
- 4.49 Strata Homes reserve the right to comment further following the preparation of any further evidence by the council. Strata Homes consider on the basis of the SCR ambition and Sheffield strengths and opportunities that **the housing requirement needs to be uplifted to reflect the aspirations for jobs growth.**
- 4.50 Strata Homes note in the earlier Issues and Options Paper that the SA has assessed an option for housing growth that was consistent with the Aspirational Job growth scenario by Edge, for circa 2660 dwellings per annum. This option is considered to perform as well in the sustainability appraisal as the option pursued within the Issues and Options document and better than the proposed option in terms of Aim 1: A vibrant and competitive economy with good job opportunities available to the whole economy.

Housing Requirement – Housing Delivery

- 4.51 As stated above PPG indicates that consideration can be given to delivery rates, for the last five years net completions have been higher than the proposed local plan target in all but two years. Net completions amount to 11,811 dwellings, with annual completions as follows:

2016/17	2017/18	2018/19	2019/20	2020/21
2,458	2,386	2,000	3,101	1,866

- 4.52 The year 2020/21 is largely affected by Covid-19 Pandemic and should therefore be considered an outlier. Therefore, this demonstrates that there is sufficient demand to support a requirement above the standard methodology of 2,923 dwellings per annum, and the plan requirement of 2,090 dwellings per annum. The annual average over the four years 2016/17 to 2019/20 is 2,486 dwellings. Furthermore, the Council acknowledged within the earlier consultations, including the Issues and Options in 2020 that much of the completions are as a result of the delivery of student housing, and that there is still a need to deliver family housing. Page 26 of the Issues and Options document notes that every year “people move from Sheffield to other districts in the Sheffield City Region. In particular there is a trend for people wanted suitable family housing to move to Rotherham, North East Derbyshire and Barnsley, demonstrating the need to ensure that a full range of house types, sizes and tenures are provided in order to deliver a balanced housing market, support economic growth and foster more sustainable travel patterns”.
- 4.53 The Housing Technical Paper that supported the Issues and Options consultation states in paragraph 2.20 the annual average over the last six years of 2,230 homes per annum has been at a level around that which will be needed to meet the plan requirement. It will therefore be important that the Sheffield Plan identifies enough deliverable land.
- 4.54 There is therefore evidence of both delivery at a higher rate and recently published evidence that indicates a higher need for housing. As stated above, PPG is clear that this evidence should be taken into account when determining the housing requirement.
- 4.55 Strata Homes consider further evidence is required to demonstrate whether the affordable housing needs of Sheffield can be met based on a target of 2,090 dwellings per annum. Whilst it is accepted that the calculation of local housing need figure includes an adjustment for affordability, however there are inherent issues with reliance on the workplace –based median house price to median earnings ratio and its ability to reflect affordability issues on the ground.
- 4.56 The joint SHMA considers that the current need for affordable housing amounts to 902 dwellings per annum. The current need for affordable housing, 902 affordable units, represents 43% of the Local Plan requirement for housing. The emerging Local Plan proposes the following requirement for affordable housing: 30% in high value areas, 10% in most other areas. Critically the Plan indicates that there are areas including the city centre where it is not viable to provide any affordable housing. This is where the Plan seeks to focus a significant proportion of the housing requirement within each of the three spatial options.
- 4.57 The affordable completions for the last six years (based on Live Table 1011) are as follows:

2016/17	2017/18	2018/19	2019/20	2020/21	2021/22
327	99	165	129	207	131

- 4.58 It is evident from this information that the total affordable completions fall below the identified affordable need, even when total completions are higher than the proposed Local Plan requirement of 2,090 per annum. Therefore, in the context of the level of affordable need, viability issues, and a likely upper requirement for 30% affordable housing, Strata Homes are concerned that a target of 2,090 dwellings per annum will not deliver sufficient number and range of affordable homes to meet the identified needs within the City. In order to deliver 902 affordable dwellings per year, a requirement of at least 3,000 dwellings per annum would be required. This assuming the achievement of an average of 30% affordable housing, which represents two times that of the highest achieved over the last three years of monitoring, and given viability issues within parts of the city would still require significant public sector investment. Importantly the SHMA notes a worsening picture of need in Sheffield for a variety of reasons including an insufficient supply of new affordable housing to meet previously identified requirements. It considers that the Plan must increase the supply of affordable housing in a sustainable and long term way. An uplift to the overall requirement will serve to support the delivery of affordable housing in Sheffield.
- 4.59 Strata Homes consider that there is sufficient evidence pointing to the need for further uplift in the Local Plan housing requirement, based on the need to support the local plans economic ambitions, evidence of delivery and the need to ensure sufficient delivery of affordable housing.
- 4.60 Strata Homes consider that the policy in its current form is not justified and is not consistent with the Framework the Plan in its present form could fail to deliver sustainable development in accordance with policies in the Framework. In these circumstances, we do not consider the Sheffield Local Plan in its current form to be sound.
- 4.61 However, Strata Homes consider that with a higher requirement, of at least 3,000 homes as a minimum to reflect current delivery, meet the economic growth aspirations, and to ensure that the needs for affordable homes can be met. This reflects the standard methodology.

Assessment of Housing Supply

- 4.62 A brief review of a number of the proposed allocation sites has been undertaken and is attached at Appendix 1. An assessment has been undertaken of whether they will be likely to deliver housing units in the first five years of the local plan being adopted and whether they are developable over the plan period.
- 4.63 Paragraph 74 of the Framework sets out that: *“Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years worth of housing against their housing requirement set out in adopted strategic policies.”*
- 4.64 The Framework provides a definition of deliverable: *“To be considered deliverable, sites for housing should be available now, off a suitable location for development now and be achievable with a realistic prospect that housing will be delivered on the site within five years...”*
- 4.65 The Framework provides a definition of developable: *“Sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.”*

- 4.66 This analysis has had regard to the site assessments contained within the Site Selection Methodology (January 2023), the Five Year Land Supply monitoring report and also included a desktop review of using the planning portal, land registry and google earth to ascertain whether there were any ownership constraints, existing businesses or other uses currently occupying the sites which may preclude or delay delivery onsite. Findings of this analysis are noted in the comments section in the table below.
- 4.67 The 5 Year Housing Land Supply Monitoring Report (December, 2022) does not provide a list of specific sites which contribute to the Five Year Land supply and therefore it is impossible to analyse those sites to ensure they are deliverable. We have instead reviewed a sample of the proposed allocation sites to assess whether they are deliverable and developable.
- 4.68 Table 4 of the 5 Year Housing Land Supply Monitoring Report (December 2022) states that the current 5-year deliverable supply is 3.63 years. The Authority Monitoring Report (January 2023) notes at paragraph 5.13 that the: *"...current deliverable land supply is 3.63 years. This covers the period 2022/23 to 2026/27 and has been calculated using the Government's local housing need figure (currently 3,018 additional homes per year)."* The same paragraph goes on to state that: *"Taking account of the proposed housing requirement in the Publication Draft Local Plan the current deliverable supply would be 5.37 years in advance of the allocations being adopted in the plan."* The proposed housing target is 2,090 homes per annum from 2022 to 2039 and does not take account of the 35% uplift for cities.
- 4.69 The analysis covered 36 sites with a total capacity of 9,712 units. The total available supply according to the Sheffield Housing and Economic Land Availability Assessment (December 2022) is 35,578 units. Therefore this assessment covers approximately 27% of all of the housing supply across the district. It is our belief that if our analysis were to be extended to cover the entirety of the supply similar conclusions would emerge, namely that many of the proposed allocations have significant deliverability concerns and therefore are unlikely to deliver the required housing to meet the needs of the district.
- 4.70 Of the 36 sites our analysis demonstrates that only 8 are likely to deliver housing units within the first five years of the plan being adopted. The output from these 8 sites has been assessed utilising realistic rates of delivery and lead in times. Where land is within multiple ownerships and requires assembly we have allowed 1 year. We have allowed 2 years for planning applications to be approved. We have assumed a lead in time of six months from planning permission to the first units being delivered. Where sites are large (i.e. over 500 units) and do not yet have planning permission it is unlikely that they will deliver housing within the first five years of the plan. On sites which are likely to be comprised of estate housing rather than flats we have assumed delivery of 30 dwellings per annum per outlet.
- 4.71 Our analysis has shown that only approximately 759 units are deliverable within the first five years of the plan or 7.8% of the total capacity of the 36 housing allocations (9,712 units) which were analysed.
- 4.72 Regarding the remaining 28 sites, an assessment of whether they are developable has been undertaken. Of the remaining 28 allocation sites only 5 have been shown to be developable. Therefore our assessment shows that 23 of the sites do not have a reasonable prospect of delivering housing units within the plan period.

- 4.73 The 23 sites which have been identified as not developable include a sites which are currently occupied by other uses, such as a Mecca Bingo Hall, a B & Q store, a Decathlon store and a Wickes store. They also include areas of land which are covered by multiple ownerships with existing businesses operating from them. No evidence has been provided that there is a reasonable prospect that these sites will become available for development.
- 4.74 The 23 sites which have been identified as undevelopable include capacity for 6,381 dwellings. There is very little prospect of these sites coming forward during the plan period and therefore alternative sites will need to be found to accommodate the required housing need for the district.
- 4.75 Therefore, there is no five year housing land supply and there is no evidence of a supply of housing for the Plan period.
- 4.76 Furthermore, as stated earlier the introduction to Section 5: Housing Policies acknowledges the difficulties with the housing supply over the Plan period, stating that “there is not yet sufficient evidence to show it is deliverable before 2029” and that “public intervention will be needed to enable much of the former employment land to transition to sustainable, desirable residential areas” and that “many of the potential development sites have multiple owners” and there is a need for financial support from the Government.

Windfall Allowance

- 4.77 Furthermore, it appears the Council are seeking to rely on a windfall allowance of circa 200 dwellings per year, which is 1,000 homes over the first five years of the Plan. This is evidenced in the Housing Land Supply report in paragraph 3.17. However, this shows completions dropping from 2018/19 onwards, which shows from 2018-2022 the average completions being 144 dwellings per annum. Furthermore, the Council is seeking to apply the windfall allowance from Year 1 and therefore there is a risk of double counting.
- 4.78 It is important in relation to windfalls that there is sufficient evidence to demonstrate that this will continue. Sheffield does not currently have an up to date Plan and therefore there are significant windfalls. Strata Homes would expect that the level of windfalls would reduce with the allocation of sites within a recently adopted Plan. Strata Homes suggest the windfall allowance be reduced accordingly and sufficient allocations be identified.

Exceptional Circumstances

- 4.79 Therefore, there is a significant shortfall in the proposed housing provision and the Council accepts the need to utilise the Green Belt for housing purposes by allocating the Norton Aerodrome site. Strata Homes consider further sites should be identified to address the shortfall and meet the need and demand for homes.
- 4.80 Strata Homes is concerned that the Council is effectively deferring the issue to a future Local Plan Review. This is not in the spirit of the Framework, where it is clear that there are exceptional circumstances to justify the release of green belt, attributed to the scale of need for both housing and employment land. The approach to Green Belt release being taken within the emerging Local Plan is very short sighted and effectively seeks to defer the decision on Green Belt release until a

future plan review. It is accepted that the Framework requires authorities to examine all other 'reasonable' options for meeting its identified needs for development before concluding exceptional circumstances exist to justify changes to the Green Belt. However, this has already occurred through the release of the Norton Aerodrome site.

- 4.81 The Framework is clear that strategic policies should set out an overall strategy for the pattern and scale of development and makes sufficient provision for housing and that strategic policies should look ahead over a minimum 15 years from adoption to anticipate and respond to long term requirements and opportunities. It is not reasonable to adopt an approach that does not identify sufficient land to meet the needs within the Plan.
- 4.82 The Green Belt has not been reviewed since the late 1960's. The Local Plan presents an opportunity to review the Green Belt and ensure that the revised boundary has permanence in the long term to endure beyond the Plan period. Paragraph 136 of the Framework considers that Green Belt Boundaries can change in "exceptional circumstances". Such circumstances exist in Sheffield through the significant need to provide housing and employment land within Sheffield to meet identified needs.
- 4.83 The Framework is clear that when drawing up or reviewing Green Belt boundaries, that the need to promote sustainable patterns of development should be taken into account. Where it is necessary to release Green Belt land for development, plans are required to give first consideration to land which has been previously-developed and or is well-served by public transport.
- 4.84 Strata Homes consider that the release of Green Belt sites should prioritise sites that benefit from good public transport connections consistent with the Framework and the overall aims of the Plan. Strata Homes consider that the strategy for Green Belt release should therefore have regard to sites that could facilitate the delivery of public transport improvements, including the Don Valley Line to Stocksbridge, the identified Mass Transit Corridors and public transport connections available to enable residents to access employment alongside other services and facilities.

To check unrestricted sprawl

- 4.85 The site is contained by the surrounding landform, vegetation and existing built form and will not lead to unrestricted sprawl or encroachment. The site is located on the edge of Deepcar with residential development located to the north and a natural robust Green Belt Boundary to the south and west in the form of Stocksbridge Golf Course and to the east in the form of a strong landscape buffer.

To prevent neighbouring towns from merging

- 4.86 The site would not result in merging, the nearest settlement to the south, Wharnccliffe Side, is separated by Birtholmes Wood and More Hall Reservoir.

To assist in safeguarding the countryside from encroachment

- 4.87 The site is relatively contained by topography, and existing boundary treatment. The perception of any encroachment into the countryside is minimised by the level of urban influence at this location and the relative containment of the site.

To preserve the setting of historic towns

4.88 The site will have no impact on the setting of a historic town.

To assist in urban regeneration

4.89 There are no deliverable brownfield sites in Stocksbridge/Deepcar. Development here will not detract from efforts to regenerate the area. In fact, it will assist these efforts by increasing footfall and providing new homes for highly skilled workers.



4.90 The proposed new Green Belt boundary will be defined by the golf course to the south and Townend Lane to the east. The eastern boundary will be greatly enhanced to provide a permanent

robust boundary. This will accord with the Framework, ensuring the Green Belt is clearly defined using readily recognisable features, reinforcing the urban context whilst providing a robust boundary for the future.

- 4.91 The site boundaries can be reinforced through additional planting to provide an effective transition between the development and the countryside beyond. There is also the potential to enhance existing connections between the urban area and wider countryside.
- 4.92 The site's impact on the openness of the Green Belt will be limited as it is contained within its landscape within a residential area. It can be therefore demonstrated that the site has a limited role to play when considered against the five purposes of the Green Belt, and the redevelopment of the site will not undermine the integrity of the Green Belt.

Regeneration Imperative

- 4.93 The Townend Lane site presents a significant opportunity to create new high quality homes in a sustainable location to address the City's housing need. The site has the opportunity to create a sustainable living environment close to services, facilities and public transport routes.
- 4.94 The site can assist with delivering the high quality new homes the area needs to attract the high skilled workforce to the town. This will also assist in creating the critical mass of population to deliver the new infrastructure the town seeks to develop, including reopening the railway line to Sheffield, which will enhance the connectivity of the area.
- 4.95 Strata have analysed the local Housing Market Area and attach a Housing Market Assessment (Appendix 3) to these representations, which shows a specific case to broaden the housing offer within Stocksbridge/Deepcar to assist the regeneration ambitions for the area and attract the high skilled workforce desired.
- 4.96 The Townend Lane site is an opportunity to create a truly sustainable housing development for the twenty-first century.

Site Proposals

- 4.97 Strata Homes therefore consider that their site at Townend Lane should be allocated for housing purposes to address this significant shortfall in housing over the Plan period and assist in the regeneration of Stocksbridge/Deepcar.
- 4.98 The Housing Market Assessment shows that there is a need to increase the number of homes and diversify the housing stock within Stocksbridge/Deepcar. It is not just important to deliver the right number of homes within Stockbridge/Deepcar, but it is essential that homes of the right type and tenure are delivered, this will not only support Stocksbridge/Deepcar but could also support the wider Sheffield City and stem the significant outflows from the City into neighbouring areas
- 4.99 The Townend Lane site is an appropriate site to provide for the housing needs of the Plan area in the short term. The site is available, suitable and achievable and therefore deliverable in accordance with the Framework.

- 4.100** The Townend Lane site sits in an urban context and should be considered as a priority for allocation.
- 4.101** A site summary is provided in response to Policy SA5 and the Advocacy Report is attached at Appendix 2 and the Housing Market Assessment at Appendix 3.

Proposed Change

- 4.102** To overcome the objection and address soundness matters, the following changes are proposed:
- Update the evidence base.
 - Increase the housing requirement.
 - Identify further housing sites.
 - Identify safeguarded land for longer term development.
 - Allocate the site at Townend Lane, Stocksbridge for housing use.

05 Policy SP2

Policy SP2: Spatial Strategy

- 5.1 The Spatial Strategy will not deliver the housing need and does not reflect the evidence base, national policy and guidance and is therefore unsound.

Justification

- 5.1 As highlighted earlier in the General Comments section of these representations, Strata Homes has concerns with the approach of the Spatial Strategy and how it was identified.
- 5.2 Strata Homes does not consider that the Spatial Strategy and the strategic approach of the Plan will meeting the identified housing needs.
- 5.3 The Spatial Option 3 proposed is one of urban brownfield and greenfield sites and one brownfield housing site in the Green Belt for circa 280 homes. Strata Homes considers that their site at Townend Lane, Stocksbridge should be identified. The site is already partly within the Urban Area, is in a sustainable location close to services and facilities and can facilitate the delivery of public transport improvements.
- 5.4 Strata Homes considers that the strategy should be developed to meet the identified needs and should be developed in such a manner that does not prevent the delivery of other sustainable sites or sustainable developments.

Proposed Change

- 5.5 To overcome the objection and address soundness matters, the following changes are proposed:
- Update Spatial Strategy to address the evidence base and meet the identified housing needs.
 - Allocate the site at Townend Lane, Stocksbridge for housing use.

06 Policy SA1

Policy SA1: Central Sub-Area

- 6.1 The Central Sub-Area sites will not meet the identified need for housing.

Justification

- 6.2 This Sub-Area includes significant urban brownfield sites and a significant proportion of the proposed new homes over the Plan period. However, as highlighted earlier there is very little evidence on the deliverability of the sites allocated.
- 6.3 As stated earlier this is evidenced within the start of the housing chapter the difficulties with the housing supply over the Plan period, stating that “there is not yet sufficient evidence to show it is deliverable before 2029” and that “public intervention will be needed to enable much of the former employment land to transition to sustainable, desirable residential areas” and that “many of the potential development sites have multiple owners” and there is a need for financial support from the Government.
- 6.4 Strata Homes have analysed the potential housing supply, as summarised in response to Policy SP1 and a summary table attached at Appendix 1. This shows sites in this area, including Sites SV07, HC15, SV08, SV09, SU06, HC04 and SV10 all having significant deliverability constraints comprising sites which are still currently in use and operational, no evidence on availability and multiple ownerships.
- 6.5 Strata Homes therefore considers that the strategy should be developed to meet the identified needs and should be developed in such a manner that does not prevent the delivery of other sustainable sites or sustainable developments.

Proposed Change

- 6.6 To overcome the objection and address soundness matters, the following changes are proposed:

- Update Spatial Strategy to address the evidence base and meet the identified housing needs.
- Allocate the site at Townend Lane, Stocksbridge for housing use.

07 Policy SA2

Policy SA2: Northwest Sheffield Sub-Area

- 7.1 The Northwest Sheffield Sub-Area sites will not meet the identified need for housing.

Justification

- 7.1 This Sub-Area includes 1,015 new homes. However, as highlighted earlier there is very little evidence on the deliverability of the sites allocated.
- 7.2 As stated earlier this is evidenced within the start of the housing chapter the difficulties with the housing supply over the Plan period, stating that “there is not yet sufficient evidence to show it is deliverable before 2029” and that “public intervention will be needed to enable much of the former employment land to transition to sustainable, desirable residential areas” and that “many of the potential development sites have multiple owners” and there is a need for financial support from the Government.
- 7.3 Strata Homes have analysed the potential housing supply, as summarised in response to Policy SP1 and a summary table attached at Appendix 1. This shows for example sites NWS10 and NWS12 where there is no evidence of availability. NWS12 has a lapsed planning permission and NWS10 is an existing industrial site, which although has planning permission for 80 homes, the existing use on site is continuing and there is no evidence of a larger number of homes towards 169 dwellings as identified in the Local Plan.
- 7.4 Strata Homes therefore considers that the strategy should be developed to meet the identified needs and should be developed in such a manner that does not prevent the delivery of other sustainable sites or sustainable developments.

Proposed Change

- 7.5 To overcome the objection and address soundness matters, the following changes are proposed:

- Update Spatial Strategy to address the evidence base and meet the identified housing needs.
- Allocate the site at Townend Lane, Stocksbridge for housing use.

08 Policy SA3

Policy SA3: Northeast Sheffield Sub-Area

- 8.1 The Northeast Sheffield Sub-Area sites will not meet the identified need for housing.

Justification

- 8.2 This Sub-Area includes 970 new homes. However, as highlighted earlier there is very little evidence on the deliverability of the sites allocated.
- 8.3 As stated earlier this is evidenced within the start of the housing chapter the difficulties with the housing supply over the Plan period, stating that “there is not yet sufficient evidence to show it is deliverable before 2029” and that “public intervention will be needed to enable much of the former employment land to transition to sustainable, desirable residential areas” and that “many of the potential development sites have multiple owners” and there is a need for financial support from the Government.
- 8.4 Strata Homes have analysed the potential housing supply, as summarised in response to Policy SP1 and a summary table attached at Appendix 1.
- 8.5 Strata Homes therefore considers that the strategy should be developed to meet the identified needs and should be developed in such a manner that does not prevent the delivery of other sustainable sites or sustainable developments.

Proposed Change

- 8.6 To overcome the objection and address soundness matters, the following changes are proposed:
- Update Spatial Strategy to address the evidence base and meet the identified housing needs.
 - Allocate the site at Townend Lane, Stocksbridge for housing use.

09 Policy SA4

Policy SA4: East Sheffield Sub-Area

- 9.1 The East Sheffield Sub-Area sites will not meet the identified need The XXXX

Justification

- 9.2 This Sub-Area includes 2,945 new homes. However, as highlighted earlier there is very little evidence on the deliverability of the sites allocated.
- 9.3 As stated earlier this is evidenced within the start of the housing chapter the difficulties with the housing supply over the Plan period, stating that “there is not yet sufficient evidence to show it is deliverable before 2029” and that “public intervention will be needed to enable much of the former employment land to transition to sustainable, desirable residential areas” and that “many of the potential development sites have multiple owners” and there is a need for financial support from the Government.
- 9.4 Strata Homes have analysed the potential housing supply, as summarised in response to Policy SP1 and a summary table attached at Appendix 1. This shows for example sites ES25 and ES27. ES 25 is currently in open space use and where the Open Space Assessment highlights insufficient green space in the locality, whilst ES27 is a cleared site that requires intervention to come forward and will therefore take time.
- 9.5 Strata Homes therefore considers that the strategy should be developed to meet the identified needs and should be developed in such a manner that does not prevent the delivery of other sustainable sites or sustainable developments.

Proposed Change

- 9.6 To overcome the objection and address soundness matters, the following changes are proposed:

- Update Spatial Strategy to address the evidence base and meet the identified housing needs.
- Allocate the site at Townend Lane, Stocksbridge for housing use.

010 Policy SA5

Policy SA5: Southeast Sheffield Sub-Area

- 10.1 The Southeast Sheffield Sub-Area sites will not meet the identified need.

Justification

- 10.2 This Sub-Area includes 1,640 new homes. However, as highlighted earlier there is very little evidence on the deliverability of the sites allocated.
- 10.3 As stated earlier this is evidenced within the start of the housing chapter the difficulties with the housing supply over the Plan period, stating that “there is not yet sufficient evidence to show it is deliverable before 2029” and that “public intervention will be needed to enable much of the former employment land to transition to sustainable, desirable residential areas” and that “many of the potential development sites have multiple owners” and there is a need for financial support from the Government.
- 10.4 Strata Homes have analysed the potential housing supply, as summarised in response to Policy SP1 and a summary table attached at Appendix 1. This shows for example sites SES10, SES11 and SES12. SES12 is another area of open space, whilst there is no evidence that SES11 is available.
- 10.5 Strata Homes therefore considers that the strategy should be developed to meet the identified needs and should be developed in such a manner that does not prevent the delivery of other sustainable sites or sustainable developments.

Proposed Change

- 10.6 To overcome the objection and address soundness matters, the following changes are proposed:
- Update Spatial Strategy to address the evidence base and meet the identified housing needs.

- Allocate the site at Townend Lane, Stocksbridge for housing use.

011 Policy SA6

Policy SA6: South Sheffield Sub-Area

11.1 The South Sheffield Sub-Area sites will not meet the identified need.

Justification

11.2 This Sub-Area includes 765 new homes. However, as highlighted earlier there is very little evidence on the deliverability of the sites allocated.

11.3 As stated earlier this is evidenced within the start of the housing chapter the difficulties with the housing supply over the Plan period, stating that “there is not yet sufficient evidence to show it is deliverable before 2029” and that “public intervention will be needed to enable much of the former employment land to transition to sustainable, desirable residential areas” and that “many of the potential development sites have multiple owners” and there is a need for financial support from the Government.

11.4 Strata Homes have analysed the potential housing supply, as summarised in response to Policy SP1 and a summary table attached at Appendix 1. This area includes site SS17: former Norton Aerodrome for circa 280 new homes on part of the site, which will be released from the Green Belt.

11.5 Strata Homes therefore considers that the strategy should be developed to meet the identified needs and should be developed in such a manner that does not prevent the delivery of other sustainable sites or sustainable developments.

Proposed Change

11.6 To overcome the objection and address soundness matters, the following changes are proposed:

- Update Spatial Strategy to address the evidence base and meet the identified housing needs.

- Allocate the site at Townend Lane, Stocksbridge for housing use.

012 Policy SA7

Policy SA7: Southwest Sheffield Sub-Area

12.1 The Southwest Sheffield Sub-Area sites will not meet the identified need.

Justification

12.2 This Sub-Area includes 755 new homes. However, as highlighted earlier there is very little evidence on the deliverability of the sites allocated.

12.3 As stated earlier this is evidenced within the start of the housing chapter the difficulties with the housing supply over the Plan period, stating that “there is not yet sufficient evidence to show it is deliverable before 2029” and that “public intervention will be needed to enable much of the former employment land to transition to sustainable, desirable residential areas” and that “many of the potential development sites have multiple owners” and there is a need for financial support from the Government.

12.4 Strata Homes have analysed the potential housing supply, as summarised in response to Policy SP1 and a summary table attached at Appendix 1.

12.5 Strata Homes therefore considers that the strategy should be developed to meet the identified needs and should be developed in such a manner that does not prevent the delivery of other sustainable sites or sustainable developments.

Proposed Change

12.6 To overcome the objection and address soundness matters, the following changes are proposed:

- Update Spatial Strategy to address the evidence base and meet the identified housing needs.
- Allocate the site at Townend Lane, Stocksbridge for housing use.

013 Policy SA8

Policy SA8: Stocksbridge/Deepcar Sub-Area

- 13.1 The Stocksbridge/Deepcar Sub-Area sites will not meet the identified need housing.

Justification

- 13.2 This Sub-Area includes 928 new homes. However, as highlighted earlier there is very little evidence on the deliverability of the sites allocated.
- 13.3 As stated earlier this is evidenced within the start of the housing chapter the difficulties with the housing supply over the Plan period, stating that “there is not yet sufficient evidence to show it is deliverable before 2029” and that “public intervention will be needed to enable much of the former employment land to transition to sustainable, desirable residential areas” and that “many of the potential development sites have multiple owners” and there is a need for financial support from the Government.
- 13.4 Strata Homes have analysed the potential housing supply, as summarised in response to Policy SP1 and a summary table attached at Appendix 1. This shows for example sites SD03 where there is no evidence of availability. The site has an expired permission and is an ex-steel works site. The site could have come forward previously and there are therefore likely to be contamination and viability issues.
- 13.5 Strata Homes therefore considers that the strategy should be developed to meet the identified needs and should be developed in such a manner that does not prevent the delivery of other sustainable sites or sustainable developments.
- 13.6 Strata Homes consider that the release of Green Belt sites should prioritise sites that benefit from good public transport connections consistent with the Framework and the overall aims of the Plan. Strata Homes consider that the strategy for Green Belt release should therefore have regard to the identified Mass Transit Corridors, and public transport connections and potential improvements available to enable residents to access employment alongside other services and facilities.
- 13.7 Strata Homes consider that the appropriate areas and sites to accommodate growth would be:

- Townend Lane, Stocksbridge.

13.8 An Advocacy Report and Housing Market Assessment are attached at Appendix 2 and 3.
The masterplan and vision for the proposed scheme and illustrates the potential of the scheme. The Advocacy Report is supported by technical information and the report demonstrates that the site is available, suitable and achievable and therefore deliverable in accordance with the Framework and PPG.

13.9 Strata Homes object to their site at Townend Lane, not being assessed and consider that the site should be allocated for housing.

13.10 Strata Homes maintain that the identified need for housing is not sufficient to support the city and Sheffield City Regions potential and ambition for economic growth over the Plan Period. Furthermore, Strata Homes consider that there are significant concerns regarding the deliverability and rates of delivery of sites within the central area and urban area, and consider that insufficient sites have been identified for housing to meet the identified needs. Therefore, more sites are required.

13.11 Furthermore, Strata Homes has undertaken a Housing Market Assessment for Stockbridge and consider that there is a specific need to increase the number of homes and diversify the housing stock within Stocksbridge/Deepcar. It is not just important to deliver the right number of homes within Stockbridge/Deepcar, but it is essential that homes of the right type and tenure are delivered, this will not only support Stocksbridge/Deepcar but could also support the wider Sheffield City and stem the significant outflows from the City into neighbouring areas.

13.12 The Council have not assessed the Townend Lane site on the basis of the current Spatial Strategy option. Strata homes do not consider this to be an appropriate approach as set out above.

13.13 Strata Homes maintains that the proposed housing site at Townend Lane is available, suitable and achievable and is therefore in accordance with the Framework a deliverable site able to come forward in the short term/medium term.

13.14 The deliverability and benefits of the site is as follows:

Overview of Proposals

13.15 The Townend Lane site provides an opportunity to assist and build upon the renaissance of Stocksbridge/Deepcar by delivering the high quality new homes demanded by the new high skilled workforce which the town wishes to attract. The site is in a highly sustainable location within walking and cycling distance of employment opportunities, shops and services.

13.16 The site can assist with delivering the high quality new homes the area needs to attract the high skilled workforce to the town. This will also assist in creating the critical mass of population to deliver the new infrastructure the town seeks to develop, including reopening the railway line to Sheffield, which will enhance the connectivity of the area.



Availability

- 13.17 Strata have a legal agreement with the landowners to promote and develop the land for housing.
- 13.18 Strata are a well-funded home builder with a strong demonstrable track record of delivery of high quality new homes in the north of England. They are committed to develop the site and have appointed a technical team to provide the resource, expertise and experience to build the proposed scheme.
- 13.19 The land is therefore “available” in accordance with the Framework and the Planning Practice Guidance.

Suitability

- 13.20** The proposed development can make efficient and effective use of the land. The site is not located in an area constrained by landscape or ecological habitats. There are no heritage assets in close proximity to the site. The site is well contained and presents a logical extension to Stocksbridge/Deepcar.
- 13.21** Stocksbridge is a longstanding focus for growth and regeneration in Sheffield, the Town has ambitions to diversify and grow its economy and deliver more housing. Successful Towns Fund investment package and funding bids to explore the reopening of the commuter line to Sheffield underline the Governments backing of Stocksbridge's efforts to level up.
- 13.22** The land is currently made up of agricultural fields with hedgerows and semi mature trees along Common Lane. The settlement form in this area lends itself to the formation of a robust long term Green Belt Boundary to the south east of Stocksbridge/Deepcar. The scheme will include robust landscape buffers to enhance and strengthen this part of the Green Belt.
- 13.23** The site benefits from being located close to employment and food retail opportunities with public transport providing access to further retail and leisure facilities including Stocksbridge and Sheffield City Centre. There are also a number of services such as schools and GP practices close to the site.
- 13.24** Sheffield City Council recognises the need for Green Belt Review to support the growth and regeneration ambitions for the area. The site provides an important opportunity to meet the housing needs of Sheffield, which provides the exceptional circumstances to justify the release of the site from the Green Belt.
- 13.25** The development will provide additional quality development that will benefit the settlement and wider district with economic, environmental and social benefits. The sustainability credentials of the location demonstrate that this is a suitable site for removal from Green Belt to deliver new homes. The site and proposals are therefore "suitable" in accordance Framework and PPG.

Achievable

- 13.26** A range of technical work has been undertaken. From these initial assessments there are no technical issues that would prevent the delivery of the site for residential purposes.
- 13.27** The technical reports show how a mix of housing can be accommodated within the site, alongside connectivity, landscaping and drainage features. The development of the site, as shown within the indicative masterplan, is considered to be achievable

Deliverability

- 13.28** The site at Townend Lane provides a development opportunity that is available, suitable and achievable and therefore it is considered that the site is deliverable, in accordance with national planning policy and guidance. It is promoted by Strata Homes and is deliverable within the plan period.

Effective Use of Land

13.29 The proposed development at Townend Lane is located within close proximity to existing services and facilities and benefits from excellent public transport connectivity. The scheme is therefore making an efficient and effective use of land and infrastructure.

Delivering a Flexible Supply of Housing

13.30 The Framework requires Local Planning Authorities to meet their full objectively assessed housing need. Strata Homes considers that the site at Townend Lane, Stocksbridge is deliverable in the short and will reinforce the housing supply and address the Borough's housing needs in the early periods of the Local Plan. Development of this site will support the delivery of a range of housing types and contribute towards meeting identified needs.

A Positive Response to the Key Objectives of the Framework

13.31 The Framework sets out that the Governments key housing policy goal of significantly boosting the supply of housing and proactively driving and supporting sustainable economic development to deliver homes, business and industrial units, infrastructure and thriving local places that the country needs. The Framework explains that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as extensions to towns, and creating mixed and sustainable communities with good access to jobs, key services and infrastructure. Sites should also make effective use of land and existing infrastructure.

13.32 In relation to the Framework:

- The proposal responds positively towards national guidance.
- The site is appropriate for accommodating housing growth, being an expansion of an existing settlement.
- The proposed site is accessible to existing employment, local community facilities, infrastructure and services, including public transport.
- The site has been assessed as being available, suitable and achievable for development

Benefits of Townend Lane, Stocksbridge

13.33 The development of the site would provide significant economic, social and environmental benefits. The site would provide housing that would meet the needs of the Sheffield housing market. Therefore this site provides a unique opportunity in a sustainable location and without compromising the Green Belt function and purpose.

13.34 In accordance with the Framework this representation has shown that:

- The site is suitable for housing and can deliver circa 100 new homes.
- The proposal can provide a good mix of housing commensurate to the demand and need in the area and diversify the housing stock

- The site is located in close proximity to employment opportunities, existing community facilities and retail facilities, including supermarkets and schools.
- Well served by bus routes linking to Sheffield, Barnsley and Penistone.
- The site is close to the potential railway station for the re-opened Don Valley Line in Stocksbridge.
- Access to the motorway network through junction 35a and 36 of the M1.
- The scheme uses land efficiently and effectively.
- The proposal is in line with planning for housing objectives.
- The proposal will deliver public open space with opportunity to create a green route through the site connecting to existing Green Links, and existing public rights of way.
- The scheme will create direct and indirect job opportunities both during and after construction.

13.35 The proposal is an appropriate site to provide for the housing needs of Sheffield in the short term. Confirmation of the allocation will contribute positively to a balanced housing supply in the City in sustainable locations. The site can deliver a full range and mix of housing as part of a sustainable community. Development of the site would deliver affordable housing. Sheffield needs to have a robust housing trajectory with a sufficient supply of deliverable sites. The site at Townend Lane, Stocksbridge will assist with this delivery in the short term. The site is situated within a prime location suitable for residential development and as such would facilitate the development of land in an effective and efficient manner. Development of the site would not harm or undermine the area's wider policy objectives, but seeks to reinforce the need to develop sites within sustainable locations as a priority.

13.36 The site is available, suitable and achievable and therefore deliverable in accordance with the Framework.

Proposed Change

13.37 To overcome the objection and address soundness matters, the following changes are proposed:

- Update Spatial Strategy to address the evidence base and meet the identified housing needs.
- Allocate the site at Townend Lane, Stocksbridge for housing use.

014 Policy SA9

Policy SA9: Chapeltown/High Green Sub-Area

14.1 The Chapeltown/High Green Sub-Area sites will not meet the identified need for housing.

Justification

14.2 This Sub-Area includes 25 new homes. However, as highlighted earlier there is very little evidence on the deliverability of the sites allocated.

14.3 As stated earlier this is evidenced within the start of the housing chapter the difficulties with the housing supply over the Plan period, stating that “there is not yet sufficient evidence to show it is deliverable before 2029” and that “public intervention will be needed to enable much of the former employment land to transition to sustainable, desirable residential areas” and that “many of the potential development sites have multiple owners” and there is a need for financial support from the Government.

14.4 Strata Homes have analysed the potential housing supply, as summarised in response to Policy SP1 and a summary table attached at Appendix 1.

14.5 Strata Homes therefore considers that the strategy should be developed to meet the identified needs and should be developed in such a manner that does not prevent the delivery of other sustainable sites or sustainable developments.

Proposed Change

14.6 To overcome the objection and address soundness matters, the following changes are proposed:

- Update Spatial Strategy to address the evidence base and meet the identified housing needs.
- Allocate the site at Townend Lane, Stocksbridge for housing use.

015 Policy H1

Policy H1: Scale and Supply of New Housing

- 15.1 Strata Homes consider that Policy H1 will not deliver the housing need and does not reflect the evidence base, national policy and guidance and is therefore unsound.

Justification

- 15.2 Policy H1 states that the delivery of new homes will be in accordance with Policies SP1 and SP2 and be primarily on previously developed sites in the urban area. However, as stated earlier in response to Policies SP1 and SP2, Strata Homes do not consider this strategy to meet the identified housing needs over the Plan period.
- 15.3 Part c) of the policy states that new housing will be delivered on sites that already have planning permission, on housing allocations, in broad locations for growth and through windfalls. However, as stated in response to Policy SP1, Strata Homes have analysed the proposed sites and consider that there are significant constraints and that the Local Plan is deficient in its housing provision.
- 15.4 Part c) states that windfalls will form part of the housing provision, but there is little evidence to support this, especially when the Spatial Strategy is one of urban concentration and the brownfield sites are largely allocated for housing or employment and that the employment strategy is based on recycling employment sites. Strata Homes do not consider that there will be many windfall sites and that a full appropriate provision of housing should be identified.
- 15.5 The need for affordable housing is also significant and part e) suggests that the housing requirement incorporates this need. As highlighted earlier in response to Policy SP1, Strata Homes consider that the housing requirement needs to increase to account for this need.
- 15.6 Similar to our comments to Policy SP1, Strata Homes notes that the Council has identified Broad Locations within the Urban Area for future growth. However, as stated in the supporting text “there is not yet sufficient certainty to allocate all the land that is potentially suitable for housing in these areas”. These areas require relocation of uses, land assembly and new infrastructure. These sites are long term and cannot be relied upon. Strata Homes considers appropriate housing sites should be identified to deliver the requisite number of homes for the full Plan period. Furthermore, the equivalent long term sites should be identified in the Green Belt. In accordance

with the Framework safeguarded land for longer term development needs should be identified and which can be released as a resource to ensure the housing needs of the City are met.

Proposed Change

15.7 To overcome the objection and address soundness matters, the following changes are proposed:

- Update Spatial Strategy to address the evidence base and meet the identified housing needs.
- Identify safeguarded land sites.
- Allocate the site at Townend Lane, Stocksbridge for housing use.

016 Policy ES1

Policy ES1: Measures required to achieve Reduced Carbon Emissions in New Development

- 16.1 Strata Homes supports the reduction in carbon emissions, however policies should be flexible and reflect national policy and guidance.

Justification

- 16.2 Policy ES1 stipulates the measures that should be incorporated into new developments to achieve a reduction in carbon emissions in new developments.
- 16.3 However, it is unclear from the Viability Appraisal how the additional costs have been incorporated into the assessment and where the evidence is derived from. Therefore, the evidence supporting the Plan does not robustly support the policy approach and the potential implications for development, which are mostly urban brownfield sites.
- 16.4 The Viability Appraisal provides a number of percentage cost increases to incorporate into residential schemes and then states “it is clear from a range of data sources that the additional costs will vary tremendously depending on the specifics of the building under consideration”. It is therefore unclear what cost has been incorporated for Policy ES1.
- 16.5 Policy ES1 requires further evidence and be fully justified in relation to implications for potential development schemes.

Proposed Change

16.6 To overcome the objection and address soundness matters, the following changes are proposed:

- Update evidence.
- Incorporate flexibility.

017 Policy ES2

Policy ES2: Renewable Energy Generation

- 17.1 Strata Homes supports the reduction in carbon emissions, however policies should be flexible and reflect national policy and guidance.

Justification

- 17.2 Policy ES2 expects the use of low-carbon energy sources in new developments. However, the Viability Appraisal only assesses solar panels.
- 17.3 There is no assessment on residential schemes and other forms of energy generation and therefore the implications for the delivery of sites, which are mostly brownfield urban schemes.
- 17.4 Policy ES2 requires further evidence and be fully justified in relation to implications for potential development schemes.

Proposed Change

- 17.5 To overcome the objection and address soundness matters, the following changes are proposed:
- Update evidence.
 - Incorporate flexibility.

018 Policy ES3

Policy ES3: Renewable Energy Networks and Shared Energy Schemes

- 18.1 Strata Homes welcomes the ambitions to reduce carbon emissions. However, Policy ES3 requires flexibility to be in accordance with the Framework.

Justification

- 18.2 Policy ES3 states that new schemes will be required to connect to District Energy Networks will, where feasible, and for significant new developments to prepare a feasibility assessment for establishing a new network.
- 18.3 The Viability Appraisal assesses £5,000 per unit for housing and £3,000 per unit for flatted developments. However, there is little justification or evidence for these assumed costs and the Viability Appraisal states that there are few published costs.
- 18.4 The Framework at paragraph 16 point d) states that Plans should: *“contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.”* It is clear then that policies should be clear and make sense to decision makers. The current wording of this policy should therefore be amended to incorporate flexibility.

Proposed Change

- 18.5 To overcome the objection and address soundness matters, the following changes are proposed:
- Amend the policy to incorporate flexibility.

019 Policy ES4

Policy ES4: Other Requirements for the Sustainable Design of Buildings

- 19.1 Strata Homes supports the reduction in carbon emissions, however policies should be flexible and reflect national policy and guidance.

Justification

- 19.1 Policy ES4 requires, where relevant, to maximise the incorporation of sustainable design features, including green, blue or brown roofs. The terminology of the policy is vague “expected to maximise” and “as relevant” and should be amended to be clear, especially to maximise but only where relevant.
- 19.2 The Framework at paragraph 16 point d) states that Plans should: *“contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.”* It is clear then that policies should be clear and make sense to decision makers. The current wording of this policy is unclear and vague and should therefore be amended to be clear and incorporate flexibility.
- 19.3 Furthermore, the Viability Appraisal does not appear to include sufficient provision for Policy ES4. It only appears to consider green roofs and makes only a small percentage allowance for housing and flatted schemes.
- 19.4 Therefore, there is no evidence supporting the policy approach or an assessment of its implications, especially in a Local Plan that is focussed on brownfield urban sites.

Proposed Change

19.5 To overcome the objection and address soundness matters, the following changes are proposed:

- Update evidence.
- Amend policy to for clarity purposes.
- Incorporate flexibility.

020 Policy NC3

Policy NC3: Provision of Affordable Housing

- 20.1 Strata Homes does not consider Policy NC3 accords with national policy and guidance.

Justification

- 20.2 Policy NC3 states that a contribution towards the provision of affordable housing will be required from sites with the capacity of 10 or more dwellings.
- 20.3 The policy then continues indicating a minimum requirement ranging from 10% to 30% dependent on the affordable housing market area. It also sets the affordable housing tenure mix, which should be 25% First Homes, 25% social rent or equivalent affordable tenures and 50% affordable rent or housing for intermediate or equivalent affordable tenures.
- 20.4 Strata Homes is concerned, as highlighted in response to Policy SP1 that the affordable housing need will not be met in the City and the proposed housing requirement and Spatial Strategy is insufficient.
- 20.5 The Sheffield and Rotherham SHMA (July 2019) identifies an annual shortfall in affordable units of 902 dwellings in Sheffield, it also recommends as a guideline of 25% of units could be shared ownership, affordable rent or other intermediate products. It suggests that the majority of affordable homes should be homes for social rent.
- 20.6 However, the Sheffield Whole Plan Viability Appraisal identified viability issues in Sheffield. The Viability Appraisal states that when assessed under the methodology set out in the PPG development in the Central Area, East and North East is unviable. The Appraisal also states that Private Rented Schemes are unviable. The Appraisal also states that the Council should be cautious about relying on development in the Central Area, and East and North East and on brownfield sites in the Urban West, Stocksbridge/Deepcar, and Rural Upper Don Valley and Chapelton/Ecclesfield areas to deliver its housing requirement.
- 20.7 Strata Homes supports the need to address the affordable housing requirements of the City. However, the Framework is clear that the derivation of affordable housing policies must not only take account of need but also viability and deliverability. The Council should be mindful that it is unrealistic to negotiate on a site-by-site basis because the base-line aspiration of a policy or

combination of policies is set too high as this will jeopardise future housing delivery. The Viability Appraisal highlights the issues with viability in the area, and the conclusions highlight the challenges faced by the Council in terms of preparing policy and for developers providing the full policy requirements.

- 20.8** The Framework is also clear that where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership. Strata Homes is concerned that evidence is not available to demonstrate this and the proposed policy may not deliver this requirement.
- 20.9** Strata Homes consider that further sites are needed to be identified to meet the affordable housing needs in the City.

Proposed Change

20.10 To overcome the objection and address soundness matters, the following changes are proposed:

- Provide evidence and clarification
- Amend the policy to incorporate flexibility.
- Allocate the site at Townend Lane, Stocksbridge for housing use.

021 Policy NC5

Policy NC5: Creating Mixed Communities

- 21.1 Strata Homes does not consider Policy NC5 accords with national policy and guidance.

Justification

- 21.2 Policy NC5 requires that development of 30 or more dwellings in the City Centre and other highly accessible locations that no more than half the homes consist of one-bedroom apartments and studios. It also requires a greater mix of house types on developments of 30 or more dwellings in other locations to include homes for larger households.
- 21.3 Strata Homes understands the need for a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the local area.
- 21.4 The Framework at paragraph 16 point d) states that Plans should: *“contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.”* It is clear then that policies should be clear and make sense to decision makers. The current wording of this policy should therefore be amended to incorporate flexibility.
- 21.5 Strata Homes recommends a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site. Such an approach would ensure that the scheme is viable and provides an appropriate mix for the location and market.

Proposed Change

- 21.6 To overcome the objection and address soundness matters, the following changes are proposed:
- Amend the policy to incorporate flexibility.

022 Policy NC8

Policy NC8: Housing Space Standards

22.1 Strata Homes does not consider Policy NC8 accords with national policy and guidance.

Justification

- 22.1 Policy NC8 states that all new housing should comply with the Government’s nationally described space standards and any subsequent updates. This is verified in the supporting text which states that all new housing should comply with the optional nationally described space standards as well as the provision for outdoor amenity space.
- 22.2 Strata Homes would like to highlight that any policy seeking to implement national space standards for new homes needs to be accompanied by appropriate justification and evidence. The enhanced standards, as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a ‘need to have’ rather than a ‘nice to have’ basis. PPG (ID 56-020) identifies the type of evidence required to introduce such a policy.
- 22.3 Strata Homes is generally supportive of providing homes that are suitable to meet the needs of older or disabled people. However, there needs to be appropriate evidence and suitable flexibility in the policy to address site specific considerations, including topography and flood risk/drainage. Such site specific factors is in accordance with national policy and guidance.
- 22.4 Furthermore, if the Council wishes to adopt the higher optional standards for accessible and adaptable homes the Council should only do so by applying the criteria set out in the PPG. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability.
- 22.5 In preparing such a policy the Council should also be aware that the Government is seeking to raise accessibility standards through Building Regulations to M4(2) as a minimum for all new homes.

22.6 Strata Homes is concerned with regards to the interaction of this policy with other policies in the emerging Local Plan and the ability for sites to accommodate the aspired number of new homes. Strata Homes consider that further sites are needed to be identified to deliver the requisite number of homes in the Plan.

Proposed Change

22.7 To overcome the objection and address soundness matters, the following changes are proposed:

- Provide evidence and clarification.
- Amend the policy to incorporate flexibility.
- Allocate the site at Townend Lane, Stocksbridge for housing use.

023 Policy NC9

Policy NC9: Housing Density

- 23.1 Strata Homes is concerned that the interaction of this policy with other policies in the Plan shows that this policy is inconsistent with the Spatial Strategy and the Plan is unsound.

Justification

- 23.2 Policy NC9 establishes the density requirements for different areas of the City, which ranges from 70 dwellings per hectare (dph) within or near to the Central Area, 50 to 80dph within or near to District Centres, 40 to 70dph within easy walking distance of tram stops and high frequency bus routes, 30 to 50dph in remaining parts of the urban area and 30 to 40dph in the rural areas. It allows for exceptions to these requirements to reflect the character of a Conservation Area or to protect a heritage asset, to create different density character areas on larger development sites or are necessary to protect an environmentally sensitive area.
- 23.3 Strata Homes consider that flexibility is important to this policy, as its interaction with other policies in the Plan, such as on site Public Open Space, green and blue infrastructure, tree planting, BNG, residential space standards will all affect potential housing densities.
- 23.4 Strata Homes suggest that further flexibility is incorporated and a review of densities occurs in terms of potential housing provision within the proposed Plan. Strata Homes suggest that further sites are needed to be identified to address the reduction in potential homes due to the interaction of policies.
- 23.5 The Framework at paragraph 16 point d) states that Plans should: *“contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.”* It is clear then that polices should be clear and make sense to decision makers. The current wording of this policy should therefore be amended to incorporate flexibility.

Proposed Change

23.6 To overcome the objection and address soundness matters, the following changes are proposed:

- Amend the policy to incorporate flexibility.
- Allocate the site at Townend Lane, Stocksbridge for housing use.

024 Policy GS6

Policy GS6: Biodiversity Net Gain

- 24.1 Strata Homes is concerned that Policy GS6 does not accord with national policy and guidance and is therefore unsound.

Justification

- 24.2 Policy GS6 states that a minimum of 10% gain from pre to post development must be achieved for all habitat types evident on site. Furthermore, Policy GS6 sets out criteria for where in excess of a 10% net gain may be required.
- 24.3 Stem d) of Paragraph 174 of the Framework states that planning policies should “minimise impacts on and provide net gains for biodiversity”. If a development delivers the 10% minimum requirement by law it will ensure that paragraphs 174(d) of the Framework is addressed as it will ensure a net gain. As such any level above this is not necessary to make a development acceptable in planning terms and cannot be made a requirement in the Local Plan. Therefore, Strata Homes does not consider that requiring Biodiversity Net Gain above a minimum of 10% meets the tests set out in paragraph 57 of the Framework.
- 24.4 As the Government note on page 9 of their response to the consultation on Biodiversity Net Gain, they considered 10% to deliver the right balance between “ambition, achieving environmental outcomes, and deliverability and cost to developers”.
- 24.5 Strata Homes consider it should be for the developer to decide whether they go beyond 10%. This is a position the Government also supports stating on page 9 of their response to the consultation on net gain that the 10% should not be a cap on the aspirations of developers who want to go further “voluntarily”. It is important to remember that it is impossible to know what the cost of delivering net gain is until the base level of biodiversity on a site is known and consequently what is required to achieve a 10% net gain. On some sites this may be achievable on site with no reduction in developable area, for others it may require a large proportion of it to be addressed offsite, or a significant reduction in the developable area.
- 24.6 Strata Homes therefore considers Policy GS6 should be amended to achieve only a 10% Biodiversity Net Gain.

Proposed Change

24.7 To overcome the objection and address soundness matters, the following changes are proposed:

- Amend Policy GS6 to only achieve a 10% Biodiversity Net Gain.

025 Policy GS7

Policy GS7: Trees, Woodlands and Hedgerows

- 25.1 Strata Homes is concerned that Policy GS7 is requiring significant new tree planting, which could affect the delivery of developments on tightly constrained urban sites.

Justification

- 25.2 Policy GS7 requires 1 tree per dwelling. Strata Homes supports Green and Blue Infrastructure and the need for further tree planting. However, the interaction of this policy alongside the need to deliver significant new housing on urban brownfield and recycled sites may render some sites undeliverable.
- 25.3 Strata Homes considers that such ambitions for new tree planting as part of Biodiversity Net Gain can only be achieved through larger sites.
- 25.4 Strata Homes is concerned with regards to the interaction of this policy with other policies in the emerging Local Plan and the ability for sites to accommodate the aspired number of new homes. Strata Homes consider that further sites are needed to be identified to deliver the requisite number of homes in the Plan.
- 25.5 Strata Homes therefore considers that their site at Townend Lane, Stocksbridge should be allocated for housing purposes.

Proposed Change

- 25.6 To overcome the objection and address soundness matters, the following changes are proposed:

- Amend policy to be less prescriptive.
- Allocate the site at Townend Lane, Stocksbridge for housing use.

026 Policy DC1

Policy DC1: The Community Infrastructure Levy (CIL) and Other Developer Contributions

- 26.1 Strata Homes is concerned that the evidence base and the Viability Appraisal has limited information in relation to the assessment of Policy DC1.

Justification

- 26.2 Policy DC1 states that non-residential schemes will be required to contribute to transport infrastructure in accordance with Policy CO1 towards flood mitigation measures in accordance with Policy GS9.
- 26.3 The Viability Appraisal states that £1,500 per residential unit has been assumed for contributions towards infrastructure, which was provided in an email in April 2019 (according to footnote 66). Strata Homes is concerned that there is no supporting evidence for this assertion or how it was derived.
- 26.4 Strata Homes considers that further evidence is required and be consulted upon in relation to the Viability Appraisal.
- 26.5 Furthermore, Policy DC1 does not include flexibility in relation to viability-led planning applications in case there are changed circumstances or unknowns during the lifetime of the Plan. Such an approach is in full accordance with the Framework.

Proposed Change

- 26.6 To overcome the objection and address soundness matters, the following changes are proposed:

- Update evidence base.

Appendix 1: Housing Site Analysis

Site Reference	Site Name	No. of Dwellings	Comments	Estimated 5YS	Developable
SV10	Land at Sylvester Street	108	No evidence of planning permission onsite. Only refused and withdrawn applications. No evidence of availability. Currently used as a car park.	0	No.
NWS12	Former British Glass Labs, Crookesmoor	76	There is a implemented consent on this site for 76 units from 2005. No evidence of availability or deliverability.	0	No.
SES12	Land at Vikinglea Drive	90	No Planning Permission. Site is unlikely to come forward quickly. Requirement to gain planning permission and site set up will delay delivery. Low priced market area. Allowance for one outlet.	45	Yes.
HC04	NCP Furnival Gate Car Park	100	No Planning permission. Risk of contamination. Existing car park and businesses may need to be relocated. There is a planning refusal onsite. No evidence to suggest that car parking is not required in this location – no plans for replacement car parking.	0	No.

Site Reference	Site Name	No. of Dwellings	Comments	Estimated 5YS	Developable
SU06	Site of 1-7 Allen Street	100	Planning appears to have expired. There are multiple ownerships across the site. There are existing businesses operating across the site.	0	No.
SV09	3-7 Sidney Street	117	No Planning permission in place. The site is currently used as a car park and there is no evidence of availability. There is no assessment of whether car parking is required in this location.	0	No.
ES27	Land at Kenninghall Drive	120	No planning permission in place. The site is unlikely to come forward quickly. Requirement to gain planning permission and site set up will delay delivery onsite. Low price market area. Allowance for one outlet.	45	Yes.
SV08	Mecca Bingo	121	No planning permission in place. Bingo Hall operating onsite. There is no evidence of availability. Therefore highly unlikely to come forward in the short term. Heritage assets in close proximity may reduce unit numbers.	0	No.
HC15	Land and Buildings at	136	No planning permission in place. There are businesses currently operating onsite. Heritage assets in proximity	0	No.

Site Reference	Site Name	No. of Dwellings	Comments	Estimated 5YS	Developable
	Fitzwilliam Street		to the site may reduce capacity further. Unlikely to come forward in the short term.		
ES25	Land to the North of Bawtry Road	147	No planning permission in place. The site is a former sports ground and gym. The surrounding area has a significant deficiency in terms of open space provision. There is no evidence of consultation with Sports England regarding the loss of sports pitches. There are heritage assets in close proximity to the site. The site is highly unlikely to come forward in the short term.	0	No.
SV07	Buildings at Shoreham Street	149	No planning permission in place. The Strategic Flood Risk Assessment shows that this site would have a Significant negative impact and therefore the suitability of the site is questioned. The site has issues relating to contamination which are yet to be resolved. There is no evidence of availability. Existing business uses onsite will need to be re-located.	0	No.
SES11	Manor Top Army Reserve Centre	151	No planning permission in place. Site is within a hazardous installation consultation zone. The site contains a historic landfill site. The site appears to	0	No.

Site Reference	Site Name	No. of Dwellings	Comments	Estimated 5YS	Developable
			currently be in use and the existing use will need to be relocated. There is no evidence of availability onsite.		
SES10	Land to the East of Moor Valley Road	151	No Planning permission in place. The site is in an ecologically important area (LWS). There may be archaeological remains to be recorded. Likely to be delay in delivery of this site.	0	Yes
NWS10	Land at Outbridge Lane	169	Planning permission for 80 dwellings but no delivery. Existing businesses still appear to be operating onsite and will require relocating. There are TPO's which will be affected by development here. Heritage assets and flood risk concerns may reduce capacity and delay delivery onsite.	0	Yes
SD03	Site A Stocksbridge Steelworks	190	Planning permission appears to be expired. No development work has begun. It is likely that there is significant contamination and land fill affecting the site. There is no recent evidence of availability	0	No.
KN03	Wickes, Rutland Road	191	No Planning permission in place. There is an existing Wickes Store operating	0	No.

Site Reference	Site Name	No. of Dwellings	Comments	Estimated 5YS	Developable
			onsite and therefore no evidence of availability.		
KN04	Land at Russel Street	200	No Planning permission in place. There are existing businesses operating onsite including a Gym and a Car Park. There is therefore no evidence of availability. There is a risk of contamination onsite which will likely delay delivery. There may be significant archaeological assets onsite which may delay delivery of units.	0	No.
ES24	Manor Sites 12/13	210	Planning permission in place. Development appears to have begun. One outlet therefore likely to be delivered at 30 dpa.	150	Yes.
HC13	999 Parcel Ltd	213	Planning permission in place. This only allows for 144 Apartments. Existing business operating from site. Likely to delay delivery.	144	Yes.
SU12	134 West Bar	216	No Planning Permission. The site is within multiple ownerships and businesses are currently operating from the site. There are heritage assets which will likely reduce the number of units delivered. There is a risk of contamination onsite. There is no evidence of availability.	0	No.

Site Reference	Site Name	No. of Dwellings	Comments	Estimated 5YS	Developable
SES09	Former Newstead Estate	218	Planning permission in place. Construction appears to have begun. One outlet will allow approximately 30 dpa.	150	Yes
SU08	Buildings at Scotland Street	225	No Planning permission in place. A number of businesses are currently operating onsite. There is a risk of contamination. There are heritage assets in close proximity to the site. The site is in multiple ownerships, there is no evidence of availability.	0	No.
SES28	Woodhouse East	258	No Planning permission in place. The site is likely to have significant ecological value. The site may contain best and most versatile agricultural land which may preclude development. The site is within close proximity to a landfill site. The site was allocated in the UDP and has yet to come forwards.	0	Yes.
SS17	Norton Aerodrome	270	No Planning permission in place. There are existing open space facilities onsite which should be retained. There is a likelihood of contamination onsite which will delay delivery of the site. There are heritage assets onsite which will be harmed by development. The site is likely to have ecological	0	Yes

Site Reference	Site Name	No. of Dwellings	Comments	Estimated 5YS	Developable
			value. The site is likely therefore to deliver a lower yield of houses.		
SES08	Land at Silkstone Road	272	No Planning permission in place. The site is likely to have significant ecological value which will reduce capacity. There is a risk of contamination which may delay delivery of units. Assume one outlet due to the size of scheme a sales rate of 30dpa plus two years to obtain planning permission and six months before the site begins delivering units onsite.	75	Yes
SV04	Decathlon Eye Street	303	No Planning permission in place. There is an existing Decathlon store operating onsite and therefore no evidence of availability. There are heritage assets in close proximity to the site which will reduce the site capacity or preclude development. There is a risk of contamination on site which may delay or preclude development.	0	No
CW09	Land to North of Derek Dooley Way	336	No Planning permission in place. This site is owned by National Grid and may still be required. There is no evidence of availability. The site is likely to be contaminated which may	0	Yes.

Site Reference	Site Name	No. of Dwellings	Comments	Estimated 5YS	Developable
			delay or preclude development. The development of this site will impact upon heritage assets which may mean the capacity of the site is reduced.		
SU04	Site of Former HSBC	355	Following initial demolition and preliminary work on foundations no progress has been made for several years. There are clearly deliverability issues affecting this site which may mean that the site will not come forward within the plan period.	0	No.
LR02	Buildings at Sheaf Gardens	367	No Planning permission in place. There are a number of existing businesses currently operating onsite which includes a Gym. There are a number of landownerships covering the site and no evidence of availability of the site to accommodate new accommodation.	0	No.
ES23	Globe II Business Centre 128 Maltravers Road	371	Planning permission is in place for 85 care home units on part of the site. The remaining part of the site has no planning permission and there is no evidence of availability. Site may be contaminated which will delay delivery. No proposal for apartment scheme. The	0	No

Site Reference	Site Name	No. of Dwellings	Comments	Estimated 5YS	Developable
			developer has confirmed no intention to develop the site.		
SD02	Former Steins Tip, Deepcar	428	Planning permission in place but delays to construction and delivery of units. Assume one outlet at 30 dpa will deliver units in the plan period.	150	Yes.
LR01	B & Q Warehouse Queens Road	466	No Planning Permission in place. There is currently a B&Q Store operating onsite and therefore no evidence of availability. The site is affected by flood risk. There is a risk of contamination onsite which may delay or preclude delivery.	0	No.
KN36	Land at Penistone Road	572	There is no planning permission in place. The site is currently vacant previously developed land. The site is likely to be contaminated which may delay or preclude delivery. There are multiple ownerships onsite and therefore no evidence that the site is available. This is a large site without planning permission and is therefore unlikely to deliver in the first five years of the plan period.	0	No.
ES22	Attercliffe Canalside	596	There is no planning permission in place. The site is within a hazardous installation consultation	0	Yes.

Site Reference	Site Name	No. of Dwellings	Comments	Estimated 5YS	Developable
			<p>zone. There are nearby heritage assets which will be impacted upon by the development and will reduce the sites capacity. This is a large scheme with significant constraints to overcome without planning permission in place and therefore is unlikely to deliver in the first five years of the plan.</p>		
HC08	Moorfoot Building	714	<p>The site is currently home to Sheffield City Council offices. There is no planning permission in place which demonstrates delivery. The site is potentially contaminated which may delay or preclude development. An underground National Grid Power cable runs underneath the site. There are areas of the site which are within flood risk zones. This site is currently in use as an office for the Council, it is large and does not currently have planning permission. Therefore, it is unlikely to be delivered in the plan period.</p>	0	No.
HC03	Land and Buildings at St. Mary's Gate	1006	<p>This site does not currently have planning permission. The site is within multiple ownerships and there is no evidence of the site being available. There are businesses currently operating onsite such as</p>	0	No.

Site Reference	Site Name	No. of Dwellings	Comments	Estimated 5YS	Developable
			<p>Office Outlet. The site is within an area of Flood Risk which may reduce the capacity of the site. There is a risk of contamination on site. This is a very large scheme without planning permission and is therefore unlikely to deliver units within the plan period.</p>		

Appendix 2: Advocacy Report

(Bound Separately)

Appendix 3: Stocksbridge Housing Market Assessment

(Bound Separately)

Strata

Townend Lane, Stocksbridge/Deepcar

Advocacy Report

Revision B | Jan 2021



Benefits



Optimum location for growth



New homes to support employment growth



Approx. 100 new homes to meet Sheffield's Housing Need



Integration of new housing within the landscape



Regeneration of Stocksbridge

Introduction

This Advocacy Report illustrates the vision for Townend Lane and seeks its allocation for housing within the emerging Sheffield Local Plan. The site is proposed to deliver new housing within a landscaped setting in a sustainable location in Stocksbridge/Deepcar.

About Strata

Strata is a house builder and family business, which is focussed on building a legacy, design and quality. Strata makes homes and therefore exists to make a new way of living. A lifestyle that demands more from the everyday.

Strata is a Yorkshire business. Founded in 1919 as Weaver Construction has now grown into the Strata brand today, and the impact made by four generations of family continually influences how the business is shaped.

Strata is about more than just bricks and mortar. It is about creating a unique and personalised space to live and grow, in a community of likeminded individuals.

Townend Lane

Townend Lane provides an opportunity to develop much needed high quality homes in a sustainable location close to existing services and facilities, employment opportunities and public transport routes.

The proposed scheme can deliver new homes within a landscaped setting and green network, creating a healthy lifestyle and new way of living.

Townend Lane can deliver significant benefits within the vision for growth that the city and region aspires. This site's the ideal place to facilitate the further renaissance of Stocksbridge/Deepcar through the provision of new homes attractive to a highly skilled workforce.

Scope

This Advocacy Report sets out the context and ambitions for Townend Lane before analysing and explaining the site's availability, suitability and achievability and therefore deliverability in the context of the National Planning Policy Framework (the Framework).

An indicative masterplan for the site will show the potential for the site including green and blue infrastructure, movement and connectivity. The proposal provides significant benefits which are explained throughout the report including the provision of a range and choice of new high quality homes.





Stratas' Philosophy

Being a family owned business for over a century, Strata have developed certain traits over time. Continuously striving to become better is definitely one of them and a desire to improve people's lives drives everything Strata do. They are passionate about design and detail but, above all, Strata care greatly about every single home that they build.

Their pioneering spirit is founded upon years of experience and a genuine motivation to do the right thing.

Exemplar Development

360 is Stratas' development of zero carbon homes in Chesterfield. Here they designed a range of high quality, zero carbon homes at affordable prices.

The sustainable timber engineered homes are constructed offsite, ensuring efficiency and the highest quality standards. The closed panel design helps to keep the heat in and the draughts out, this means the homes cost significantly less to heat, and exceeds the standards of a traditionally built home.

Strata believe a home should provide a safe place and protect from external influences which may adversely affect wellbeing and actively promote good health. Reducing the running costs of the home will enable the resident to have more disposable income, reducing fuel poverty and having a positive impact on the local economy.

Sustainable Design at Townend Lane

Being close to existing services and facilities as well as public transport, potentially a reinstated commuter train service to Sheffield and the wider City and region makes the Townend Lane site the ideal location for new homes.

This will support the new residents in making sustainable movement choices. The aspirations of the town to provide new housing to attract highly skilled workers and businesses must be matched by the provision of high quality sustainable new housing.

The Townend Lane site is an opportunity to create a truly sustainable housing development for the twenty-first century which can set the bar for sustainability in Stocksbridge/Deepcar and the wider city region.

Drivers for Sheffield

Sheffield has ambitious plans to become a highly successful, sustainable modern European city in which its residents can thrive, learn new skills, raise their families, start new business ventures in a green biodiverse setting in close proximity to the National Park.

Townend Lane aims to deliver high quality sustainable new homes. This is aligned to the strategic objectives of the city. The drivers of which are a move towards a cleaner and greener city. For example The Green City Strategy is for a low carbon, resilient and sustainable Sheffield.

The strategy acknowledges that the move towards a lower carbon and cleaner economy would enable the city to grow and evolve whilst at the same time improving the environment and the quality of life of the residents.

Sustainability and climate change resilience is a priority for the strategy, which contains 12 priorities, including: reducing impact on the climate; a climate resilient city; sustainable and affordable energy; modern, reliable and clean journeys; clean air for all; and a green and innovative economy.

The Sheffield Green Commitment reflects a similar approach, which has been developed by the Sheffield Green Commissioners and has developed a vision of a sustainable city based on the following four principles:

Connected City: A city with transportation systems that are efficient and affordable, reliable and clean, simple and intuitive, networked and integrated, and low emission.

Transformative Energy: An energy secure city with transformative affordable, clean, efficient, low-emission, networked, renewable, resilient, simple and locally owned energy solutions.

European Green City: Sheffield is a green city both in its urban core and its surrounding landscape and this is part of its attractiveness and distinctiveness. A city with an accessible, ambitious, bold, biodiverse, equitable and high quality, well-designed formal and informal landscape that is sustainable to maintain and delivers a myriad of benefits.

Learning City: Sheffield is committed to continuous learning about how to give the city a smart and sustainable future. This includes learning from and collaborating with other cities and education institutions.

These themes mean a focus towards development sites that are accessible to employment, retail and leisure spaces, and also accessible to public transport routes. These principles also highlight opportunities for place making and place shaping and the creation of sustainable and high quality new homes.

Townend Lane embodies these strategies and can help to move towards all of these goals. Importantly, the site is close to services, facilities, employment opportunities and is accessible to the region by public transport, including the potential reintroduction of commuter trains between Stocksbridge and Sheffield with the reopening of the Don Valley Line.

This alongside the ability to create new and enhanced green routes and improve accessibility to green spaces close to the site to create a healthy environment for residents and the wider population.



connected City

low-emission
digitally connected
affordable
integrated
clean

Transformative energy



renewable
secure city
low-emission
locally owned
energy solutions

European green City

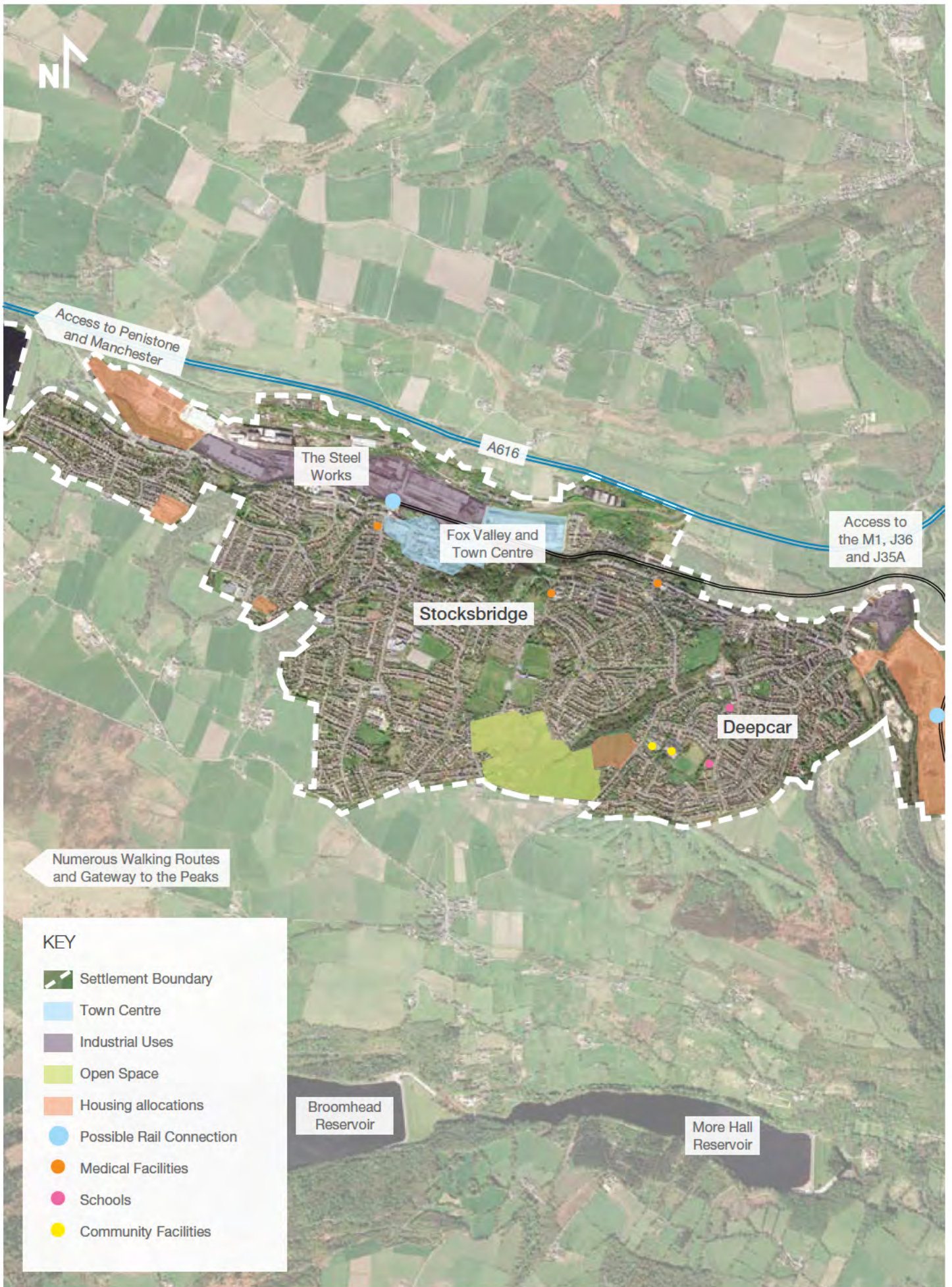


attractive
ecosystem
sustainable
outdoor city
accessible

learning city



create
long view
solve
connect
evaluate
learn



Stocksbridge/Deepcar Renaissance

Stocksbridge/Deepcar is a focus for growth. The area requires regeneration and investment to realise the strategic ambitions of the town. In recent years there has been a lack of housing growth and the population is getting older. Efforts are ongoing to reverse this trend, deliver more housing and attract high quality jobs and to exploit its unique position as the “Gateway to the Peaks.”

The Steel Works which dominated business activity in the town is still highly important. However, there is an understanding that there is a need to diversify the economy, provide new housing and employment space and to encourage start-ups and new businesses to move in.

Efforts have already begun in earnest with the redevelopment of the Fox Valley site into an attractive retail offering and residential development. There are also proposals to transform the high street on Manchester Road which will help to attract new businesses to the town and restore a sense of aspiration.

Through the Towns Fund Initiative there is an opportunity to capitalise on Stocksbridge’s attractiveness as a place to live and to create a more dynamic and resilient economy, attract businesses and create jobs in high value sectors. The overarching vision “is to make Stocksbridge strong, vibrant and fit for future generations and to ensure local people benefit from these changes through six strategic priorities:

- To create a vibrant and attractive town
- To develop a strengthened and diversified economy
- To provide enhanced learning

- opportunities
- To be a more accessible town
- To provide first class sport, leisure, cultural and community facilities
- To deliver clean growth”

Stocksbridge/Deepcar has a strong local identity and resilience due to its location to the north of Sheffield and local geography, however this can also cause disadvantage to the local population. This is recognised locally and projects and schemes are planned to tackle these issues by delivering a community bus network, funicular railway connecting Fox Valley to the high street, promoting e-cycling and enhanced walking and cycling routes through the town connecting to the Upper Don trail and around the reservoirs.

Furthermore efforts continue to progress towards reinstatement of a commuter rail service along the Don Valley Railway line to Stocksbridge, with exploratory funding announced in the Government’s budget in Autumn 2021 from the “Restoring Your Railways Fund.” Restoring the commuter rail service will bring the town within 15 minutes of Sheffield City Centre, which will greatly improve economic prosperity and access to good jobs for the residents of Stocksbridge/Deepcar.

There are opportunities to strengthen future economic prosperity through investing in the environment and in health and wellbeing projects. Improvements to Oxley Park having commenced utilising resources from the accelerated Towns Fund initiative. Providing better facilities for community sport will enable more local people to be physically active improving health and wellbeing alongside community relations.

However, to deliver the ambitions that Stocksbridge requires there needs to be the delivery of new housing. New Housing has been limited in Stocksbridge in recent years. This has limited population growth and lead to an ageing population. Good quality new homes in the right locations will provide accommodation for the high skilled workforce the town wishes to attract alongside creating a critical mass of population for the new infrastructure and facilities/services within the town.

The success of the regeneration initiatives in the town will enable Stocksbridge/Deepcar to become a sustainable thriving market town.



The site adjoins the settlement boundary



600m
From the nearest school



The site has good access to a variety of independent shops



Access to stations at Chapel Town with connections to Sheffield, Barnsley, Wakefield, Leed and beyond.



Short walk to local medical centres



Stocksbridge has a number of sports clubs and access to extensive walking routes



There are a number of bus stops within 100m of the site



Stocksbridge Town Centre has a number of food and beverage establishments

Why Townend Lane?

The Townend Lane site provides an opportunity to assist and build upon the renaissance of Stocksbridge/Deepcar by delivering the high quality new homes demanded by the new high skilled workforce which the town wishes to attract. The site is in a highly sustainable location within walking and cycling distance of employment opportunities, shops and services.

The site can assist with delivering the high quality new homes the area needs to attract the high skilled workforce to the town. This will also assist in creating the critical mass of population to deliver the new infrastructure the town seeks to develop, including reopening the railway line to Sheffield, which will enhance the connectivity of the area.

The site is currently within the Green Belt, as defined by the Unitary Development Plan (UDP). However, the Green Belt Review (September 2021) scores the site favourably when compared to other options against the Green Belt purposes.

The site is currently agricultural fields with hedgerows and semi mature trees along Common Lane. The settlement form in this area lends itself to the formation of a robust long term Green Belt boundary to the south east of Stocksbridge/Deepcar. The site has no technical constraints and there are no heritage, ecological or landscape designations which would preclude its development.

The site is adjoining the settlement boundary, with good access to local amenities, including schools and a doctor's surgery. Shops and services within Stocksbridge include a Lidl, Co-op, several local independent shops, hairdressers, restaurants, pubs a medical centre and sports clubs, which are all within walking distance of the site.

Royd Nursery Infant School and Deepcar St John's CE Junior School are within a 5 minute walk of the site, Stocksbridge High School is also within walking distance of the site. All of these schools are currently listed as under subscribed.

Approximately 300m from the site are bus stops with regular services to Sheffield Centre. The site is approximately 2.2km (5 minutes drive) from Stocksbridge bypass (A616) and 9km (15 minutes drive) from Junction 36 of the M1 which provides access to the wider motorway network. This connectivity creates the opportunity to access employment in the local area.

Furthermore, the site is accessible to the future reopening of Stocksbridge railway station and can assist in creating the critical mass of population for the new facility.

The site is also well connected to Chapeltown and Penistone railway stations, which are a 15 minute drive away, whilst Sheffield railway station is a 30 minute drive and is also accessible by bus.

The site is available, suitable and achievable, which can deliver new high quality new homes that the area needs to contribute towards the regeneration and urban renaissance of the town. The site is a logical and deliverable extension on the edge of Stocksbridge/Deepcar. Strata is a Yorkshire based housing developer, with a great track record and net zero ambitions and are promoting the site for inclusion in the emerging Local Plan. There are no significant constraints which would preclude the site coming forwards and the site is in a suitable location which will provide a new long term and robust southern boundary to the Town.

Housing Need

There is a significant and recognised housing crisis within the UK. The country needs to provide around 300,000 homes per year to keep up with population growth and to start to tackle years of undersupply. Housing provision within Sheffield over the Local Plan period should be approximately 3,000 dwellings per annum to support planned future economic growth.

The National Planning Policy Framework states that local authorities should meet their objectively assessed housing needs in full and to boost significantly the supply of housing. The emerging Local Plan recognises the need to deliver a supply of housing to support economic growth to create sustainable communities.

The recent economic crisis including the Covid-19 Pandemic and subsequent recovery have greatly diminished projected economic growth. Therefore schemes that assist economic and housing growth are high on the Government's agenda. The Government's policy agenda through the Framework, Ministerial Statements, Budgets and Planning White Paper recognise the importance of housing and the significant economic imperative of encouraging new development proposals.

Sheffield is the driving force in the Sheffield City Region. The Region forms a key economic area between the rest of Yorkshire and the North of England, and the Midlands and the South.

The Government's current standard methodology for the assessment of housing need including 35% uplift for urban centres indicates that Sheffield should provide 2,877 homes per annum. However, this does not allow for economic growth and the Strategic Economic Plan (SEP) or affordability issues. The SEP vision aims by 2040 to create 33,000 extra people in higher level jobs and an extra £7.6bn growth in Gross Value Added in the economy.

The SEP vision also sets out to grow wages and for people to live longer with healthier lifestyles and for a net zero carbon city region. Given that Sheffield is the largest conurbation, and fourth largest city in England it is reasonable that the city allow for significant economic growth to raise the aspirations for the region, reflecting the SEP's target and to deliver circa 2,400 to 3,000 new homes in Sheffield during the Local Plan period.

The development of new housing will bring forward additional economic benefits to Sheffield. The relationship between economic performance in an area and housing is complex, but having the right quantity, quality and balance of housing in an area is necessary for economic growth.

The development of new housing can therefore support local economic growth, both through direct job creation through the construction phase of the scheme, but also through the increased population which will create sustainable local jobs from the increased demand for goods and services. This provides an important development opportunity for Sheffield.

According to the latest position paper (25th October 21) Sheffield City Council can demonstrate a 4.0 year supply against a requirement of 2,923 dwellings per annum, plus 5% buffer. This includes a significant proportion of student accommodation which means the true supply figure is actually approximately 3 years. Against this backdrop it is clear that exceptional circumstances exist and the Council must look to release Green Belt land to meet its growth aspirations.



Green Belt Justification

The housing needs of Sheffield and the City Region require that Sheffield City Council review the Green Belt Boundaries. The land at Townend Lane presents an opportunity to positively adjust the Green Belt boundary and form a new robust and long term boundary.

Sheffield is enveloped by the South Yorkshire Green Belt which acts as a significant constraint on housing delivery. Paragraph 140 of the Framework considers that Green Belt boundaries can change “in exceptional circumstances”. Such a circumstance exist through the significant undersupply of housing in Sheffield. To meet housing and economic growth aspirations Sheffield City Council will need to revise the Green Belt boundaries for the emerging Local Plan and beyond to provide the new boundaries with some permanence. The site has been assessed by the Council as part of the Green Belt Review (2021) which scores the site favourable when compared with other options.

The Framework establishes five purposes for including land within the Green Belt. Having reviewed the site at Townend Lane against the purposes it is clear that the allocation of the site for housing will not undermine the integrity of the Green Belt.

1. To check unrestricted sprawl.

The site is contained by the surrounding landform, vegetation and existing built form and will not lead to unrestricted sprawl or encroachment. The site is located on the edge of Deepcar with residential development located to the north and a natural robust Green Belt Boundary to the south and west in the form of Stocksbridge Golf Course and to the east in the form of a strong landscape buffer.

2. To prevent neighbouring towns from merging

The site would not result in merging, the nearest settlement to the south, Wharncliffe Side, is separated by Birtholmes Wood and More Hall Reservoir.

3. To assist in safeguarding the countryside from encroachment

The site is relatively contained by topography, and existing boundary treatment. The perception of any encroachment into the countryside is minimised by the level of urban influence at this location and the relative containment of the site.

4. To preserve the setting of historic towns

The site will have no impact on the setting of a historic town.

5. To assist in urban regeneration

There are no deliverable brownfield sites in Stocksbridge/Deepcar. Development here will not detract from efforts to regenerate the area. In fact, it will assist these efforts by increasing footfall and providing new homes for highly skilled workers.

The proposed new Green Belt boundary will be defined by the golf course to the south and Townend Lane to the east. The eastern boundary will be greatly enhanced to provide a permanent robust boundary. This will accord with the Framework, ensuring the Green Belt is clearly defined using readily recognisable features, reinforcing the urban context whilst providing a robust boundary for the future.

The site boundaries can be reinforced through additional planting to provide an effective transition between the development and the countryside beyond. There is also the potential to enhance existing connections between the urban area and wider countryside.





Available and Suitable

The following sections of the Advocacy Report will show that the Townend Lane site is available, suitable and achievable and represents a sustainable residential opportunity on the edge of an established regeneration area where there are limited alternative opportunities for growth. The site is controlled by Strata with an expert technical team to support the delivery of the proposed scheme.

Availability

Strata have a legal agreement with the landowners to promote and develop the land for housing.

Strata are a well-funded home builder with a strong demonstrable track record of delivery of high quality new homes in the north of England. They are committed to develop the site and have appointed a technical team to provide the resource, expertise and experience to build the proposed scheme.

The land is therefore “available” in accordance with the Framework and the Planning Practice Guidance (PPG).

Suitability

The proposed development can make efficient and effective use of the land. The site is not located in an area constrained by landscape or ecological habitats. There are no heritage assets in close proximity to the site. The site is well contained and presents a logical extension to Stocksbridge/Deepcar.

Stocksbridge is a longstanding focus for growth and regeneration in Sheffield, the Town has ambitions to diversify and grow its economy and deliver more housing. Successful Towns Fund investment package and funding bids to explore the reopening of the commuter line to Sheffield underline the Governments backing of Stocksbridge’s efforts to level up.

The land is currently made up of agricultural fields with hedgerows and semi mature trees along Common Lane. The settlement form in this area lends itself to the formation of a robust long term Green Belt Boundary to the south east of Stocksbridge/Deepcar. The scheme will include robust landscape buffers to enhance and strengthen this part of the Green Belt.

The site benefits from being located close to employment and food retail opportunities with public transport providing access to further retail and leisure facilities including Stocksbridge and Sheffield City Centre. There are also a number of services

such as schools and GP practices close to the site.

Sheffield City Council recognises the need for Green Belt Review to support the growth and regeneration ambitions for the area. The site provides an important opportunity to meet the housing needs of Sheffield, which provides the exceptional circumstances to justify the release of the site from the Green Belt.

The development will provide additional quality development that will benefit the settlement and wider district with economic, environmental and social benefits. The sustainability credentials of the location demonstrate that this is a suitable site for removal from Green Belt to deliver new homes. The site and proposals are therefore “suitable” in accordance with the Framework and PPG.





Constraints and Opportunities

The Townend Lane site provides a unique opportunity to deliver high quality new homes within a landscaped setting close to existing services, facilities, employment, public transport routes and the M1 Motorway. The site is accessible to Sheffield City Centre and the wider region.

The site benefits from access to a number of Public Rights of Way that lead to popular local, regional and national walking trails. Access to these will have to be maintained for the wider public.

The site is also within a short walk of local schools, high quality retail at Fox Valley and public transport facilities with the opportunity for a future rail connection to Sheffield. The topography of the site slopes downward from south to north. This offers views across the valley and visually screens the site from the landscape to the south.





Photo Survey

A photographic survey of the site was undertaken to establish the setting of the site.



The site has strong defensible boundaries and is well contained. There is a small car-park to the south of the site and small drainage channels in the north-west corner.



The tree-belt to the southern boundary separates the site from the countryside to the south and further connects the site with the urban area.



The slope of the site, dropping away to the north, allows views into the valley and therefore provides a visual connection with Stocksbridge/Deepcar.

The site enjoys views across the existing urban area and the valley beyond.



Flood Risk and Drainage

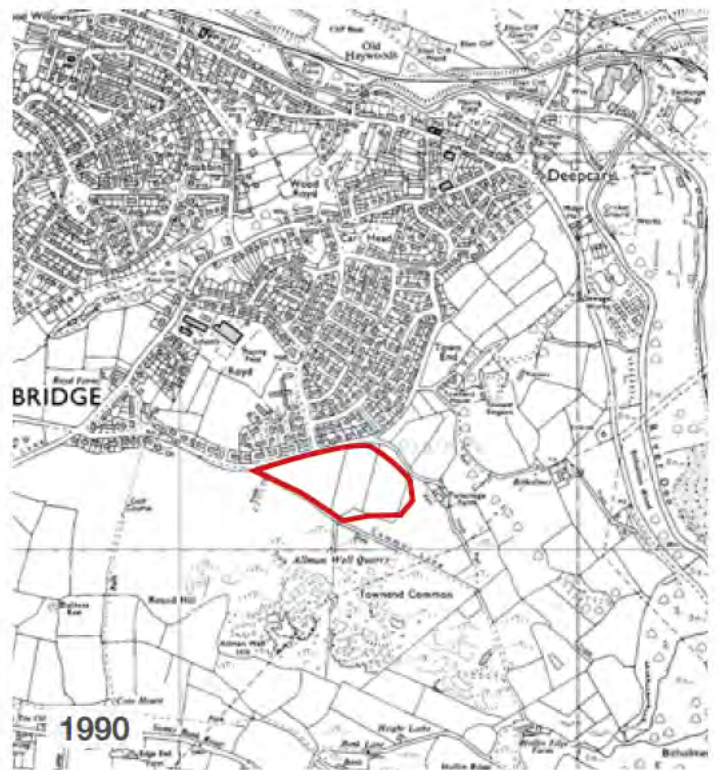
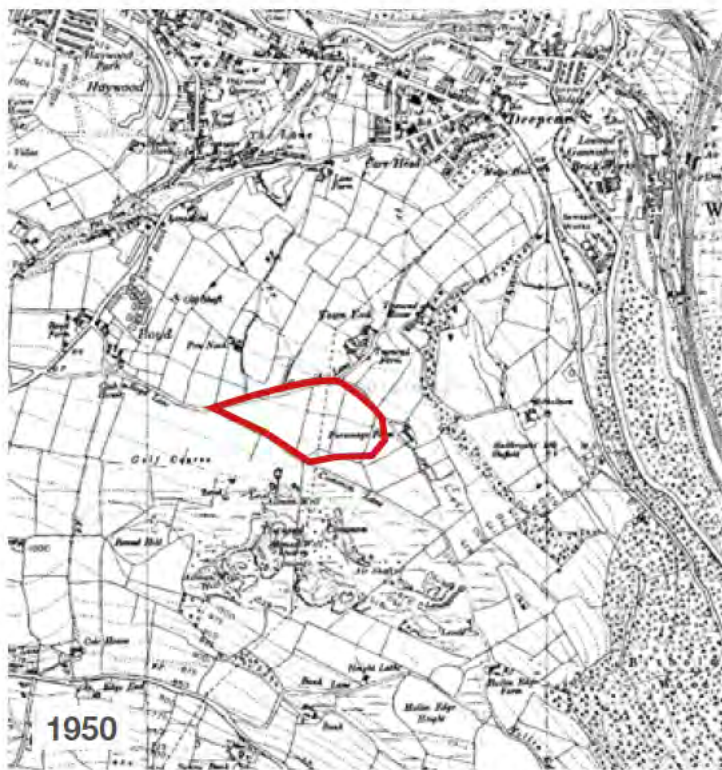
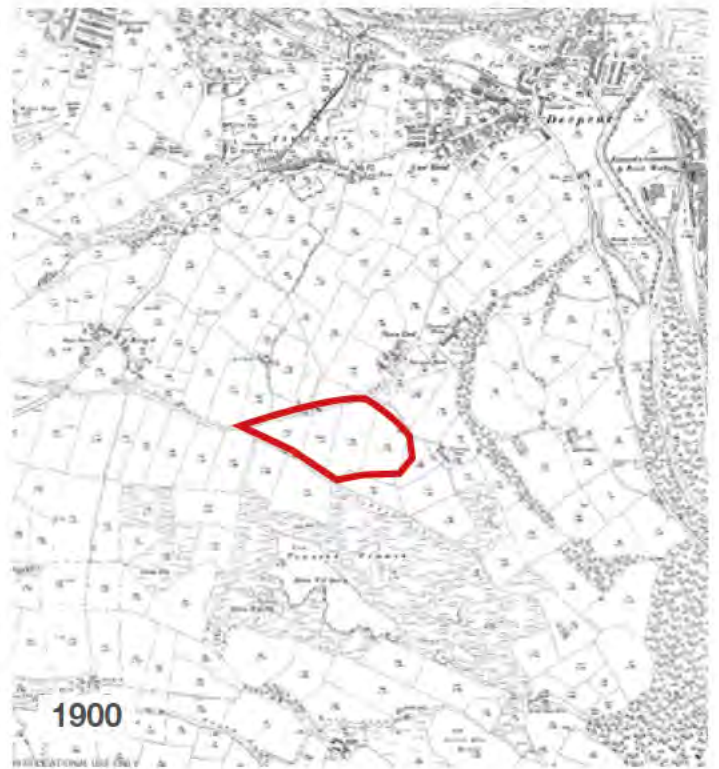
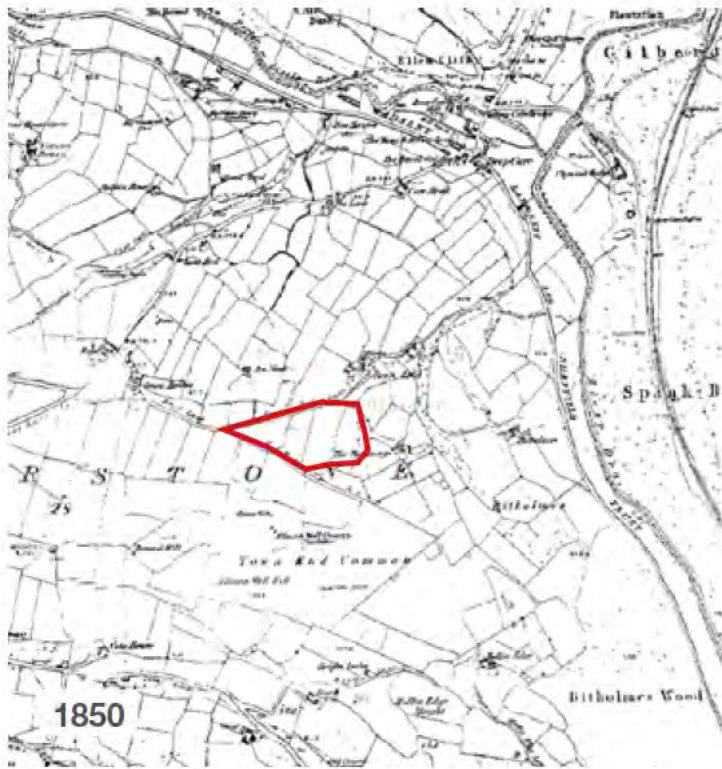
A flood risk and drainage assessment has been carried out by a suitably qualified consultant team on behalf of Strata. The site topography slopes from west to east and there is a golf course located against the southern boundary separated from the site by a tree belt. There is a low risk of flooding and drainage can be accommodated.

The site is within Flood Zone 1, with a low risk of flooding with a risk of 1:1,000 in any one year.

It would be preferable for the surface water to be disposed of via soakaway. Surface water discharge will need to be restricted to greenfield runoff rates.

Surface water drainage can be accommodated within the site and foul drainage can be accommodated within Townend Lane.

Therefore, from the initial assessments undertaken there are no flood risk and drainage constraints.



Geotechnical and Geo-environmental

A desk based ground investigation has been carried out by a suitably qualified consultant team on behalf of Strata. The review has established that there are no significant issues relating to ground conditions which would prevent the site from being developed to accommodate housing. The site has historically been used for agricultural purposes and therefore there is a very low risk of contamination or relic foundations on site.

The desk based assessment undertook a review of the historic uses of the site. The site area has likely been used for agricultural purposes, historical mapping has not revealed any commercial, industrial or residential use.

The surrounding area has been historically used for mining, off site uses which are of potential significance to this site and shown on the historical mapping includes Allman Quarry to the South of the site and several shafts noted 300m and 500m to the north west of the site. However, by 1999 the historical mapping shows that the Allman Quarry has been restored and turned into a Golf Course.

In terms of Geology, there are expected to be no superficial deposits, however weathered Pennine Lower Coal Measures are likely to be present as Stony Cohesive materials. The Bedrock is identified as the Pennine Lower Coal Measures Formation and is mapped as Sandstone at the bedrock interfaces across much of the site.

As is typical prior to development taking place an intrusive investigation will be required to confirm that the underlying ground is suitable for development. However, it is anticipated that the site will be deliverable. The intrusive investigation will be undertaken by suitably qualified

The recommended foundation solution is standard strip/trench foundations, which will not result in significant abnormal costs or preclude site development.

Therefore, there are no significant issues with regards to ground conditions which will prevent the site from being delivered for housing.



KEY

- The Site
- Potential Biodiversity enhancement corridor - appropriate native tree and shrub species
- Trees/tree groups to be retained (subject to arboricultural assessment)
- Potential biodiversity enhancement areas - grassland and wetland habitats
- Watercourse to be retained and enhanced



Ecology

Ecologists Smeeden Foreman have undertaken a preliminary ecological appraisal of the site and undertaken a site walkover. They found there are no ecological constraints which will either preclude or significantly constrain the development of this site. The site does not contain any statutory or non statutory designated sites.

Three statutory and twenty non-statutory designated sites have been identified within 2km of the proposals site. The closest sites lie to the south and east (Townend Common and Parsonage Wood Farm). Due to the nature and scale of the development it is anticipated that there would be no impacts on these sites. There is the potential for on-site planting to provide biodiversity enhancement by providing complimentary habitat and/or wildlife corridors links.

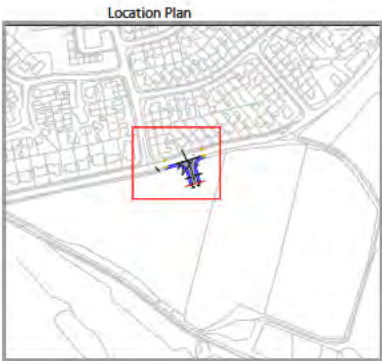
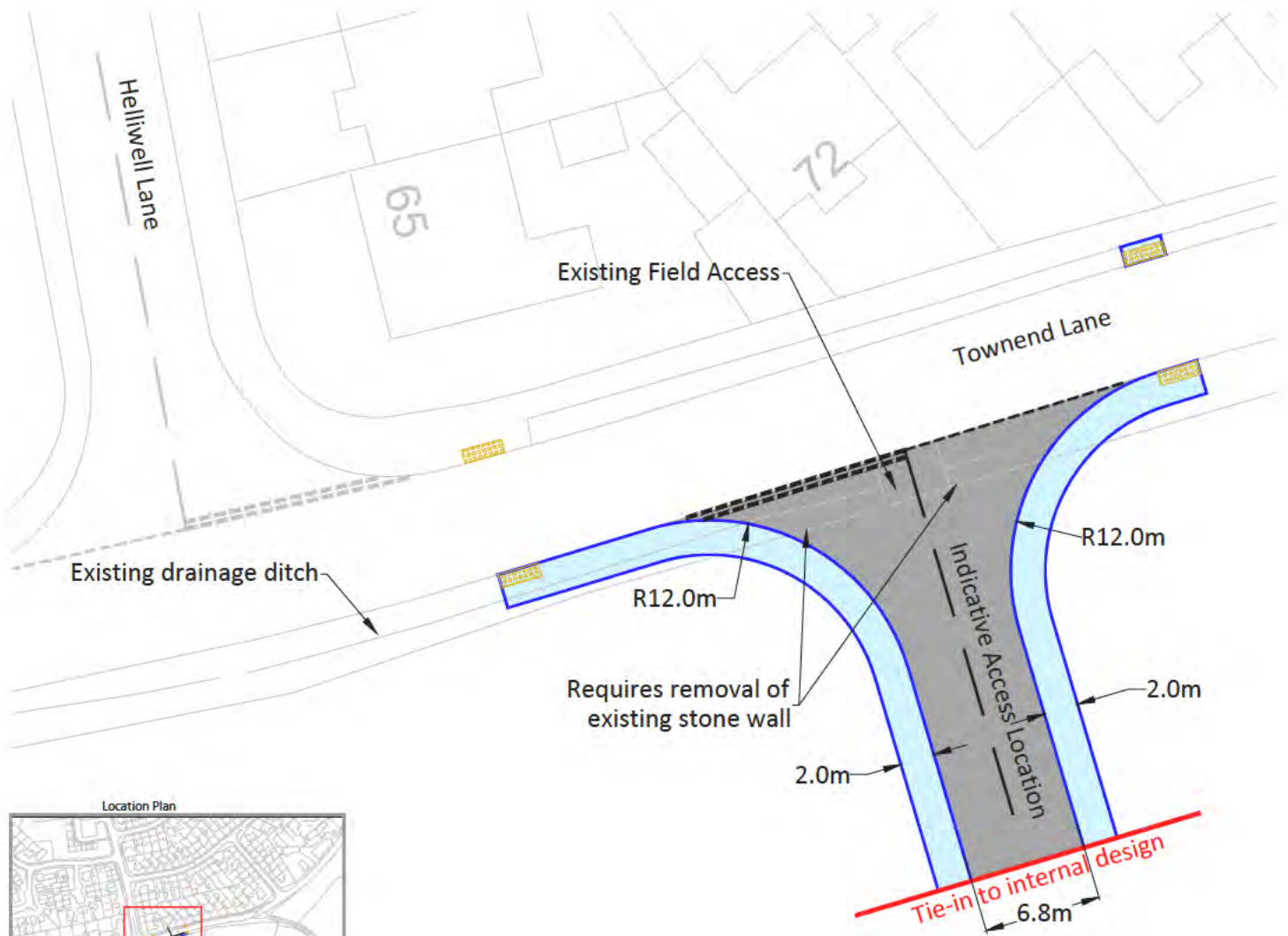
The site consists of three fields of agricultural grassland of low conservation value (species poor modified grassland), with wetter sections of potentially more interest to the southern edges. The fields are bounded by stone walls with few trees, principally to the site boundaries. A stream flows through the western section of the site with an open ditch along part of the northern boundary.

Trees will be retained where possible, subject to a detailed tree survey. The site presents the potential to create a habitat corridor of semi-natural vegetation along the southern boundary to include existing trees and areas of more diverse grassland

by inclusion of appropriate native tree/shrub planting. This would provide a link with the off-site tree belt within the adjacent golf course and east to Townend Common.

In terms of protected species there are no existing records of Great Crested Newts in the area and nearby water bodies are unlikely to support them. There are no suitable habitats on the site for badgers, reptiles or other protected species. In relation to bats there are a small number of trees, which will be surveyed at the appropriate time in relation to bat roost potential, but this is not considered to be a significant issue.

Therefore, from the initial assessments undertaken there are no ecological constraints to the proposed development



Highways and Access

Transport Engineers Local Transport Projects have been commissioned to produce a highways access appraisal. This appraisal demonstrates that highways access can be achieved from Townend Lane and serve approximately 140 units.

The highways access appraisal demonstrates that two potential access points can be achieved from the site and deliver required the necessary visibility splays.

The first access option is located to the western side of Helliwell Lane and the second option located to the east of Helliwell Lane.

For the purposes of this advocacy document it has been chosen to illustrate how the development could be achieved using the second access option, however either or both options would create suitable vehicular access.

Therefore, from the initial assessments undertaken there are no highways and access constraints to the proposed development.



KEY

- The Site
- Green Belt
- Building Frontages
- Corner Turner Homes
- LEAP
- SUDS pond
- Trim Trail
- Entrance to Development
- Biodiversity Enhancement Corridor
- PROW Connections



Design Principles

The scheme is designed as an outward facing development overlooking the surrounding landscape and leaving buffers to support biodiversity enhancement opportunities.

Stratas' initial proposal for the site seeks to create a new development which integrates into the surrounding neighbourhood and maintains the key features of the site.

The trees and hedgerows around the boundary of the site will be maintained, managed and reinforced. The north-eastern edge of the site will also become naturalised with the inclusion of a surface water drainage swale and a play area.

Connections will be made to the surrounding public rights of way (PROW) and footways to enable and encourage active travel from the site.

The development will create a number of urban blocks which will create active frontages overlooking the public realm and create a new place which allows and encourages connections.

A gateway will be created for those entering the development by vehicle with the homes either side of the entrance with corner turning units. A landmark building will also be located at the end of the view from the entrance.

Deliverability

Strata has commissioned a range of technical assessments demonstrating that the development of the site is “achievable”. The comprehensive array of available technical information for the site has informed an appraisal which demonstrates that the proposed scheme is viable, and hence deliverable.

Given the stage of the plan making process and proportionality of evidence at this stage standard industry assumptions have been utilised along with sensitivity testing around a number of varying scenarios. Nevertheless, this has demonstrated that the proposal will deliver a reasonable return for the landowners and an appropriate level of profit for the developers. The proposed scheme therefore fully accords with the Framework and can be considered deliverable.

The illustrative masterplan shows that the scheme can come forward in the short term and be delivered. The masterplan layers demonstrate the approach to delivering the scheme, including the drainage, utilities and green infrastructure and how it will reflect achieve the high design quality.

The proposed scheme can therefore be fully delivered within the Local Plan period.



Conclusion

The Townend Lane site presents a significant opportunity to create new high quality homes in a sustainable location to address Sheffield’s housing need and the growth of Stocksbridge. The site has the opportunity to create a sustainable living environment close to services, facilities and public transport routes.



This Advocacy Report has shown that the site at Townend Lane provides a unique opportunity to create a high quality housing development. The proposed scheme can create new homes in a sustainable location close to existing services, facilities and employment opportunities.

The delivery of the Townend Lane scheme will generate significant benefits for Stocksbridge and the wider region through the creation of direct and indirect job opportunities, alongside regional, environmental and community benefits, stimulating the local economy and adding value.

Strata has a legal agreement with the landowner and controls the site. The site is therefore “available” and can be delivered in the short term in accordance with the Framework.

The site lies in the Green Belt. This report demonstrates the exceptional circumstances supporting the release of the site from the Green Belt due to the urgent need to meet Sheffield’s housing need and ambitions for growth alongside regenerating Stocksbridge. The site is therefore “suitable” for a housing development in accordance with the Framework.

It has been shown that there are no major constraints to the development of the site and that the site can be delivered in the Local Plan period. The site is therefore “achievable” in accordance with the Framework.

The technical reports show how a mix of housing can be accommodated within the site, alongside connectivity, landscaping and drainage features. The development of the site, as shown within the indicative masterplan, is considered to be achievable.

It has therefore been shown that the site is available, suitable and achievable and therefore it is considered that the site is deliverable, in accordance with national planning policy and guidance. It is also attractive to the market, viable and is deliverable within the plan period.

Strata Homes

Stocksbridge Housing Market Assessment

November 2022



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01 Introduction

- 1.1 Strata Homes is promoting a housing site at Townend Lane, Stocksbridge. A key purpose is to address the imbalance in the housing stock in Stocksbridge, attract high skilled workers to work and live in the area and support economic growth, regeneration and urban renaissance of Stocksbridge.
- 1.2 To inform this, Spawforths have been instructed by Strata Homes to prepare a Housing Market Assessment for Stocksbridge. The Housing Market Assessment analyses housing market characteristics in Stocksbridge, including nature, mix and affordability. The report also considers whether further housing differentiation is required in Stocksbridge to deliver mixed and balanced communities and to capture new key worker employees to reduce community distances.
- 1.3 The report is structured as follows:
 - Chapter 2 reviews the Sheffield City Region Housing Market
 - Chapter 3 defines the Stocksbridge Housing Market Area
 - Chapter 4 analyses the Stocksbridge Housing Market
 - Chapter 5 provides a summary of the key points and conclusions

02 Sheffield City Region Housing Market

- 2.1 The Sheffield City Region Housing Review (March 2020) highlights that in general terms the housing market in South Yorkshire appears well balanced and there are many positive aspects compared to other areas in the UK. Rates of home ownership are relatively high – in line with the national average - with a lower proportion of private renting, and relatively higher levels of social housing. Median house prices are lower than both the UK and Yorkshire and although rising have done so at a lower rate since the financial crisis, while continuing to fall behind the national median. House prices, private rent and social rents are all relatively affordable compared to the national average. Even when accounting for local wages, that are 10% lower than the national average, income to house price/rent ratios are more affordable in South Yorkshire than most other city regions in the UK.
- 2.2 However, there are stark differences across the region. In terms of property prices, the higher values are found in the sub-urban fringes with more affordable housing concentrated in the urban centres of Sheffield, Rotherham, Barnsley and Doncaster. In this regard the subregion broadly conforms to a monocentric pattern of urban development where the highest income households live furthest from the urban centres.
- 2.3 The South Yorkshire housing market is therefore, like many other city regions, highly polarised and spatially segregated. The effect of this spatial arrangement is that housing markets are strongly correlated with the distribution and concentration of social and economic deprivation, including low incomes, low skills and educational attainment, and poor health. If the Sheffield City Region is to achieve its ambition to grow the economy in a way that achieves high productivity gains, and includes all communities in the benefits, then it will need to address the current skills deficit by improving the skills of those with few or no qualifications to advance their chances of employment and the city region's attractiveness to business investment. It is clear that a low skilled population is holding back productive growth, but it is also apparent that low skilled populations are in part an outcome of how housing markets function in South Yorkshire.
- 2.4 Housing markets define neighbourhoods and a sense of 'place' which serve to lock-in and exacerbate inequality through patterns of socio-spatial segregation. The effect of housing on school performance in Sheffield demonstrates how pupils from the more prosperous suburban neighbourhoods are most likely to go to the highest performing schools near to where they live. Given the patterns of inequality that exist across the City Region, the relationship between housing and schools becomes critical to addressing problems of social mobility. Retaining and attracting

new talent in the SCR is also vital to growth. However, there is evidence that the housing offer is not meeting the needs of graduates and young professionals.

- 2.5 City centre living has been driven by young high skilled people that choose to live and work in urban centres. The low level of new, quality city and town centre housing development is a current weakness which authorities are now seeking to address. The economic rationale for city-regions is based on the principle of agglomeration, that bringing businesses and people together enhances productivity and drives growth. But the Sheffield City Region does not yet function as a single travel to work area or exert the kind of centrifugal pull which can be found in other areas like Bristol, Manchester, Cambridge, Oxford and London.
- 2.6 Building socially and economically mixed communities is necessary if the challenges of economic inclusion and social mobility are to be achieved. This will require different homes of different size, type and tenure, to buy and rent. Over 50% of new houses are currently unaffordable for people on average incomes. While an average deposit on an entry level home (£15,000) would take households on bottom 20% incomes over 9 years to save. With growth and rising demand property will become more unaffordable. Home ownership is not achievable for everyone therefore the solution must be to build more affordable homes to rent. This could include options for shared ownership and ultimately the right to buy.
- 2.7 Furthermore, there are other pressures on the housing market. An increasing and ageing population will impact on the supply and demand for housing, with significant changes in the composition of households, which include:
 - A large increase in single people under 65s;
 - An increase in couples without children;
 - And a decrease in the number, and size, of families.
- 2.8 Current land allocations and housing targets in the sub-region are established through Local Plans. However, targets are a blunt instrument in assessing aggregate supply and demand. A more nuanced understanding is required to ensure the right type of housing is delivered in the right areas to meet the right need and maximise the potential for inclusive growth. The Housing Review also highlights that in addition to building new homes a major focus on phased housing renewal and estate regeneration, in the most disadvantaged areas, is required to improve the quality of existing housing stock.

03 Defining the Stocksbridge Housing Market Area

- 3.1 The starting point for the analysis within this paper is the consideration of Housing Market Area (HMA)s, specifically localised HMAs. Guidance with respect to the definition of Housing Market Areas has changed, however it is useful to consider wider definitions, and past guidance in order to inform the approach to defining a more localised/neighbourhood HMA.
- 3.2 Maclennan et al, in the Local Housing Systems Analysis Best Practice Guide, Edinburgh, Scottish Homes “...*the geographical area in which a substantial majority of the employed population both live and work and where those moving house without changing employment choose to stay.*”
- 3.3 The Geography of Housing Market Areas (CLG, November 2010) Considers the information that inform HMAs considered that “*a tiered approach to housing market areas is not only theoretically sound but also offers important policy advantages. A tiered approach to policy sees the framework housing market area as providing the long-term horizon for strategic planning encompassing projected household changes, transport connectivity, housing land availability, housing market change, urban capacity study and addressing major initiatives like growth areas. The local housing market area can be seen as the short-term perspective in which planning also has to operate. Building new houses within a framework housing market may not necessarily address supply shortage in a particular local housing market area directly in the short term but it is possible that new building in the long term can lead to a redrawing of migration patterns. To achieve this will require a sensitive approach to the location of such new housing taking into account transport networks for example demands a focus on local housing market areas embedded within their framework housing market area.*”. It indicates that framework housing market areas are defined by long distance commuting flows and the long term spatial framework with which housing 77.5% “commuting closure”, local housing markets defined by migration patterns “50% migration closure”, and Submarkets defined in terms of neighbourhood or house type price premiums.
- 3.4 Previous Planning Practice Guidance (2014) in relation to the assessment of housing and economic development needs indicated that house prices, migration patterns and commuting flows should all be considered when defining housing markets.

- 3.5 The Sheffield City Region Housing Review Part 1 “*housing markets are strongly correlated with the distribution and concentration of social and economic deprivation, including low incomes, low skills and educational attainment, and poor health*”.
- 3.6 This provides useful context with regards to the sources of information that it is appropriate to consider when defining HMA’s including lower tier market areas. This section will go on to consider the following:
- Migration
 - Travel to work Areas and Commuting
 - House prices
 - Indices of Multiple Deprivation,
 - Retail Catchment Areas,
 - School Catchment Areas.
 - Sheffield and Rotherham SHMA 2019.
- 3.7 Prior to the consideration of the above factors, it is useful to understand the physical locational characteristics and connectivity of Stockbridge/Deepcar.
- 3.8 Stocksbridge/Deepcar is situated within the administrative area of Sheffield City Council. However, it is geographically separated from the city centre and is a distinct settlement, identifies as a Principal Town within the emerging Local Plan. It is surrounded by Green Belt, and the Peak District National Park is to the south and west. It is located circa 10 miles north of Sheffield City Centre, 13 miles to the west of Rotherham, 9.4 miles to south west of Barnsley, 18 miles south of Huddersfield, and 21 miles south of Wakefield. Stocksbridge is well connected strategic highway network located circa 5.5 miles to Junction 36 of the M1 Motorway, via the A616¹.

¹ Distances are based on route choices, not as the crow flies, via google maps.

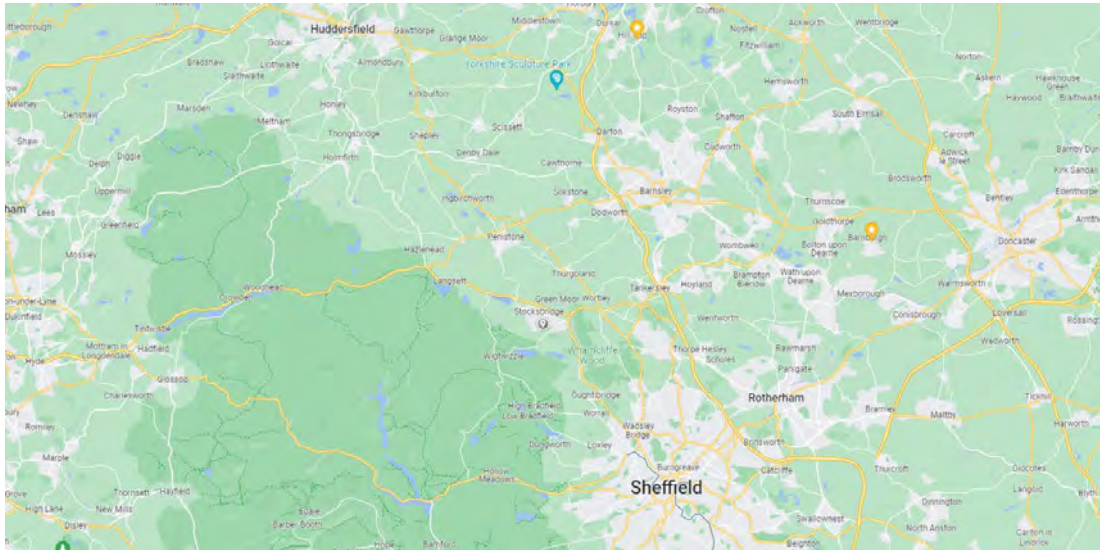


Figure 3.1 Stockbridge – Wider context.

- 3.9** Public Transport connections are available with a regular bus services operating every 30 minutes serving Stockbridge – Sheffield (Circa 50 mins), and between Stockbridge and Chapeltown, hourly (circa 30 mins). There is a train services located at Chapeltown with direct services to Sheffield, Leeds and Huddersfield. Cases for funding have been submitted to Government to reopen the Don Valley Line between Stocksbridge and Sheffield. This will significantly improve connectivity between Stocksbridge and Sheffield.

Migration

- 3.10** Origin and destination of migrants identifies flows of people into and out of Sheffield. This indicates a net outflow of people to Rotherham, North East Derbyshire, Barnsley, Leeds, Manchester, with net inflows of people from Cheshire East, Bassetlaw and Stockport. The most significant inflow was from people originating outside the UK. This data is not available beyond local authority level and therefore we cannot examine data down to Stocksbridge and Deepcar Wards level.

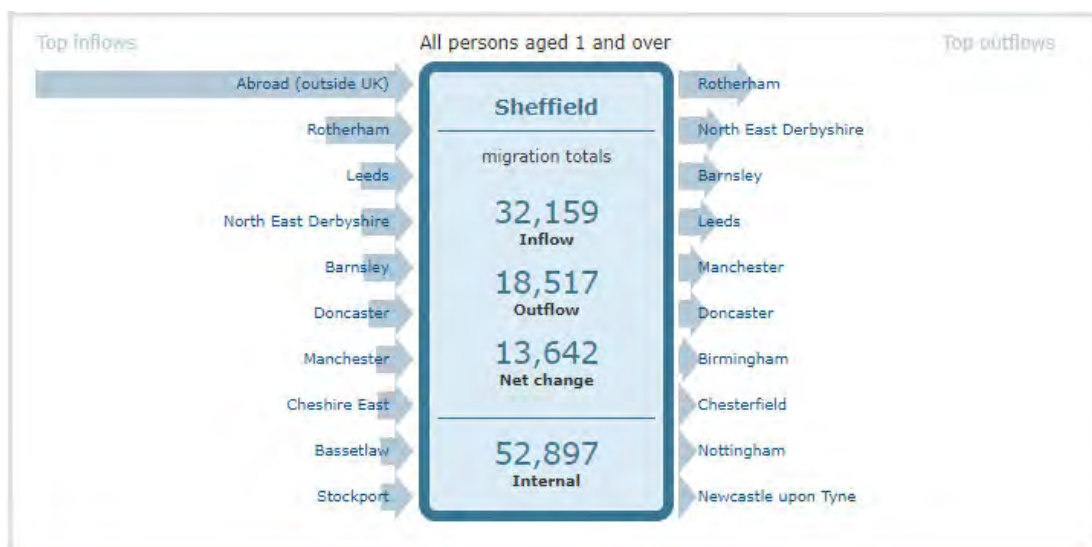


Figure 3.2 Migration Flows in Sheffield, Census 2011 Source: Nomis MM01CUK

3.11 Comparable data from the Census 2021 is not yet available however ONS – Internal Migration – Matrices of moves between English and Welsh Authorities details on moves within the UK during the year ending 2021. This notes an Inflow of 27,444 and an outflow of 29,199 a net outflow of 1,755 (this relates to moves within the UK only).

	Top Flows into Sheffield	Top Flows out of Sheffield	Net In Flow
Barnsley	762	1,233	-471
Birmingham	493	570	-77
Bradford	431	288	143
Chesterfield	341	451	-110
Doncaster	618	691	-73

	Top Flows into Sheffield	Top Flows out of Sheffield	Net In Flow
Kirklees	433	366	67
Leeds	914	1,208	-294
Manchester	638	797	-159
North East Derbyshire	725	1,220	-465
Nottingham	508	474	34
Rotherham	1706	2,390	-684

3.12 In 2020 there was a significant net outflow to Rotherham, Barnsley and North East Derbyshire.

Travel to Work Area

3.13 Travel to Work Areas (TTWA) provide an understanding of the functional relationships that exist between different geographies.

3.14 They are also helpful when considering the balance between employment and housing, for example an area where there is a net in commute (i.e. more people commuting into the district to work than out of the district) it can be argued that a lower increase in the economically active population within the local authority would be required to provide sufficient workforce for the forecast level of jobs. If there is a greater out commute, it may be that a higher increase in the economically active population would be necessary to ensure that there is sufficient workforce to support the forecast growth in jobs.

3.15 The figure below is a Census 2011 visualisation of the commuting flows in and out of Sheffield.

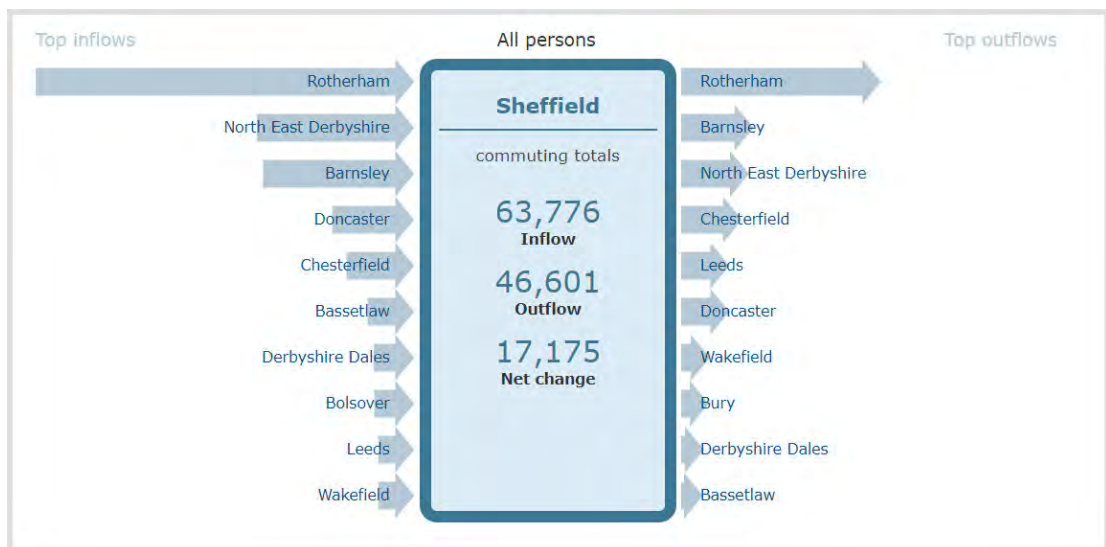


Figure 3.3 Commuting Flows in Sheffield, Census 2011 Source: Nomis WU01UK

- 3.16 This indicates that there are net inflows into Sheffield from Rotherham, North East Derbyshire, Barnsley, Doncaster, Derbyshire Dales, Bolsover and Bassetlaw. There is a net outflow to Leeds, Chesterfield, Wakefield and Bury. The largest flows of people are between Sheffield and Rotherham, East Derbyshire and Barnsley. Overall the table demonstrates that there is a net in-commute of 17,175 people. The location of the biggest flows of commuters, aligns with the largest migration outflows, Rotherham, North East Derbyshire, Barnsley and Leeds, where flows are also net outflows (i.e more people moving out of Sheffield to these destinations, than moving into Sheffield from these destinations). This may indicate some inadequacies in the current Sheffield Housing offer.
- 3.17 Figure 3.4 illustrates the Travel to Work Area (TTWA) produced by ONS derived from Census 2011 output. The TTWA boundaries were published in 2015 using 2011 Census commuting flow data. The TTWA boundary is reasonably well aligned with the District boundary.



Figure 3.4 Extract of ONS TTWA 2011, produced in 2015

3.18 Figure 3.5 identifies Stocksbridge within the context of the defined Travel to Work Areas.

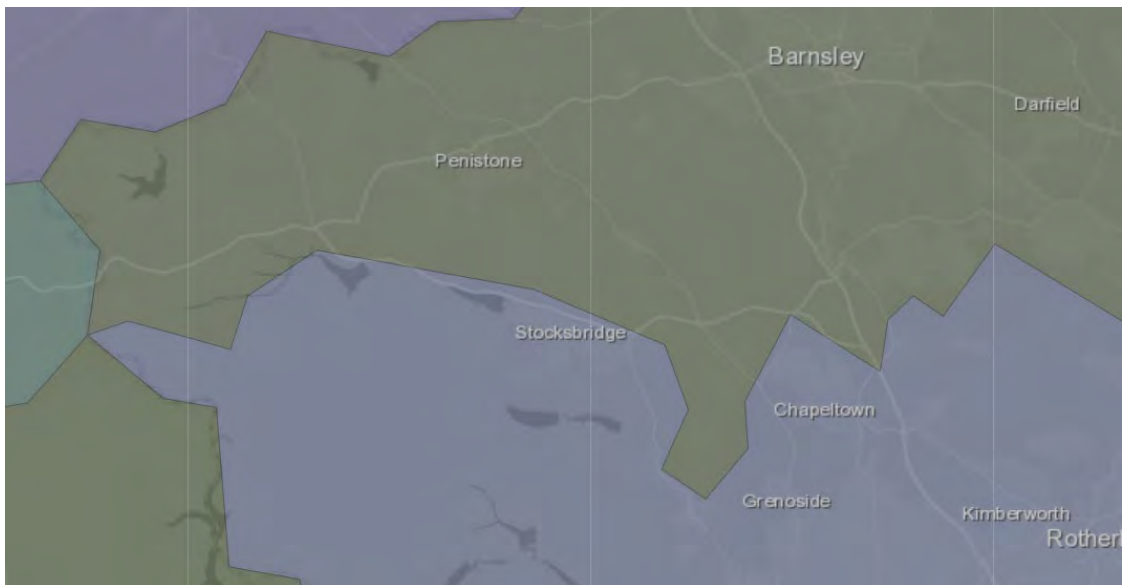


Figure 3.5 Extract of ONS TTWA 2011, produced in 2015

- 3.19 A series of alternative Travel to Work Areas have been developed for ONS. All broadly show Stockbridge sitting within a Sheffield TTWA of varying extents. When TTWA are based on Rail Users the TTWA varies in extent significantly, bringing in the wider Leeds City Region areas. <https://ons.maps.arcgis.com/apps/MapSeries/index.html?appid=397c7472e87cf0ca766386cc2>

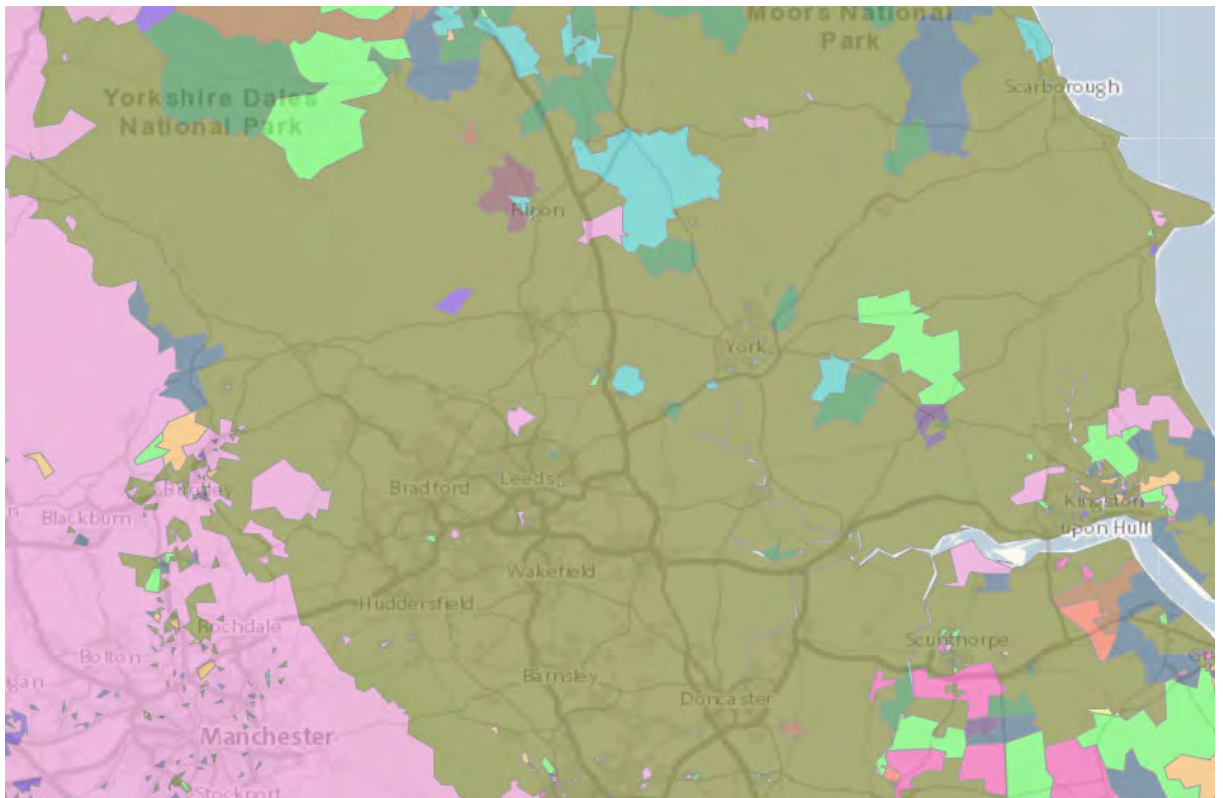


Figure 3.6 Extract of ONS TTWA 2011, produced in 2015

- 3.20 Census data² enables us to look at the relationships between smaller geographies, down to MSOA areas. We have reviewed this data for Stockbridge and Deepcar.

² Table WU02EW.

MSOA	Sheffield	Barnsley	Kirklees	Rotherham	Wakefield	Chesterfield
Stocksbridge (001)	73%	10%	1%	5%	1%	1%
Deepcar (002)	73%	8%	2%	6%	1%	0%

Table 1.1 Where residents over the age of 16 and in employment, Living in Stocksbridge or Deepcar, work. (Source Census³/Spawforths)

- 3.21 Table 1.1 reveals that despite Stocksbridge's location at the northern edge of the Sheffield City Council's administrative boundary over 70% of the residents in employment who live in Stocksbridge or Deepcar worked within Sheffield.

House Prices

- 3.22 Review of the average price paid data by postcode sector reveals a number of submarkets within Sheffield. The areas of Stocksbridge and Deepcar are relatively distinct from their neighbouring postcodes to the west and south which have some of the highest values in the wider Sheffield area due to their proximity to the Peak District National Park.

³ Table WU02EW

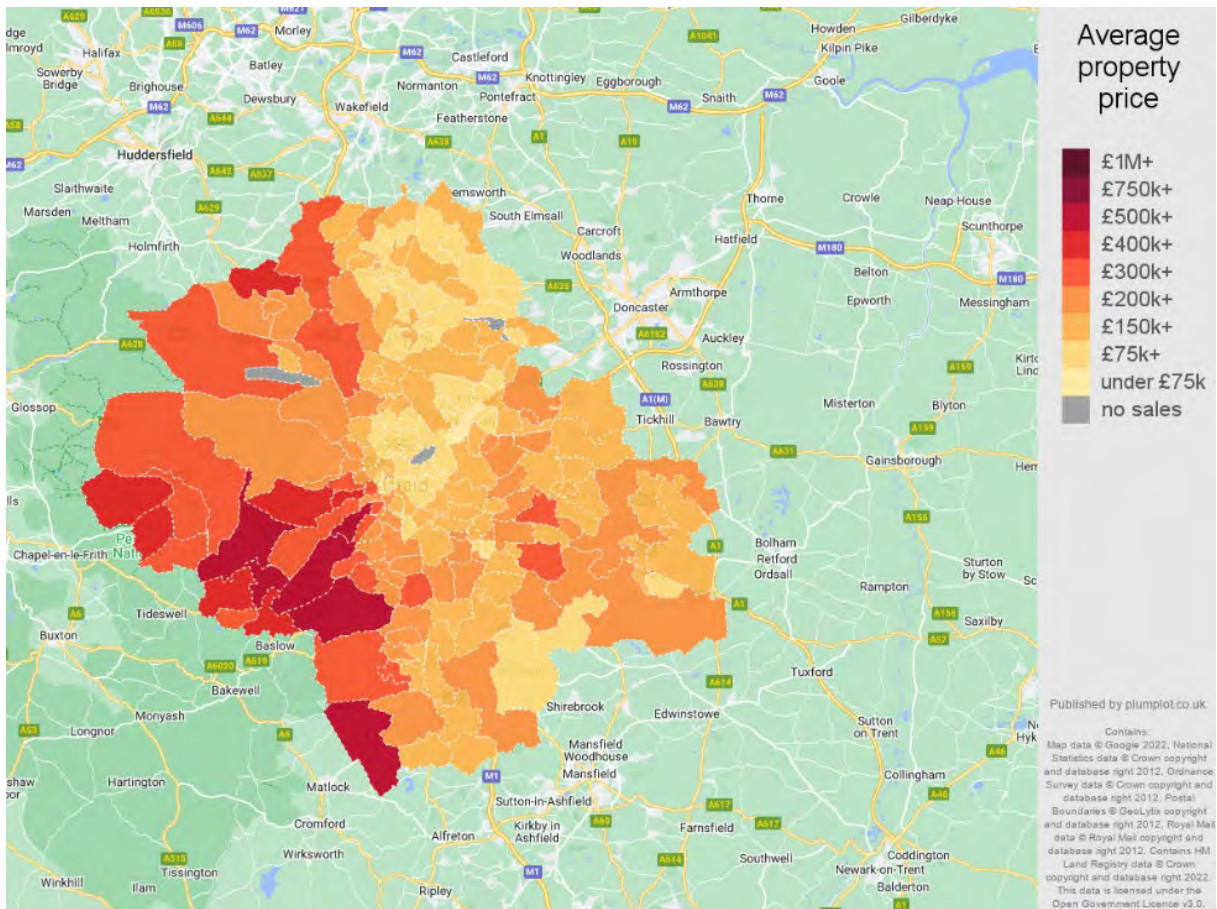


Figure 3.7 Average Property Prices January 2022 to December 2022 (postcode sectors): Sheffield Source: Plumplot

3.23 There is variation within and around Stocksbridge and Deepcar, which is demonstrated further by the image in Figure 3.7 Section will contain more detailed analysis of price paid data for Stocksbridge and Deepcar,

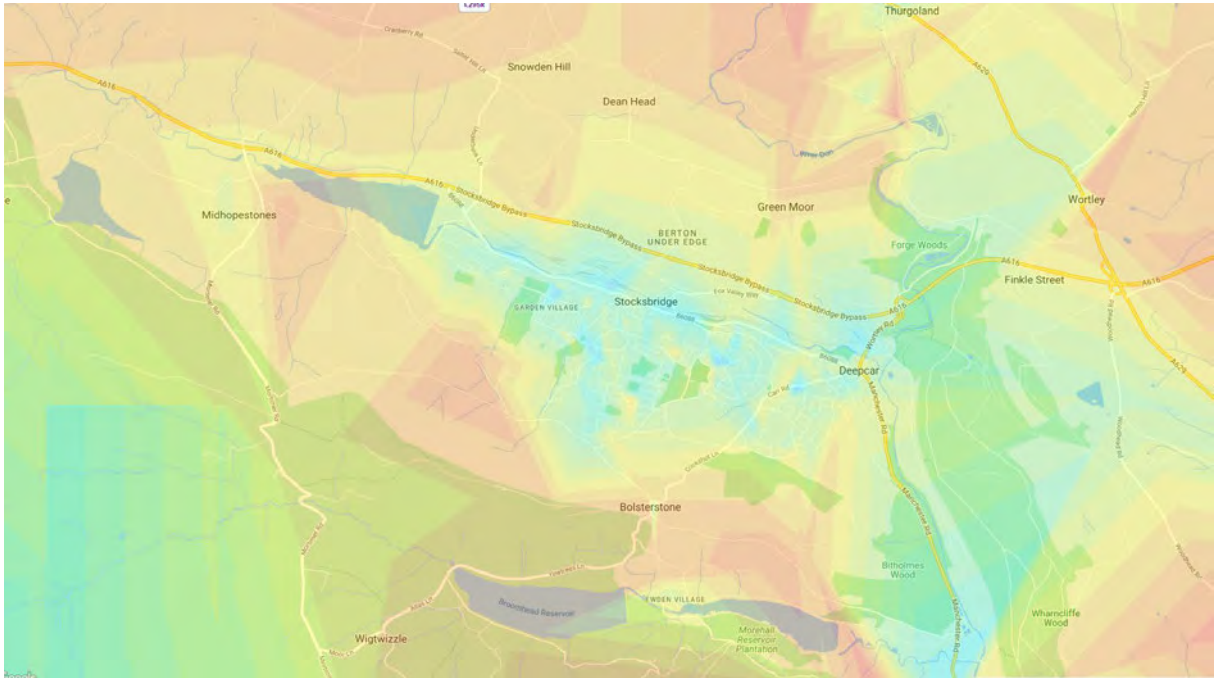


Figure 3.8 Houseprice Heatmap:Source Primlocation.

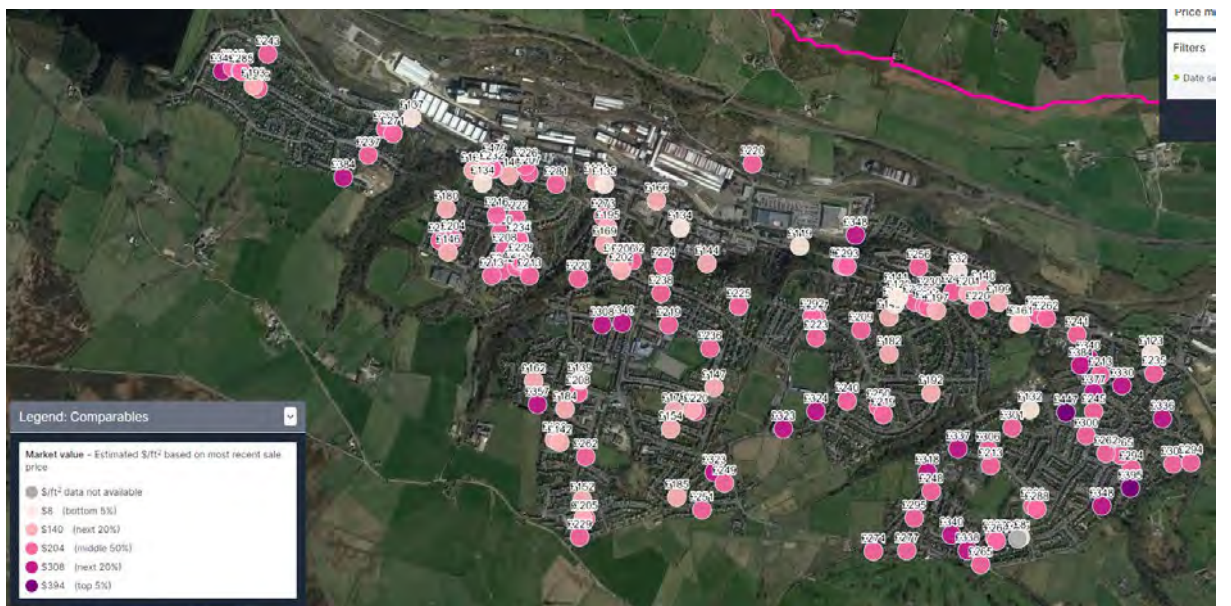


Figure 3.9 Sold Price per sq.ft. Source Landinsight

Indices of Multiple Deprivation

- 3.24 Having regard to the data on property prices, there is a clear relationship between the indices of deprivation and property prices. There is stark contrast within Sheffield with areas to the west ranking amongst some of the least deprived neighbourhoods in England, with areas to the east ranking amongst the most deprived neighbourhoods in England. There are distinct pockets of deprivation within the towns to the north of Sheffield's Main Urban Area. One of these is Stocksbridge.

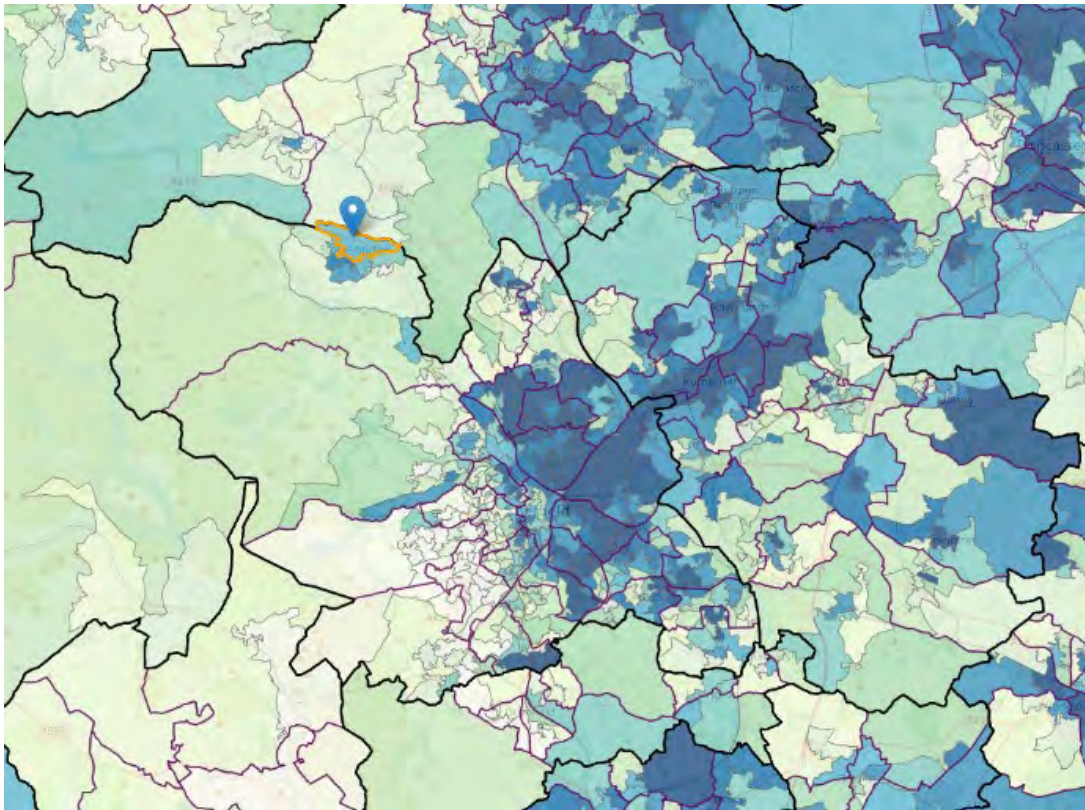


Figure 3.10 Indices of Multiple Deprivation Source DCLGapps.

- 3.25 Within Stocksbridge and Deepcar there are also variations within the levels of deprivation with areas of the town amongst the 20% most deprived neighbourhoods in England.

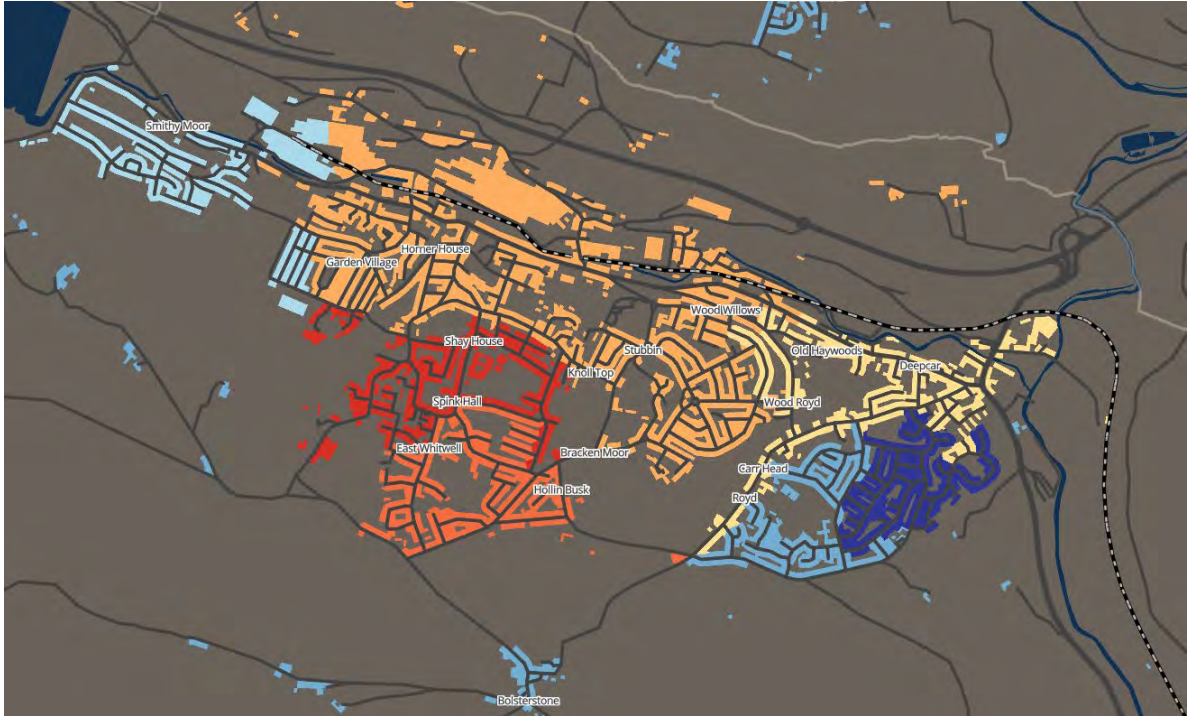


Figure 3.11 Indices of Multiple Deprivation: Stocksbridge and Deepcar Source DCLG and CDRC Mapmaker

Retail Catchment Areas

- 3.26 A Retail and Leisure Study, November 2022 has been undertaken to inform the emerging local plan in Sheffield. This defined a study area for the study, the study area was broken down into 15 zones. The fifteen zones are considered to be “*representative of geographic areas that may accommodate broadly similar patterns of shopping behaviour*”.
- 3.27 The Study areas are as follows:

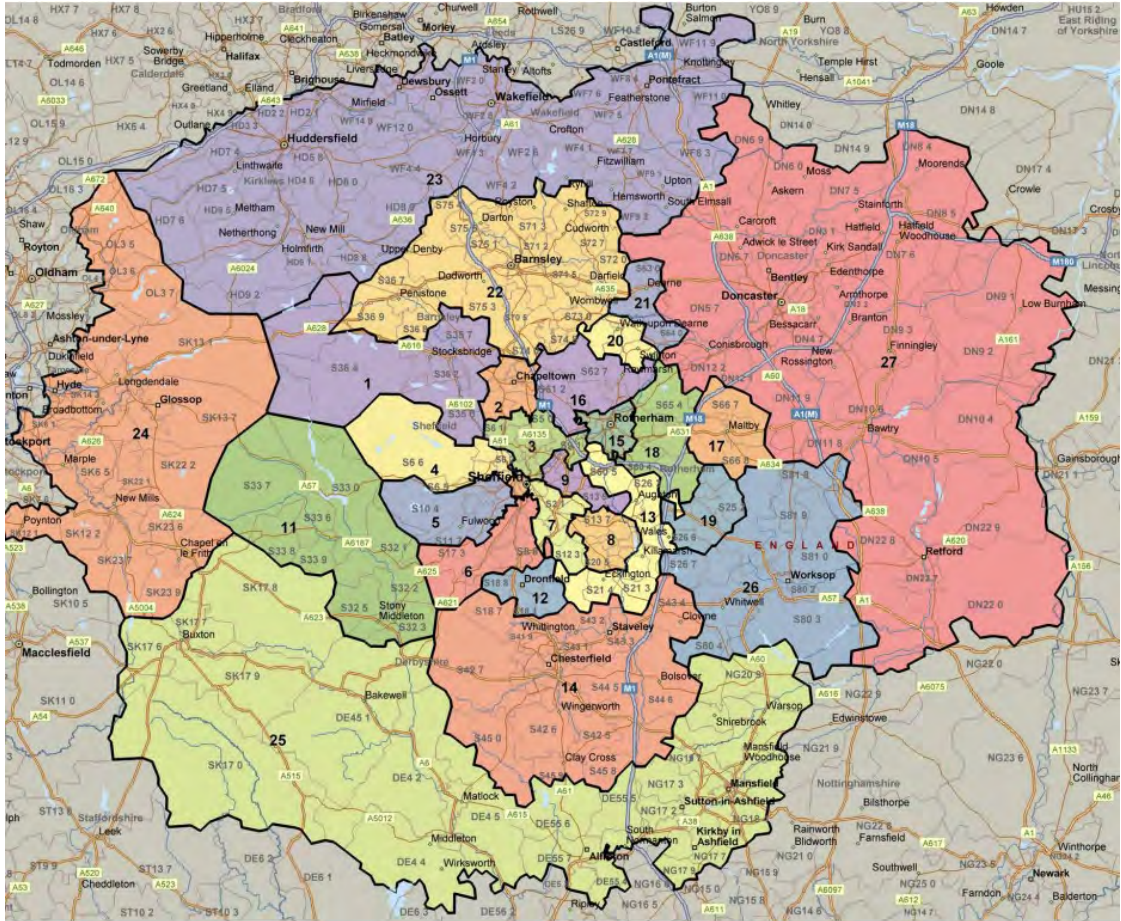


Figure 3.12 Retail Zones: Sheffield Retail and Leisure Study, November 2022

3.28 Stocksbridge and Deepcar are within Study Area 1. Zone 1 is noted to retain 85.2% of convenience good expenditure, and 73.1% of top up expenditure (Table 4. Convenience Good Expenditure). The retail study relies on Experians population projections which estimate population growth of 2,041 people over the period 2022 to 2039. This compares to population growth of 64,729 for the whole study area.

School Catchment Areas.

3.29 School catchment areas provide another useful indicator for localised housing market areas.

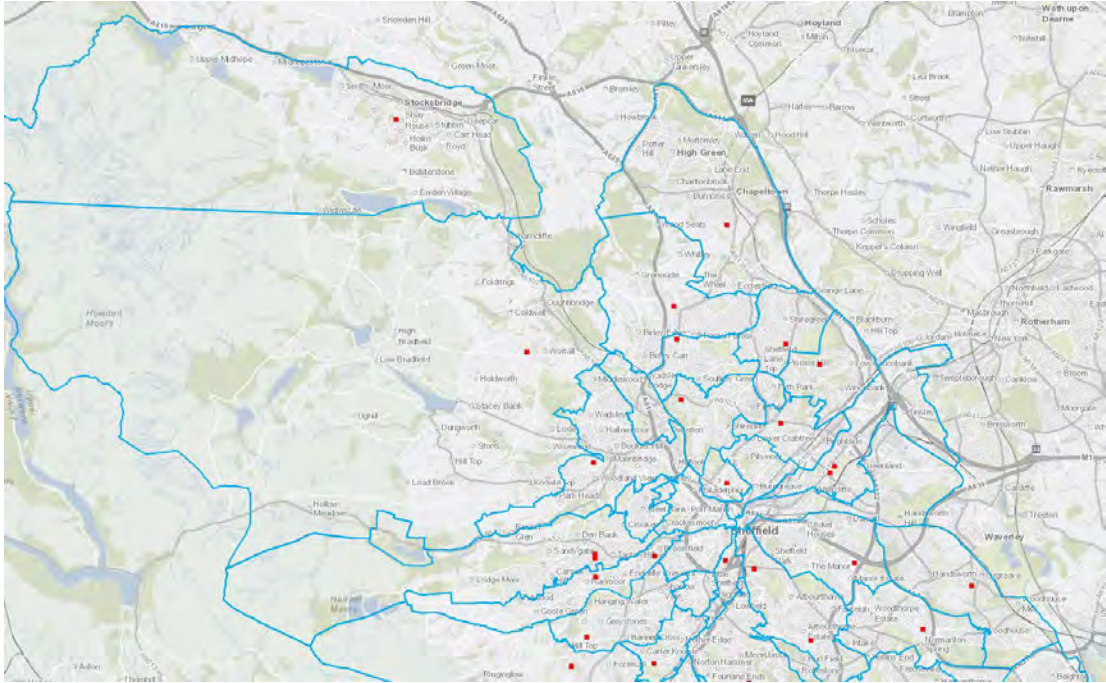


Figure 3.13 School Catchment Areas

3.30 Sheffield and Rotherham SHMA 2019.

3.31 The Sheffield and Rotherham Housing Market Assessment, recognises that there are distinct unique housing market areas/ character areas within Sheffield. It notes that the

“Self-containment and alignment of travel to work areas does not negate the great diversity of sub-markets within the SRHM. The HMAs proposed for this study are highly diverse, showing different socio-economic characteristics and housing market conditions”.

3.32 The Sheffield and Rotherham 2019 SHMA considered localised differences in housing stock. In doing so it considered that constructing sub-market areas to undertake more localised analysis of the housing market study was critical. The SHMA 2019 noted that there were specific areas that played a significant role in influencing housing demand. Notable areas included the Peak District National Park (PDNP). This can be seen in analysis above, the PDNP has some of the highest average house prices, with lowest areas of deprivation, with the physical, environmental and planning policy constraints impacting upon the supply of land. The SHMA stated that *“this helps to explain ongoing housing pressure in areas such as the south west of Sheffield (and west Barnsley) whilst also setting in context the relationship with neighbouring areas (e.g. rural Upper Don Valley, Stocksbridge and Deepcar, Rotherham Dearne and South West Rotherham), where substitutable properties for those unable to access the PDNP or south west Sheffield might be found”* [Spawforths emphasis).

3.33 In defining the local HMA's within the SHMA a range of data was reviewed, which included "insights from estate agents, developers, affordable housing providers, council officers, alongside analysis of resident's views, house price information, Rightmove search data and other planning data". Regard was given to LSOAs to assist in the analysis of data relative to the HMA's.

3.34 Stockbridge and Deepcar is identified as one of the local housing market areas. The Pen Portrait contained within the SHMA describes the 18.9 sq. km. housing market area as:

*"Separate self-contained settlement on rural fringe. Enjoys good access to trunk road network but commuting links with Sheffield are congested and public transport can be slow. Some recent new build development, with more expected."*⁴

3.35 The geographic extent of the Stocksbridge and Deepcar Housing Market Area is depicted in figure 3.14 below.

Figure 3.5: Housing Market Areas



Figure 3.14 Extract Sheffield Rotherham SHMA, Housing Market Areas

⁴ Page 32, Sheffield and Rotherham SHMA, July 2019,

- 3.36** It is fairly tightly defined and includes Sheffield 001 and Sheffield 002, the Peak District National Park Fringe HMA bounds the HMA to the West and South. Barnsley is located to the north.
- 3.37** Consistent with longstanding guidance, localised/neighbourhood market areas are less informed by commuting patterns and travel to work patterns but, price paid data, reviewing indices of multiple deprivation, and school catchments are linked. Having regard to these factors there is clear support for a localised market area for Stocksbridge and Deepcar, and our review of evidence on updated house prices supports the boundary as defined in the SHMA 2019.

04 Housing Market Area Analysis

Socio Economic Profile

4.1 This section provides an analysis of the socio-economic characteristics of the Stocksbridge and Deepcar HMA and comparator areas. The comparator areas have been identified on the basis of migration data, and those areas where Sheffield experiences greater outflow of people to.

Household Composition

4.2 This highlights for the Stockbridge and Deepcar a greater proportion of households are occupied by one person households over the age of 66 and single family households over the age of 66, than for Sheffield at a whole. Across Sheffield more generally there are fewer households over the age of 66 than for the Region. There are greater proportions of single family households in Stocksbridge and Deepcar than Sheffield and the region, and also a greater proportion of single family households with non-dependent children. There are however comparatively fewer lone parent families, one person households, and Single family households married/civil partnership with children within Stockbridge and Deepcar than within Sheffield and Yorkshire region. Given the age greater proportion of older households within the Stockbridge and Deepcar area, this may point to the need for increased stock to cater for downsizing or accessibility. There may also be a need to cater for additional family housing for couples with dependent children, noting that there is comparatively fewer households within the area in comparison to Sheffield.

Household composition	Sheffield 001	Sheffield 002	Sheffield	Barnsley	Kirklees	Rotherham	Yorkshire and Humber
One person households	30.9	29.6	32.7	30.8	31.0	30.0	31.5

Household composition	Sheffield 001	Sheffield 002	Sheffield	Barnsley	Kirklees	Rotherham	Yorkshire and Humber
One person households over 66 years	15.5	13.0	12.9	13.1	12.6	13.3	13.3
One person households other	15.4	16.6	19.8	17.7	18.4	16.7	18.2
Single household family	66.3	67.9	60.7	65.2	63.7	65.9	63.1
Single household all aged 66 years and over family	13.1	13.3	8.5	9.5	9.0	10.2	9.5
Single household Married/Civil partnership family –	28.8	32.8	27.8	28.9	31.1	29.9	29.5
Single household Married/Civil partnership no children family –	11.5	13.4	9.7	11.9	10.6	11.4	11.1
Single household Married/Civil partnership dependent children family –	11.7	12.8	13.3	11.2	15.0	12.4	13.1

Household composition	Sheffield 001	Sheffield 002	Sheffield	Barnsley	Kirklees	Rotherham	Yorkshire and Humber
Single household Married/Civil partnership – All children non dependent	5.6	6.6	4.9	5.8	5.5	6.1	5.2
Single household family cohabiting couple	13.9	12.9	12.6	14.5	11.7	13.6	12.5
Single household family cohabiting couple – no children	7.1	6.8	7.2	7.1	5.9	6.2	6.6
Single household family cohabiting couple – with dependent children	5.8	5.3	4.6	6.5	5.0	6.3	5.1
Single household family cohabiting couple all children non dependent	1.0	0.9	0.8	1.0	0.8	1.1	0.8
Single household parent family lone	10.1	8.7	11.1	11.7	11.4	11.8	11.0
Single household: parent family lone with dependent children	6.7	5.3	7.2	7.8	7.6	7.6	7.2

Household composition	Sheffield 001	Sheffield 002	Sheffield	Barnsley	Kirklees	Rotherham	Yorkshire and Humber
Single household parent children dependednt family lone all non	3.4	3.4	3.9	4.0	3.9	4.2	3.8
Single household single household family other family	0.4	0.2	0.7	0.5	0.6	0.5	0.6
Single family hosuold single household family other family composition	0.4	0.2	0.7	0.5	0.6	0.5	0.6
Other household types	2.8	2.5	6.7	4.0	5.3	4.1	5.4
Other household types with children	1.2	1.0	2.0	1.9	2.8	2.1	2.2
Other household types, other including all full time students and all aged over 66 years and over	1.6	1.5	4.7	2.1	2.5	2.0	3.2

Table 4.1 Household Composition, Census 2021

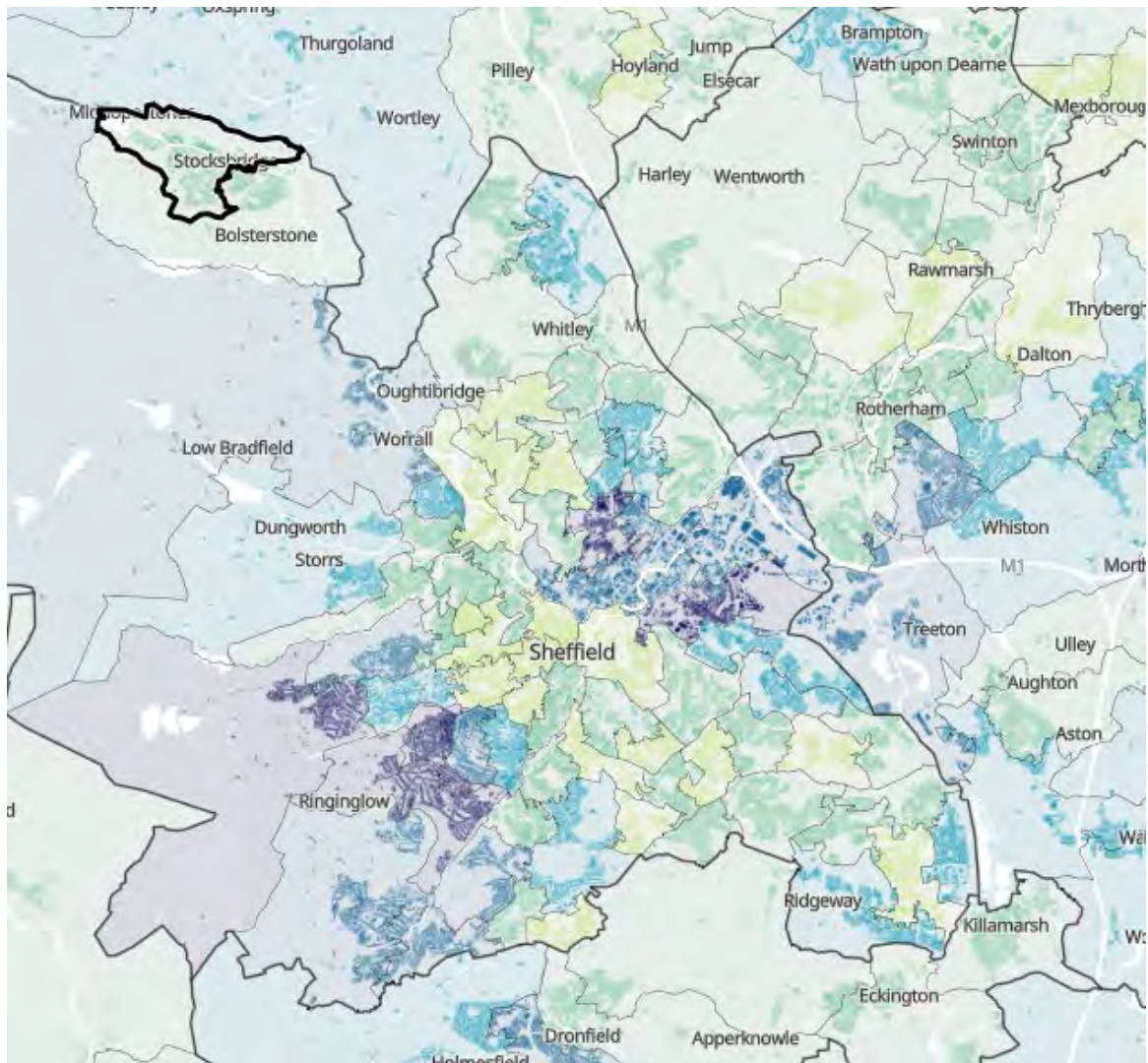


Figure 4.1 Family households with children, Census 2021

Age Profile

- 4.3 The following table considers the age profile of Stocksbridge and the Comparator Areas in line with the household composition it highlights that Stocksbridge and Deepcar have a comparatively older population than Sheffield as a whole. There is comparatively a smaller proportion of people under the age of 44 within Stocksbridge and Deepcar than Sheffield and the other comparator areas, with the exception of Rotherham and Barnsley for the age 15-19. This could be indicative of the availability and affordability of appropriate stock, and market attractiveness.

Age Profile (five year bands)	Sheffield 001	Sheffield 002	Sheffield	Barnsley	Kirklees	Rotherham	Yorkshire and Humber
Aged 4 years and under	5.1	4.2	5.4	5.5	5.8	5.5	5.4
Aged 5 to 9 years	4.9	4.9	5.8	5.9	6.4	6	5.9
Aged 10 to 14 years	5.7	5	5.8	5.9	6.6	6.2	6.1
Aged 15 to 19 years	5.1	5.3	6.7	5	6.2	5.4	5.9
Aged 20 to 24 years	4.4	4.8	9.1	5.1	6	5.3	6.3
Aged 25 to 29 years	5.9	5.1	7.3	6.6	6.1	6.2	6.4
Aged 30 to 34 years	6	5.8	7	6.9	6.6	6.8	6.7
Aged 35 to 39 years	5.8	5.3	6.3	6.4	6.5	6.4	6.4
Aged 40 to 44 years	5.3	5.8	5.8	5.7	6.3	5.7	5.9

Age Profile (five year bands)	Sheffield 001	Sheffield 002	Sheffield	Barnsley	Kirklees	Rotherham	Yorkshire and Humber
Aged 45 to 49 years	6.7	6.5	5.8	6.3	6.5	6.3	6.2
Aged 50 to 54 years	7.5	8.6	6.5	7.7	7.1	7.3	6.9
Aged 55 to 59 years	6.8	8.4	6.2	7.3	6.6	7	6.8
Aged 60 to 64 years	6.1	6.9	5.3	6.4	5.7	6.2	6
Aged 65 to 69 years	5.6	5.9	4.5	5.5	4.9	5.3	5.1
Aged 70 to 74 years	6.8	6.8	4.4	5.3	4.9	5.3	5.2
Aged 75 to 79 years	5.3	5.8	3.4	3.9	3.4	4	3.7
Aged 80 to 84 years	3.6	2.8	2.5	2.5	2.4	2.7	2.6

Age Profile (five year bands)	Sheffield 001	Sheffield 002	Sheffield	Barnsley	Kirklees	Rotherham	Yorkshire and Humber
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Aged 85 years and over	3.3	2.2	2.3	2.2	2.1	2.3	2.4
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Table 4.2 Age Profile Census 2021

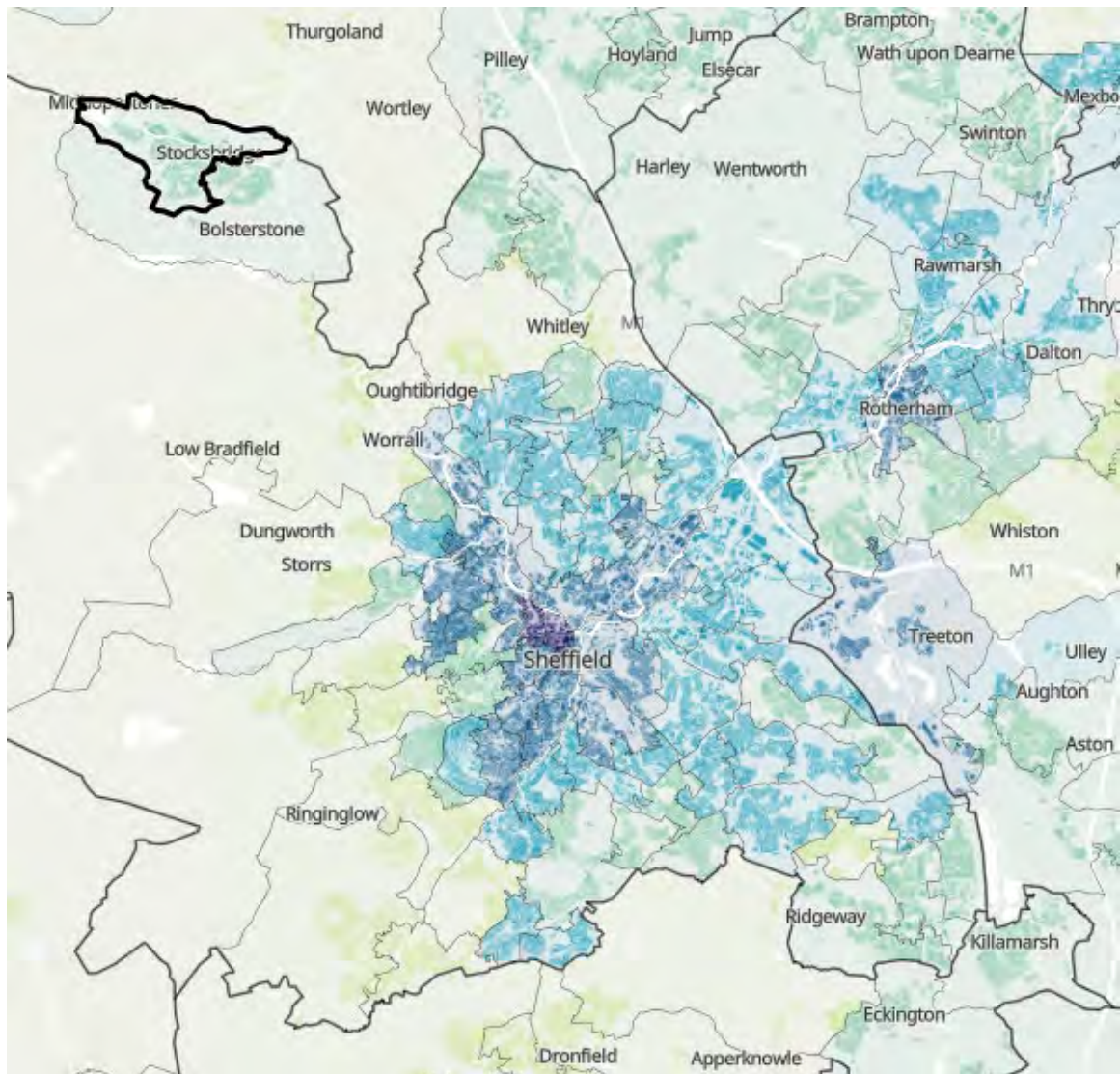


Figure 4.2 Proportion of people aged 25-34, Census, 2021

Qualifications

- 4.4 There are some variations in levels of qualifications achieved within Stocksbridge and Deepcar, with Stocksbridge (Sheffield 001) experiencing greater proportions of the population with no qualifications than Deepcar, and Sheffield as a whole, Whereas Deepcar has comparatively fewer people with no qualifications than Sheffield as a whole and the wider region. The comparator areas of Barnsley, Kirklees and Rotherham had comparatively higher percentages of people with no qualifications. Both Stocksbridge and Deepcar had a lower percentage of people with Level 4 or above qualifications than Sheffield as a whole.

Highest Level of Qualification	Sheffield 001	Sheffield 002	Sheffield	Barnsley	Kirklees	Rotherham	Yorkshire and Humber
No Qualification	20.1	16.2	19.4	25.2	20.7	23.4	20.6
Level 1 and entry level qualifications	11.2	9.3	9.1	10.8	9.8	11.4	10.1
Level 2 Qualifications	13.9	15.1	11.7	14.5	13.3	15.6	13.6
Apprenticeship	7.8	7.4	5.4	6.6	6.3	6.7	6.1
Level 3 Qualifications	19.1	19.4	18.6	16.8	17.4	17.1	17.4
Level 4 Qualifications or above	25.1	29.6	33.4	23.4	29.9	23.1	29.5
Other Qualifications	2.8	2.9	2.4	2.6	2.7	2.7	2.6

Table 4.3 Highest Qualifications, Census 2011

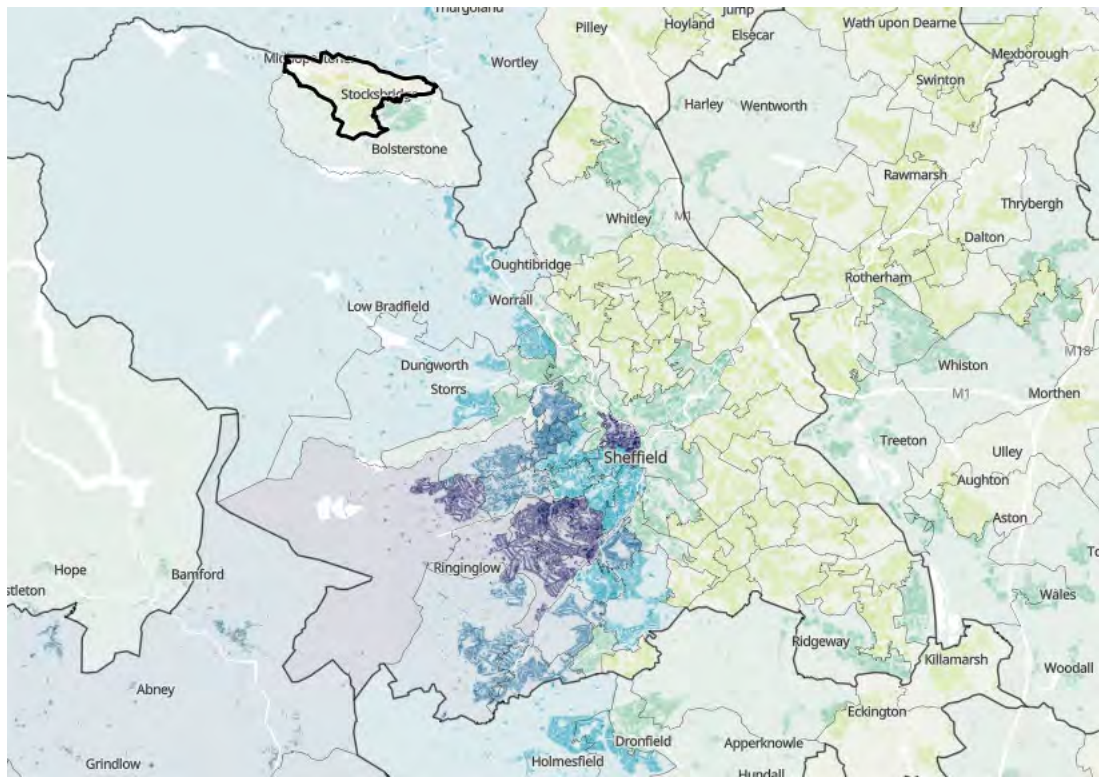


Figure 4.3 percentage of people with level 4 qualifications and above as their highest level of qualification, census , 2021

Average household Income (Gross)

4.5 The ONS provides a source of data on household income down to MSOA level. There is some clear alignment between income and qualifications. Again there is divergence between Stockbridge (001) and Deepcar (002) with the gross annual incomes of the former sitting below the average for all the Sheffield MSOAs, and for Deepcar gross average is significantly higher than the Sheffield average.

Area	Sheffield OO1	Sheffield 002	Sheffield	Barnsley	Kirklees	Rotherham
Income (£)	38,700	46,400	40,571	36,110	38,273	37,045

Table 4.4 Total Annual Income by MSOA, ONS

Internal Moves – Migration

- 4.6 The ONS detailed estimates dataset of internal migration by origin and destination local authorities, ending June 2020 provides breakdown of moves by age. This provides some useful information to supplement the migration data considered in the context of defining HMA's. Analysis of this data set reveals that the largest moves into Sheffield are from the following age groups:
- 4.7 Need to insert information/table

Housing Stock Profile

- 4.8 Following review of the Socio Economic Profile, we turn to the Housing Stock Profile, this has been informed by a review of a range of sources of data, including Census, 2021.
- 4.9 Within Stocksbridge and Deepcar **over 50% of the stock is made up of three bedroom homes**. This is above the average for Sheffield, and the rest of the comparator areas. There is a notably smaller proportion of 1 bedroom dwellings when compared to Sheffield as a whole, but there are proportionately more 1 bedroom dwellings within Stocksbridge and Deepcar than within the region as whole. There are proportionately less four bedroom dwellings than Sheffield as a whole and the other comparator areas, with the exception of Barnsley.

Area	1 Bedroom	2 Bedroom	3 Bedroom	4 or more Bedrooms
Sheffield 001	10.2	25.9	52.0	11.9
Sheffield 002	7.6	21.4	55.0	16.0
Sheffield	12.3	26.0	45.1	16.6
Barnsley	6.4	29.0	49.5	15.0
Kirklees	11.4	28.6	39.4	20.5

Area	1 Bedroom	2 Bedroom	3 Bedroom	4 or more Bedrooms
Rotherham	7.5	24.7	51.8	16.1
Yorkshire and Humber	9.7	27.4	43.1	19.7

Table 4.5 No of Bedrooms, Census 2021

Accommodation Type

- 4.10 Analysis of the Census 2021 data Stockbridge and Deepcar display different characteristics with Deepcar having a larger proportion of semi-detached dwellings than its neighbour, and a lower proportion of flats and terraced houses. In comparison to Sheffield both Stocksbridge and Deepcar have a greater proportion of detached houses than the wider Sheffield area. They both had less semi detached dwellings that Barnsley, Rotherham and North East Derbyshire, which the latest data reveals receive significant inflows from Sheffield. Stockbridge and Deepcar have a significantly lower proportion of Flats than Sheffield, which has a greater proportion of flats than the rest of the comparator areas.

Area	Detached	Semi Detached	Terraced	Purpose Built Flats	Shared House	Converted Building	In Commercial / Industrial Building	a Caravan or Other
Sheffield 001	21.7	39.2	28.3	9.7	0.5	0.4	0.2	0
Sheffield 002	39.9	35.3	17.8	6.2	0.3	0.2	0.4	0
Sheffield	15	28	36	17.6	1.7	0.9	0.9	0
Barnsley	23.4	45.5	23.3	6.2	0.7	0.3	0.5	0.1

Area	Detached	Semi Detached	Terraced	Purpose Built Flats	Shared House	Converted Building	In Commercial Building	Caravan / Other
Kirklees	21.6	34.2	31.5	9.6	1.2	1.2	0.6	0.1
Rotherham	22.3	49.2	18.2	8.7	0.6	0.3	0.6	0.0
North East Derbyshire	36.7	43.4	12.8	5.2	0.6	0.3	0.6	0.4
Yorkshire and Humber	21.6	37.6	26.1	11.1	1.7	0.9	0.7	0.2

Table 4.6 Accommodation Type, Census 2021

Heating

- 4.11 There are no substantial differences between the Comparator Areas in relation to nature of heating. Sheffield has a notably larger percentage of housing stock that is electric only, this is likely to coincide with the larger proportion of flatted accommodation within the Sheffield housing stock.

Area	Sheffield OO1	Sheffield OO2	Sheffield	Barnsley	Kirklees	Rotherham	NE Derbyshire	Yorkshire and Humber
No Central Heating	1.0	1.2	1.4	0.7	2.0	0.8	0.6	1.5
Mains Gas Only	85.7	84.1	79.2	82.1	80.8	82.8	83.2	77.5

Area	Sheffield OO1	Sheffield OO2	Sheffield	Barnsley	Kirklees	Rotherham	NE Derbyshire	Yorkshire and Humber
Tank or Bottled Gas only	0.1	0.9	0.4	0.6	0.5	0.5	1.0	0.8
Electric only	2.2	2.5	7.3	3.4	5.2	3.3	2.3	6.5
Oil only	0.5	1.0	0.2	0.7	0.4	0.5	1.6	2.2
Wood only	0.1	0.2	0.0	0.1	0.1	0.1	0.2	0.1
Solid fuel only	0.1	0.4	0.1	0.9	0.1	0.5	1.1	0.3
Renewable energy only	0.2	0.4	0.2	0.4	0.2	0.2	0.3	0.4
District or communal heat networks only	0.5	0.2	2.1	0.9	0.5	1.1	0.2	0.6
Other central heating only	0.6	0.6	1.1	0.9	1.0	1.0	0.5	0.9

Area	Sheffield OO1	Sheffield 002	Sheffield	Barnsley	Kirklees	Rotherham	NE Derbyshire	Yorkshire and Humber
Two or more types of central heating (not including renewable energy)	8.2	8.1	7.7	8.9	8.7	8.7	8.5	8.6
Two or more types of central heating (including renewable energy)	0.6	0.4	0.4	0.5	0.4	0.5	0.5	0.5

Table 4.7 Heating, Census 2021

Tenure

- 4.12 In relation to tenure, Stocksbridge and Deepcar have a greater proportion of stock that is owned, with Deepcar having comparatively higher levels of stock that is owned outright. There is a lower level of social rented properties within Stocksbridge and Deepcar, and particularly Deepcar. The two areas also have lower levels of private rent, than all comparator areas with the exception of North East Derbyshire.

Area	Sheffield OO1	Sheffield 002	Sheffield	Barnsley	Kirklees	Rotherham	NE Derbyshire	Yorkshire and Humber
Owned	71.3	79.3	58.3	62.3	65.5	63.6	70.5	62.6

Area	Sheffiel d OO1	Sheffiel d 002	Sheffiel d	Barnsle y	Kirklee s	Rotherha m	NE Derbyshir e	Yorkshir e and Humber
Owned: Owns outright	39.3	44.2	31.0	33.0	35.0	33.6	41.2	33.7
Owned: Owns with a mortgage or loan	32.0	35.2	27.3	29.4	30.5	30.0	29.3	28.9
Shared ownership	0.3	0.1	0.3	0.5	0.4	0.4	0.6	0.5
Shared ownership: Shared ownership	0.3	0.1	0.3	0.5	0.4	0.4	0.6	0.5
Social rented	15.5	9.7	22.6	19.7	14.8	20.7	18.7	17.3
Social rented: Rents from council or Local Authority	12.7	9.4	15.6	15.5	11.1	16.7	15.3	11.1
Social rented: Other social rented	2.7	0.4	7.0	4.2	3.7	4.0	3.4	6.2
Private rented	12.9	10.8	18.7	17.2	19.1	15.0	10.0	19.4
Private rented: Private landlord or letting agency	10.9	9.2	16.8	15.1	16.8	12.9	8.4	17.2

Area	Sheffield 001	Sheffield 002	Sheffield	Barnsley	Kirklees	Rotherham	NE Derbyshire	Yorkshire and Humber
Private rented: Other private rented	2.0	1.6	1.9	2.1	2.3	2.1	1.7	2.3
Lives rent free	0.1	0.0	0.1	0.3	0.3	0.3	0.2	0.2
Owns with a mortgage/load/share d ownership	32.3	35.3	27.6	29.9	30.9	30.4	29.9	29.4
Private rented or lives rent free	13.0	10.8	18.8	17.5	19.3	15.3	10.2	19.6

Table 4.8 Tenure, Census 2021

Occupancy Rating for Rooms

- 4.13 Northeast Derbyshire, Rotherham and Deepcar have the highest occupancy ratings, again there are differences between Stocksbridge and Deepcar, although both have a greater proportion of stock with the 2+more than the wider Sheffield Area.

Area	2+or More	1+	0	-1	-2
Sheffield 001	47.9	28.5	20.6	2.6	0.3
Sheffield 002	53.6	27.4	16.0	2.8	0.2

Area	2+or More	1+	0	-1	-2
Sheffield	42.9	27.6	23.3	5.2	1.0
Barnsley	44.0	34.4	18.2	3.0	0.5
Kirklees	41.1	28.4	23.6	5.4	1.5
Rotherham	49.3	29.9	17.4	2.9	0.6
North East Derbyshire	50.0	32.4	15.4	2.0	0.2
Yorkshire and Humber	46.2	29.2	19.8	4.0	0.8

Table 4.9 Occupancy rating for rooms, Census 2021

Age of Stock

- 4.14 CRDC have analysed the ages of housing stock based on EPC certificates. For Stocksbridge and Deepcar this highlights that the majority of stock was constructed prior to 1990 and mostly in the 1950s and 1960s, with limited new development. This is illustrated on Figure 4.4 below.



Figure 4.4 Build Year, Source CRDC/EPC

Housing Market

Price Paid Data – By Type

- 4.15 Land registry data was accessed in January 2023, providing details of sales for the year to date, by type of property. For the Area of Stockbridge, data was assessed by postcode sector, the boundaries vary slightly from the MSOA boundaries. The average price per detached dwellings is lowest in Stocksbridge, Barnsley, and Deepcar, prices are significantly lower than the Sheffield Average. Houseprices are highest in Sheffield for all housetypes, than the comparator areas. Semi detached and Terraced dwellings were on average more expensive in Stockbridge and Deepcar, than Barnsley and Rotherham.

	Detached	Semi-detached	Terraced	Flat/Maisonettes
S36 1	£283,558	£178,822	£139,002	£103,625
S36 2	£308,522	£191,656	£162,375	£148,500
Sheffield	£442,903	£240,243	£195,484	£153,860
Barnsley	£297,829	£161,896	£123,771	£104,635
Rotherham	£313,765	£172,701	£126,450	£101,487
Kirklees	£373,846	£204,820	£154,558	£117,859
North Derbyshire East	£383,674	£210,339	£162,130	£134,716

Table 4.10 Price paid data by type, Land Registry, January 2023 (year to date)

Sales Volumes by Type

- 4.16 Land registry data was accessed in January 2023, providing details of sales for the year to date, by type of property. For the Area of Stockbridge, data was assessed by postcode sector, the boundaries vary slightly from the MSOA boundaries. In all areas other than Deepcar, Semi-detached dwellings represented the highest sales volumes. This reflects that Semi-detached dwellings are the most dominant house types. In Deepcar sales volumes were highest for detached dwellings.

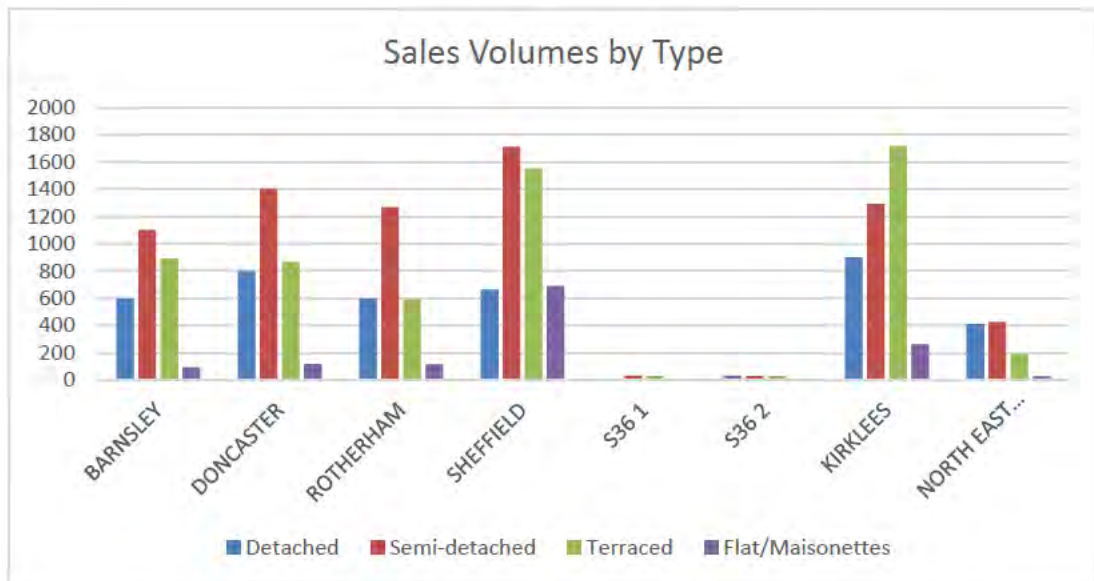


Figure 4.5 Sales numbers, by type, and area, Land Registry Price Paid Data.

- 4.17 Rightmove currently indicates that there are 58 dwellings available within Stocksbridge and Deepcar, of these 22 are detached dwellings, 11 are semi-detached, 8 are flats, and 9 are bungalows. The majority of properties currently being marketed are three bed properties, two properties were 1 bed, seventeen were 2 bed, 26 were 3 bed, nine were 4 bed, and three were 5 bed properties. Reviewing the properties by type that are currently being marketed, against the sales. It is possible turnover can be considered. This indicates that the properties in greatest demand are semi-detached and terraced, across both areas, and detached dwellings within Deepcar. In both cases flats have the lowest turnover or absorption.
- 4.18 Spawforths sought to engage local agents in the analysis of the HMA. The agent's responses reconfirmed the data analysis, which has shown that Deepcar and Stockbridge are predominantly a second hand house market. The agents indicated that the terraced houses are attracting a range of prices between £100,000 to £150,000, and three/four bed detached and bungalows range from £175 to £400,000.
- 4.19 Agents indicated that the area is an overspill from Oughtbridge/Sheffield due to access to Sheffield and the M1 Motorway. This echoes some of the analysis within the 2019 SHMA, and reflects the location of the Peak District National Park, and house prices to the west of Sheffield. Agents considered it to be a good residential location. The perception is that Deepcar is nicer than Stocksbridge.

Importantly, the agents anticipated demand to be high due to the lack of new build properties in the locality and following the recent investment at Fox Valley, the good range of facilities, including good school, doctors, dentists and leisure centre and the prospect of improved transport connections.

05 Conclusion

Future Growth and Implications for Housing Stock

5.1 The purpose of this report was to:

- Analyse the housing market in Stocksbridge and Deepcar, including the nature, mix and affordability; and
- To consider whether housing differentiation is required in Stocksbridge and Deepcar to deliver mixed and balanced communities and to attract high skilled workers to assist the regeneration and urban renaissance of the area.

5.2 The report has found that the Stocksbridge and Deepcar area have a distinct character and are in themselves distinct from each other. The area has an older age profile than the rest of Sheffield, conversely a larger proportion of the housing stock is detached and semi-detached, which are in demand. The analysis indicates that there are shortcomings in the housing market limiting its ability to attract younger professional's, younger couples, and young families, and that there is continuing demand for semi-detached, terraced housing and detached dwellings with respect to Deepcar.

5.3 Stocksbridge and Deepcar have a disproportionately large number of 3 bed properties and the majority of the properties are from the 1950s and 1960s and pre-date 1990. Therefore, the majority of the housing stock does not meet modern aspirational requirements for a new home. Those seeking larger and more aspirational housing are likely to leave the area. Therefore, the ability to attract and retain high skilled workers in the area is limited.

5.4 The age profiles and the size and occupation rates of stock points to a need to address the ability to meet the needs of older people, through specialist accommodation, accessible homes, and supporting downsizing. The tenure split indicates there are relatively few options for social rent and private rent.

5.5 This analysis is supported by the Stocksbridge Town Investment Plan which highlights the impact of limited new housing in Stocksbridge over recent years, noting this has had the effect of limiting population growth, and resulting in an aging population, and the benefits of population growth in supporting increased footfall in Stocksbridge and increased local spending.

5.6 Review of the 2018 SNPP projections, indicates that the population of Sheffield is forecast to grow by 11% up to 2043 (the end of the projection period). The largest projected increases are within

population 0-10 years, 15-19, and 30 – 45 year olds, all sections of the population that are underrepresented within Stocksbridge in comparison to the Sheffield Averages. Significant increases are also anticipated in the older age groups 70- 90 year olds, where there is an overrepresentation within the LHMA.

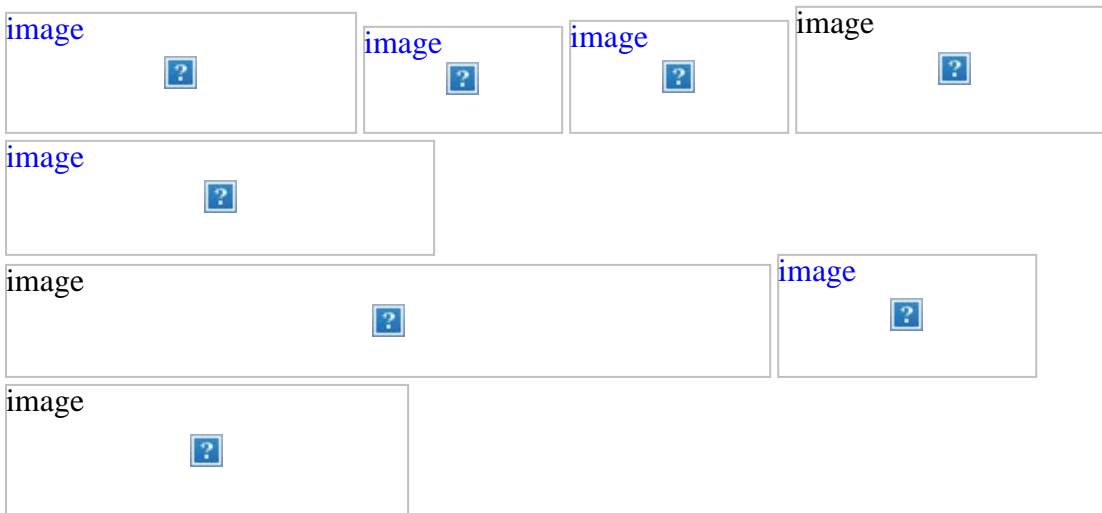
- 5.7 Emerging Local Plan identifies Stocksbridge and Deepcar as a Principal Town, the emerging strategy indicated that the Main Urban Area and the two principal towns, including Stocksbridge and Deepcar will be a focus for growth. Accordingly, it is vital that the market in Stocksbridge and Deepcar makes provision for sufficient homes of the right size, type, mix and tenure, to meet current demand and emerging needs.
- 5.8 This is even more important in the context of Investment anticipated in Stocksbridge and Deepcar. Including bid for £25 million in the Towns fund. The Stocksbridge Town Investment Plan indicates that the plan includes the diversification of the economy through the creation of flexible employment space, accommodation of circa 200 jobs in key growth sectors, 5.1 km improved cycle and walking trails, new local bus services, and post 16 provision, and improvement's to the town centre, on top of the recent investment at Fox Valley. In addition to the Towns Fund Bid, is the bid to reinstate passenger services to Don Valley Railway. If funding is secured this will bring significant improvements in connectivity, significantly reducing travel times to Sheffield City Centre and beyond, and will drive further investment in Stockbridge.
- 5.9 Therefore, there is a need to increase the number of homes and diversify the housing stock within Stocksbridge/Deepcar. It is not just important to deliver the right number of homes within Stockbridge/Deepcar, but it is essential that homes of the right type and tenure are delivered, this will not only support Stocksbridge/Deepcar but could also support the wider Sheffield City and stem the significant outflows from the City into neighbouring areas.

From: [Andrew Rose](#)
To: [SheffieldPlan](#)
Cc: [Simon Vincent](#); [Laura Stephens](#)
Subject: RE: Publication (Pre-submission) Draft Sheffield Plan 2022 (Strata: Whitley Lane)
Date: 20 February 2023 17:15:05
Attachments: [image001.jpg](#)
[image002.jpg](#)
[image003.gif](#)
[image004.jpg](#)
[image005.jpg](#)
[image006.jpg](#)
[image007.jpg](#)
[image008.jpg](#)
[image009.png](#)
[image010.jpg](#)
[Appendix 2 - Advocacy Report.pdf](#)
[P4156-SPA-RP-TP-003-B- Local Plan Reps.pdf](#)
Importance: High

Hi,
On behalf of Strata Homes, please find attached our response to the Pre-Submission Draft Sheffield Local Plan consultation for their site at Whitley Lane, Ecclesfield.
We trust that you will confirm that these representations are duly made and will give due consideration to these comments.
Please do not hesitate to contact us to discuss any issues raised in this Representation further.
All the best, Andy
Kind regards
ANDREW ROSE
Associate Director: Chartered Town Planner
BSc (Hons), MSc, PG DIP, MRTPI



Junction 41 Business Court, East Ardsley, Leeds, WF3 2AB
Main: 01924 873873 Web: www.spawforths.co.uk
Direct: - Email: andrew.rose@spawforths.co.uk
Mobile: NEW 07841 621216 LinkedIn:



From: SheffieldPlan <sheffieldplan@sheffield.gov.uk>
Sent: 09 January 2023 10:56
Subject: Publication (Pre-submission) Draft Sheffield Plan 2022
Dear Agent
Publication (Pre-submission) Draft Sheffield Plan 2022
Consultation pursuant to Regulation 19 of the Town and Country Planning

(Local Planning) (England) Regulations 2012

We are preparing a new local plan, which, when adopted, is expected to be called “the Sheffield Plan”. Following public consultation on ‘Issues and Options’ in 2020, the Publication (Pre-submission) Draft Sheffield Plan is now ready for consultation. The Publication Draft Plan represents the Council’s formal proposals on how the city should grow and develop over the period to 2039. It covers the whole of Sheffield except for the part of the city that is in the Peak District National Park. We are asking for comments and feedback on whether the Plan has been prepared in accordance with legal and procedural requirements, and whether it is sound. Plans are sound if they are:

- a) **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;
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework and other statements of national planning policy, where relevant.

The statutory public consultation is available for a 6-week period from Monday 9 January to Monday 20 February 2023. A full **Statement of the Representations Procedure** is attached to this email.

You can read the Publication Draft Sheffield Plan on the [Consultation Portal on the Council’s website](#). You can also view the other supporting documents that we will be seeking comments on, together with other background documents that you may find helpful to refer to.

To make your comments visit the Consultation Portal from 9 January. Please make your comments no later than 11.59 pm on Monday 20 February.

Details of all the consultation events are also available on the Consultation Portal (which can also be accessed from the Council’s website).

Why we are writing to you

We are writing to you as you as a statutory consultee or because you have previously expressed an interest in being kept informed about the new local plan. Consequently, you are on our mailing list of contacts for this group and will have signed up to our ‘terms and conditions’.

The data you give us

Under the General Data Protection Regulation 2016 (GDPR) and Data Protection Act 2018 (DPA) Sheffield City Council is a Data Controller for the information it holds about you. The lawful basis under which the Council uses personal data for this purpose is consent.

All representations are required to be made public and will be published on the Council’s website following this consultation. Your representations and name/name of your organisation will be published, but other personal information

will remain confidential. Your data and comments will be shared with other relevant agencies involved in the preparation of the local plan, including the Planning Inspectorate. Anonymous responses will not be considered. Your personal data will be held and processed in accordance with the Council's Privacy Notice which can be viewed at: <https://www.sheffield.gov.uk/utilities/footer-links/privacy-notice>

How to contact us

If you would have difficulty accessing any of the consultation documents via our website or accessing the Consultation Portal, or you need any further advice or information, please contact us at sheffieldplan@sheffield.gov.uk. You can call us on 0114 2735274.

Please also email us at the above address if you no longer want us to contact you about the Sheffield Plan.

Yours faithfully

Simon Vincent

Simon Vincent
Strategic Planning Service Manager
Planning Service
Sheffield City Council

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Strata Homes

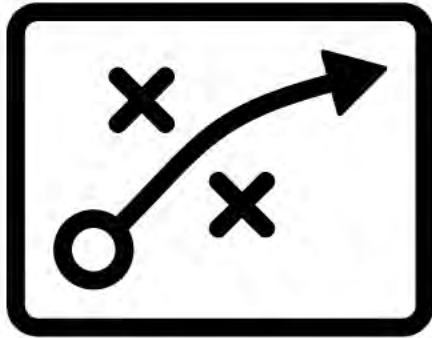
Whitley Lane, Ecclesfield

Advocacy Report

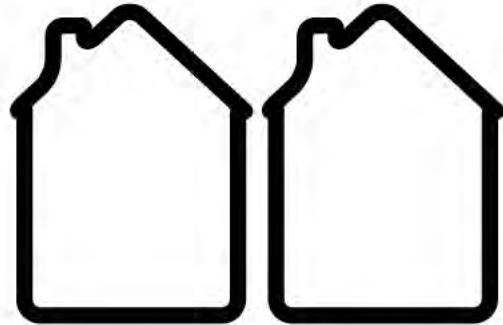
Revision A | Sept 2021



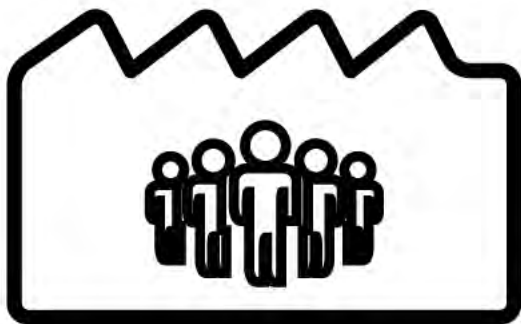
Benefits



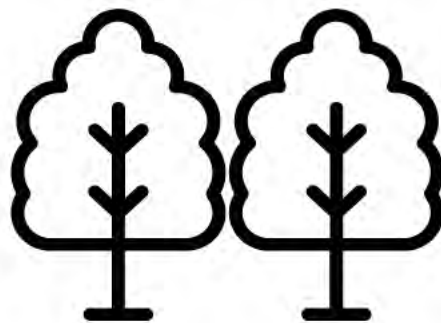
Optimum location for growth



Approx. 100 new homes to meet Sheffield's Housing Need



New homes to support employment growth



Integration of new housing within the landscape

Introduction

This document illustrates the vision for the Whitley Lane site and seeks its allocation for housing within the emerging Sheffield Local Plan. The site is proposed to deliver new housing within a landscaped setting in a sustainable location in Sheffield.

About Strata Homes

Strata Homes is a family business, which is focussed on “building a legacy”. Strata makes homes and therefore exists to make a new way of living. A lifestyle that demands more from the everyday.

Strata Homes is a Yorkshire business. Founded in 1919 as Weaver Construction has now grown into the Strata brand today, and the impact made by four generations of family continually influences how the business is shaped.

Strata Homes is about more than just bricks and mortar. It is about creating a unique and personalised space to live and grow, in a community of likeminded individuals.

Whitley Lane

The site at Whitley Lane creates a unique opportunity to develop high quality homes in a sustainable location close to existing services and facilities, employment opportunities and public transport routes. The proposed scheme can deliver new homes within a landscaped setting and green network, creating a healthy lifestyle and new way of living.

The site at Whitley Lane can deliver significant benefits within the vision for growth that the city and region aspires. This site which is eminently accessible to the city centre, the M1 Motorway and the wider region can facilitate that process.

Scope

This Advocacy Report sets out the context and ambitions for the Whitley Lane site before analysing and explaining the site’s availability, suitability and achievability and therefore deliverability in the context of the National Planning Policy Framework (the Framework).

An indicative masterplan for the site will show the potential for the site including green and blue infrastructure, movement and connectivity. The proposal provides significant benefits which are explained throughout the report including the provision of a range and choice of new high quality, zero carbon homes.





360, Chesterfield

Strata Homes' Philosophy

Being a family owned business for over a century, Strata Homes have developed certain traits over time. Continuously striving to become better is definitely one of them and a desire to improve people's lives drives everything Strata Homes do. They are passionate about design and detail but, above all, Strata Homes care greatly about every single home that they build. Their pioneering spirit is founded upon years of experience and a genuine motivation to do the right thing.

Exemplar Development

360 is Strata Homes' development of zero carbon homes in Chesterfield. Here they designed a range of high quality, zero carbon homes at affordable prices.

The sustainable timber engineered homes are constructed offsite, ensuring efficiency and the highest quality standards. The closed panel design helps to keep the heat in and the draughts out, this means the homes cost significantly less to heat, and exceeds the standards of a traditionally built home.

Strata Homes believe a home should provide a safe place and protect from external influences which may adversely affect wellbeing and actively promote good health. Reducing the running costs of the home will enable the resident to have more disposable income, reducing fuel poverty and having a positive impact on the local economy.

Sustainable Design at Whitley Lane

Being close to existing services and facilities as well as public transport to the wider City and region makes the Whitley Lane site the ideal location for new homes. This will allow the creation of high quality new homes and also support the new residents in making sustainable movement choices.

The Whitley Lane site is an opportunity to create a truly sustainable housing development for the twenty-first century.

Sustainable City Principles

(Sheffield's Green Commitment, Sheffield Green Commission, 2018)



connected City

low-emission
digitally connected
affordable
integrated
clean

The graphic features a blue background with a stylized train and a cyclist. The word 'connected' is in white, and 'City' is in a larger white font with a silhouette of a person and a child inside the letter 'i'.



Transformative energy

renewable
secure city
low-emission
locally owned
energy solutions

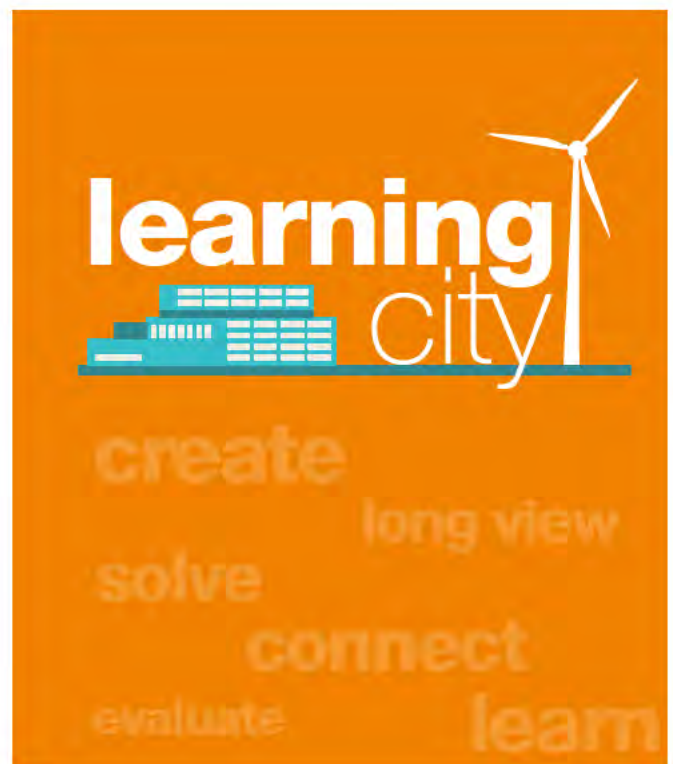
The graphic features a yellow background with icons of a solar panel, a wind turbine, a house, and a car. The word 'Transformative' is in white, and 'energy' is in a larger white font.



European green City

attractive
ecosystem
sustainable
outdoor city
accessible

The graphic features a green background with icons of trees, a bench, and a butterfly. The word 'European' is in white, and 'green City' is in a larger white font.



learning city

create
long view
solve
connect
evaluate
learn

The graphic features an orange background with icons of a building and a wind turbine. The word 'learning' is in white, and 'city' is in a larger white font.

Drivers for Sheffield

The Whitley Lane site provides a unique opportunity to deliver high quality new homes within a landscaped setting close to existing services, facilities, employment, public transport routes and the M1 Motorway. The site is accessible to Sheffield City Centre and the wider region.

The site at Whitley Lane site aims to deliver high quality sustainable new homes.

The themes and drivers towards the site embrace the strategic objectives of the city, which is towards a cleaner and greener city. The Green City Strategy is for a low carbon, resilient and sustainable Sheffield.

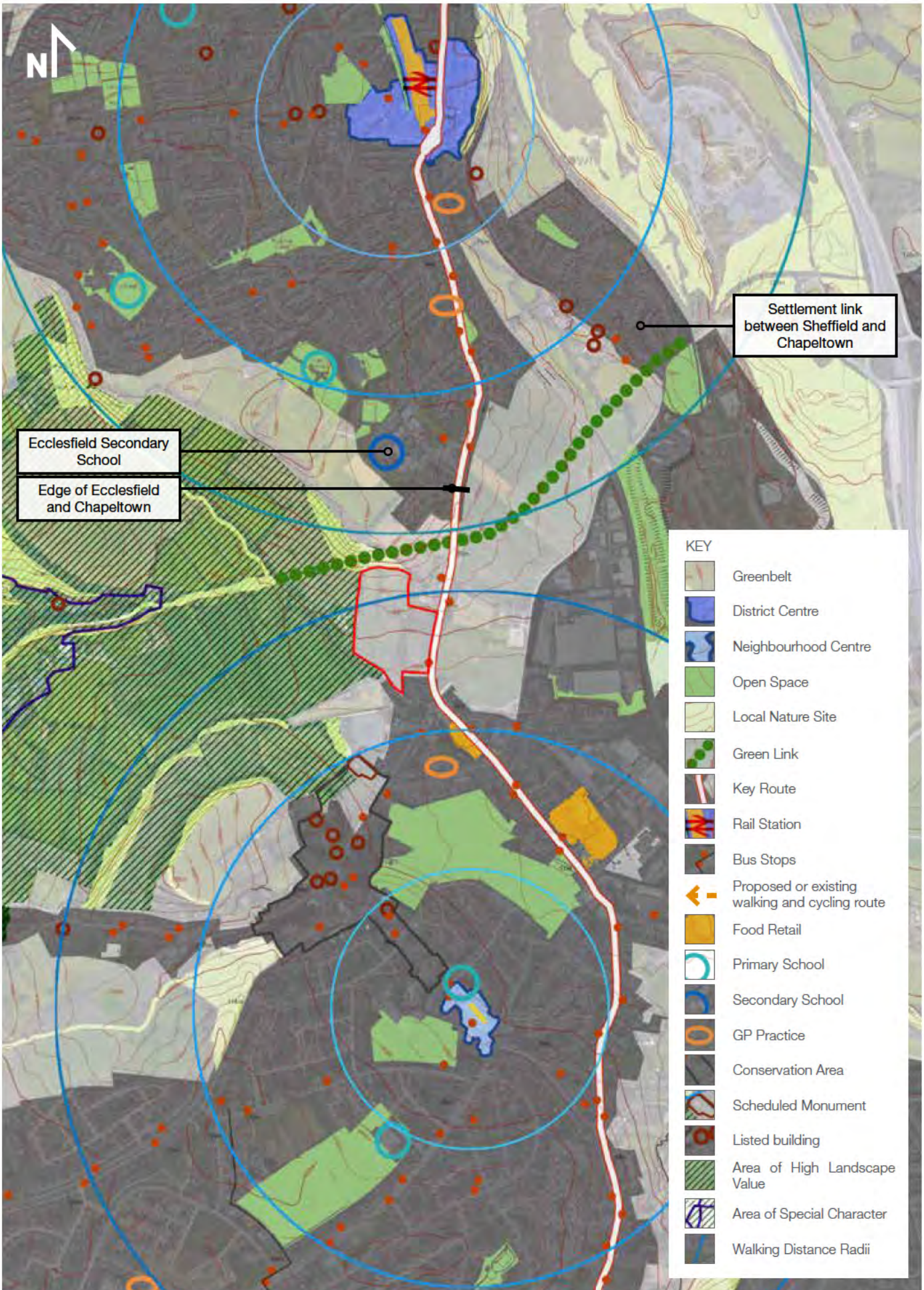
The strategy explains that the move towards a lower carbon and cleaner economy would enable the city to grow and evolve whilst at the same time improving the environment and the quality of life of the residents. Sustainability and climate change resilience is a priority for the strategy, which contains 12 priorities, including: reducing impact on the climate; a climate resilient city; sustainable and affordable energy; modern, reliable and clean journeys; clean air for all; and a green and innovative economy.

The Sheffield Green Commitment reflects a similar approach, which has been developed by the Sheffield Green Commissioners and has developed a vision of a sustainable city based on the following four principles:

- **Connected City:** A city with transportation systems that are efficient and affordable, reliable and clean, simple and intuitive, networked and integrated, and low-emission.
- **Transformative Energy:** An energy secure city with transformative affordable, clean, efficient, low- mission, networked, renewable, resilient, simple and locally owned energy solutions.
- **European Green City:** Sheffield is a green city both in its urban core and its surrounding landscape and this is part of its attractiveness and distinctiveness. A city with an accessible, ambitious, bold, biodiverse, equitable and high-quality, well-designed formal and informal landscape that is sustainable to maintain and delivers a myriad of benefits.
- **Learning City:** Sheffield is committed to continuous learning about how to give the city a smart and sustainable future. This includes learning from and collaborating with other cities and education institutions.

These themes focus towards sites that are accessible to employment, retail and leisure spaces, and also accessible to public transport routes. These principles also highlight opportunities for place making and place shaping and the creation of high quality new homes. The site at Whitley Lane enshrines and can facilitate the achievement towards all of these goals.

Importantly, the site is close to services, facilities, employment opportunities and is accessible to the region by public transport and is near to Junction 35 of the M1 Motorway. This alongside the ability to create new and enhanced green routes and the accessibility to green spaces close to the site creates a healthy environment for residents.



Settlement Analysis

Why Whitley Lane?

The land at Whitley Lane is well served by public transport and local facilities and services. The site is in an accessible and sustainable location on the edge of the main Sheffield urban area with access to a wide range of facilities, services, transport routes and employment opportunities.

Perceived Settlement

The separation of Chapeltown and the Sheffield Main Urban Area settlements are difficult to perceive in reality. Ecclesfield forms part of the Sheffield Main Urban Area and this links, along the Blackburn Brook, with Chapeltown. Equally the sign indicating the edge of Ecclesfield and Chapeltown is located within the settlement perceived as Chapeltown on the A6135 (Chapeltown Road)

Sustainable Transport

The site is an extremely sustainable location with approximately 13 buses an hour providing sustainable transport access to Sheffield, its suburbs and villages such as High Green as well as into Barnsley Town Centre.

Buses can also be caught from the bus stop adjacent to the site towards Chapeltown providing access to Chapeltown Railway Station which in turn provides a twice-hourly service to Sheffield, stopping at Meadowhall, and hourly services to Leeds and Huddersfield.

Highway Network

The M1 Motorway Junction 35 is 1.5 miles from the site providing access to the wider region and country by car.

Employment Opportunities

The nearby Smithy Wood Business Park and Provincial Park on Nether Lane provide employment opportunities which are close to the site with further employment to the north of Morrisons on Station Road in Ecclesfield.

The regular public transport passing the site also creates opportunity for employment at Meadowhall or within Sheffield, Barnsley, Huddersfield or Leeds.

Local Facilities

There is an ALDI supermarket within 400m of the site and a Morrisons supermarket within 800m as well as other shops and facilities within Ecclesfield including medical facilities. Chapeltown District Centre is a mile from the site and provides further facilities including an ASDA supermarket.

On the opposite side of Chapeltown Road is a sports

ground providing space for playing sport and Ecclesfield Park is within 400m of the site.

Coit Primary School, Ecclesfield Secondary School and Chapeltown Academy are all within 800m of the site providing access to all levels of education.

Character and Setting

Ecclesfield has a well established conservation area which focuses on the area surrounding the junction of Church Street and the High Street/St Mary's Lane. From the site it is possible to see the tower of the Listed St Mary's Parish Church which sits at the heart of the conservation area however it is not possible to see the church tower from Chapeltown road, due to existing, established vegetation. It is also not possible to see the site from ground level in the conservation area.

The site is also adjacent to but outside of an Area of High Landscape Value which surrounds the Area of Special Character surrounding Whitley according to the UDP Proposals Map.



Agenda, Wakefield (Strata Homes)



Finesse, Leeds (Strata Homes)

Housing Need

There is a significant and recognised housing crisis within the UK. The country needs to provide around 300,000 homes per year to keep up with population growth and to start to tackle years of undersupply. Housing provision within Sheffield over the Local Plan period should be approximately 2,400 to 3,000 dwellings per annum to support planned future economic growth.

The National Planning Policy Framework states that local authorities should meet their objectively assessed housing needs in full and to boost significantly the supply of housing. The emerging Local Plan recognises the need to deliver a supply of housing to support economic growth to create sustainable communities.

The current Covid-19 Pandemic and the previous 2007/08 Global Financial Crisis and recovery has impacted on the housing market meaning schemes that assist economic and housing growth are high on the Government's priorities. The Government's policy agenda through the Framework, Ministerial Statements, Budgets and Planning White Paper recognise the importance of housing and the significant economic imperative of encouraging new development proposals.

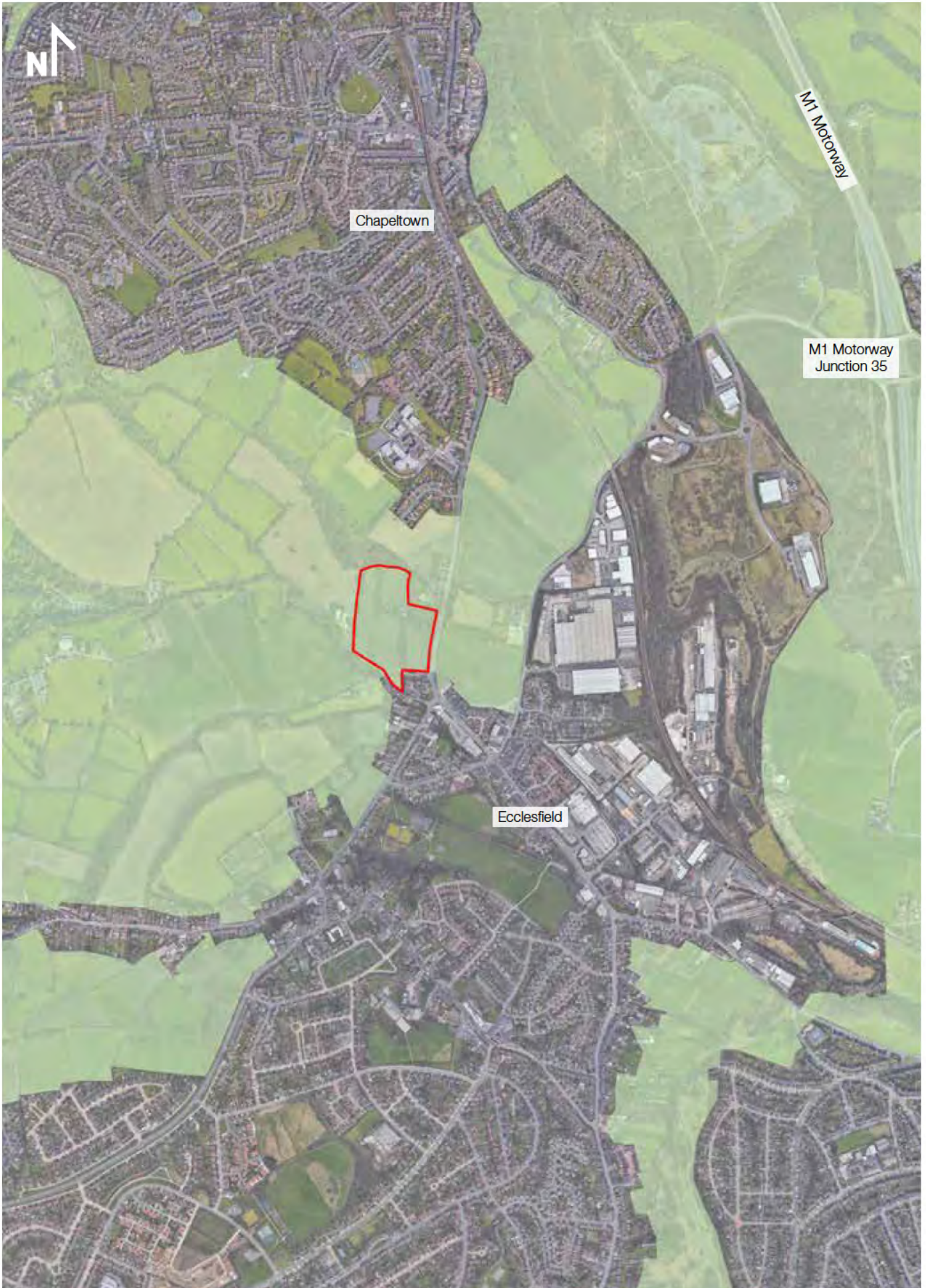
Sheffield is the driving force in the Sheffield City Region. The Region forms a key economic area

between the rest of Yorkshire and the North of England, and the Midlands and the South.

The Government's current standard methodology for the assessment of housing need indicates that Sheffield should provide 2,131 homes per annum. However, this does not allow for economic growth and the Strategic Economic Plan or affordability issues. The SEP vision aims by 2040 to create 33,000 extra people in higher level jobs and an extra £7.6bn growth in Gross Value Added in the economy. The vision also sets out to grow wages and for people to live longer with healthier lifestyles and for a net zero carbon city region. Given that Sheffield is the largest conurbation, and fourth largest city in England it is reasonable that the city allow for significant economic growth to raise the aspirations for the region, reflecting the SEPs target and to deliver circa 2,400 to 3,000 new homes in Sheffield during the Local Plan period.

The development of new housing will bring forward additional economic benefits to Sheffield. The relationship between economic performance in an area and housing is complex, but having the right quantity, quality and balance of housing in an area is necessary for economic growth. The development of new housing can therefore support local economic growth, both through direct job creation through the construction phase of the scheme, but also through the increased population which will create sustainable local jobs from the increased demand for goods and services. This provides an important development opportunity for Sheffield.

Whitley Lane is in a sustainable location and will provide new high quality homes close to employment and sustainable transport connections. The site is an opportunity to provide quality housing in a sustainable location to help to meet the housing needs of Sheffield.



Green Belt Justification

The housing needs of Sheffield and the Sheffield City Region will require Sheffield City Council to review the Green Belt Boundaries within the city. Spawforths have previously prepared and submitted a Green Belt Assessment. The land at Whitley Lane is an opportunity to positively adjust the Green Belt boundary and form a new robust and long lasting boundary.

Sheffield is enveloped by the South Yorkshire Green Belt which is placing a significant pressure on housing delivery. Paragraph 140 of the Framework considers that Green Belt boundaries can change “in exceptional circumstances”. Such a circumstance exists through the significant need to provide housing in Sheffield. To meet the housing need and economic growth aspirations Sheffield City Council will need to revise the Green Belt boundaries for the emerging Local Plan and beyond to provide the new boundaries with some permanence.

The Framework establishes five purposes for including land within the Green Belt. Having reviewed the site at Whitley Lane against the purposes of Green Belt the allocation of the site for housing will not undermine the integrity of the Green Belt:

To check unrestricted sprawl

The site is relatively contained by the surrounding landform, vegetation and existing built form and will not lead to unrestricted sprawl or encroachment. The site is located on the edge of Ecclesfield, Sheffield with residential development located to the south, west and to the North.

To prevent neighbouring towns from merging

The contained nature of the site, including topography and boundary treatment mean that the site would not lead to the coalescence of towns.

To assist in safeguarding the countryside from encroachment

The site is relatively contained by topography, and existing boundary treatment. The perception of any encroachment into the countryside is minimised by the level of urban influence at this location and the relative containment of the site.

To preserve the setting of historic towns

The site will have no impact on the setting of a historic town.

To assist in urban regeneration

The presence of existing residential development on Chapeltown Road, Immediately to the north of Whitley Lane limit the perception of openness in the area. The impact of development at Whitley lane on the openness of the Green Belt is further limited by the areas position within the wider landscape and existing vegetation.

The current location of the Green Belt boundary at this location is not robust and does not accord with the Framework where boundaries should be clearly defined using readily recognisable features to ensure permanency. In this area the Green Belt boundary is drawn tightly along the rear garden boundaries of properties along Chapeltown Road/Whitley Croft.

The proposed new boundary would be defined by LWS Hunshelf Woods to the north and North West, Whitley Lane to the South, and existing development and small section of hedgerow to the west. This boundary would accord with the Framework and ensure that the Green Belt is clearly defined using readily recognisable features to ensure permanency reinforcing the urban context whilst providing a robust boundary for the future.

All the site boundaries have the potential to be reinforced through additional planting to provide an effective transition between the development and the countryside beyond. There is also the potential to enhance existing connections between the urban area and wider countryside.



Site Location Plan

Available and Suitable

The following sections of the Advocacy Report will show that the Whitley Lane site is available, suitable and achievable to meeting the identified housing needs and represents a sustainable residential opportunity on the edge of an established city where there are limited alternative opportunities for growth. The site is controlled by Strata Homes with an expert technical team to support the delivery of the proposed scheme.

Availability

Strata Homes have a legal agreement with the landowners to promote and develop the land for housing.

Strata Homes are a well-funded home builder with a strong demonstrable track record of delivery of high quality new homes in the north of England. They are committed to develop the site and have appointed a technical team to provide the resource, expertise and experience to build the proposed scheme.

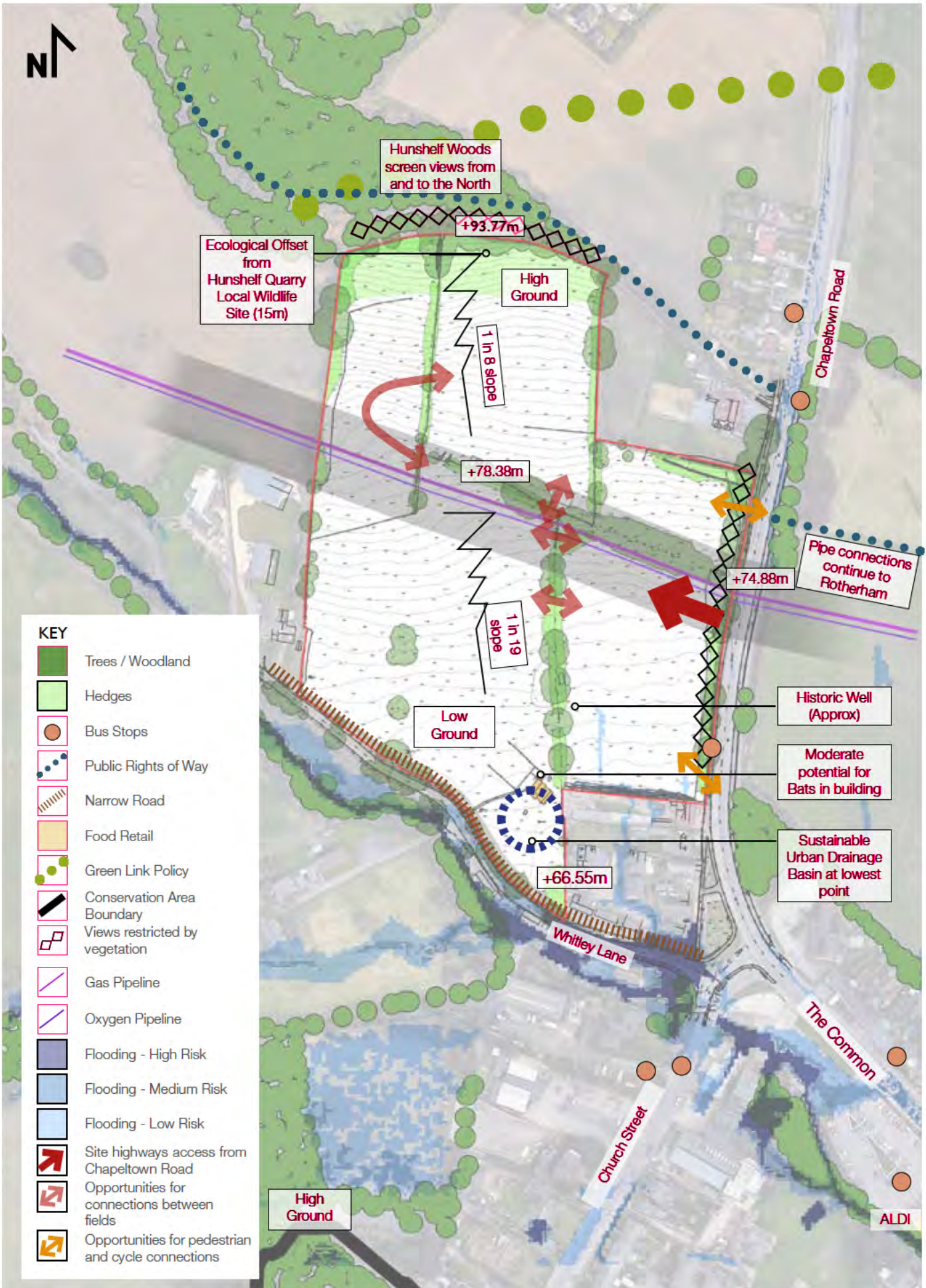
The land is therefore “available” in accordance with the Framework and the Planning Practice Guidance (PPG).

Suitability

The proposed development can make an efficient and attractive use of the land. Although Green Belt land the site does represent an excellent opportunity for future housing and development in Sheffield. This site would allow housing to be delivered within an appropriate and sustainable location and accord with the emphasis set out in the Framework to make more efficient use of land. The site benefits from being located close to employment and food retail opportunities with public transport providing access to further retail and leisure facilities including Ecclesfield Local Centre, Chapeltown District Centre, Meadowhall and Sheffield City Centre. There is an ALDI supermarket within 400m of the site and a Morrisons supermarket within 800m. There are also a number of schools close to the site.

Sheffield City Council recognises the need for Green Belt Review to support the growth and regeneration ambitions for the area. The site provides an important opportunity to meet the housing needs of Sheffield, which provides the exceptional circumstances to justify the release of the site from the Green Belt. The development will provide additional quality development that will benefit the settlement and wider district with economic, environmental and social benefits. The sustainability credentials of the location demonstrate that this is a suitable site for removal from Green Belt to deliver new homes.

The development will benefit Sheffield and the wider City Region with economic, environmental and social benefits. The site and proposals are therefore “suitable” in accordance with the Framework and PPG



Site Analysis

Opportunities and Constraints

The proposed residential development site extends to approximately 5.86 Hectares. Views to and from the land to the north of the site are restricted by the existing woodland on Hunshef Lane which create a strong northern boundary.

Access

The most suitable highway access is from Chapeltown Road which is a wide A road with verges to the western side of the road.

Whitley Lane is a narrow country lane without footways and with little opportunity for widening to accommodate greater traffic or pedestrian movements.

Hunshef Lane to the north of the site becomes a Public Right of Way which passess close to the northern boundary of the site.

Topography

The site slopes down from north to south providing the site with a south-facing aspect and allowing the site to integrate with Sheffield to the south.

Ground

In the south-eastern field there is a historic well which will require capping. Therefore, there are no ground condition matters which cannot be mitigated.

Flood and Drainage

The site can be drained from the most southern point into the unnamed brook to the south of Whitley Lane.

Water will be held within the site and then discharged at existing green field run-off rates.

Heritage

The tower of the listed St Mary's Parish Church in Ecclesfield Conservation Area can be seen from the site, but views to the site from the Conservation Area are not possible due to the existing vegetation between the site and the conservation area.

Ecology

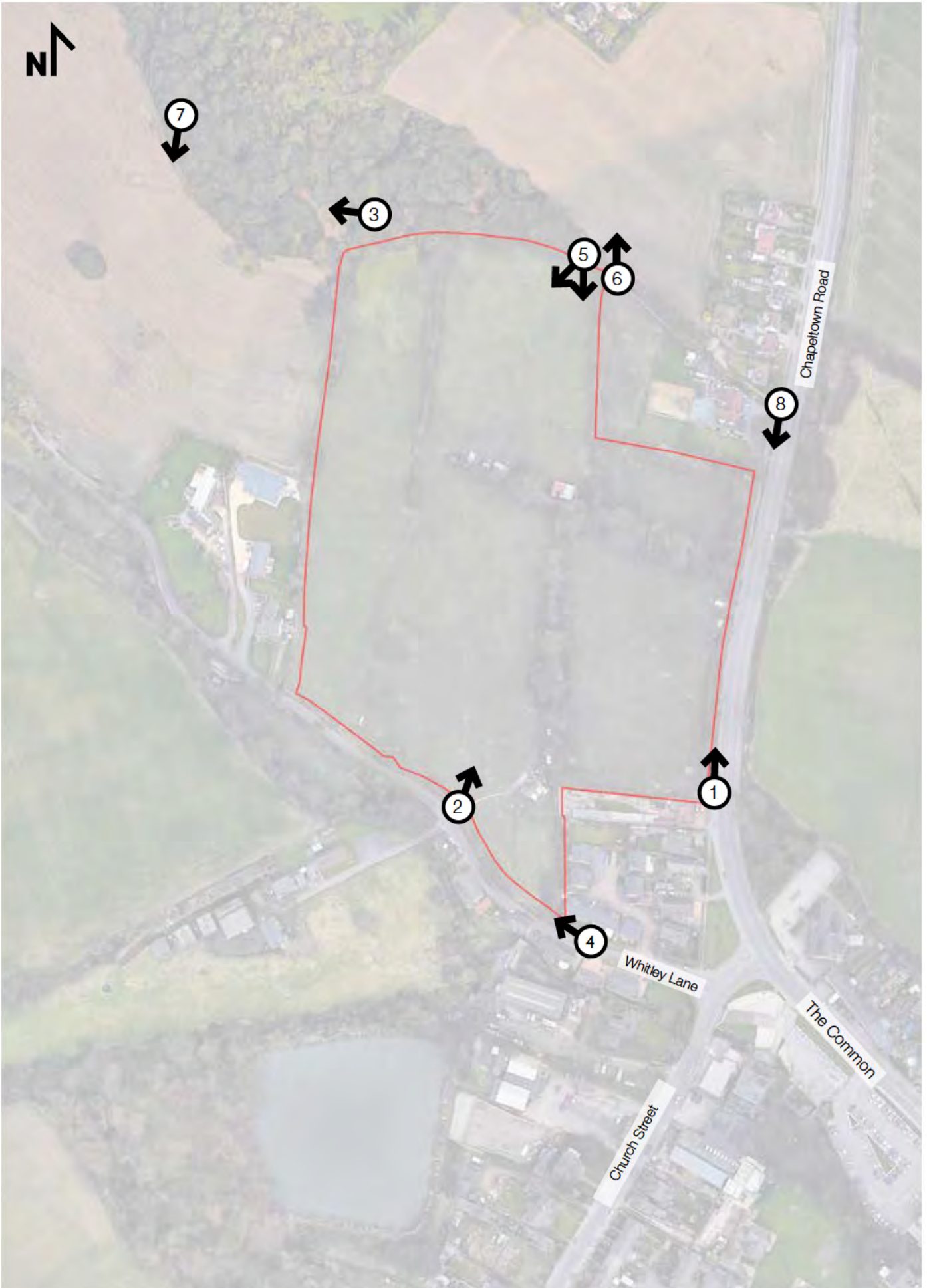
Where possible trees and hedgerows should be retained and will assist in creating an accessible green network.

Movement and Connections

The site has excellent highway connections, being located on the A6135 with four bus stops with up to 13 buses an hour within five minutes walk. Ecclesfield and Chapeltown centres and facilities are therefore easily accessible from the site.

A footway to the east of Chapeltown Road provides links across the adjacent sports ground to the Provincial Park Industrial Estate.

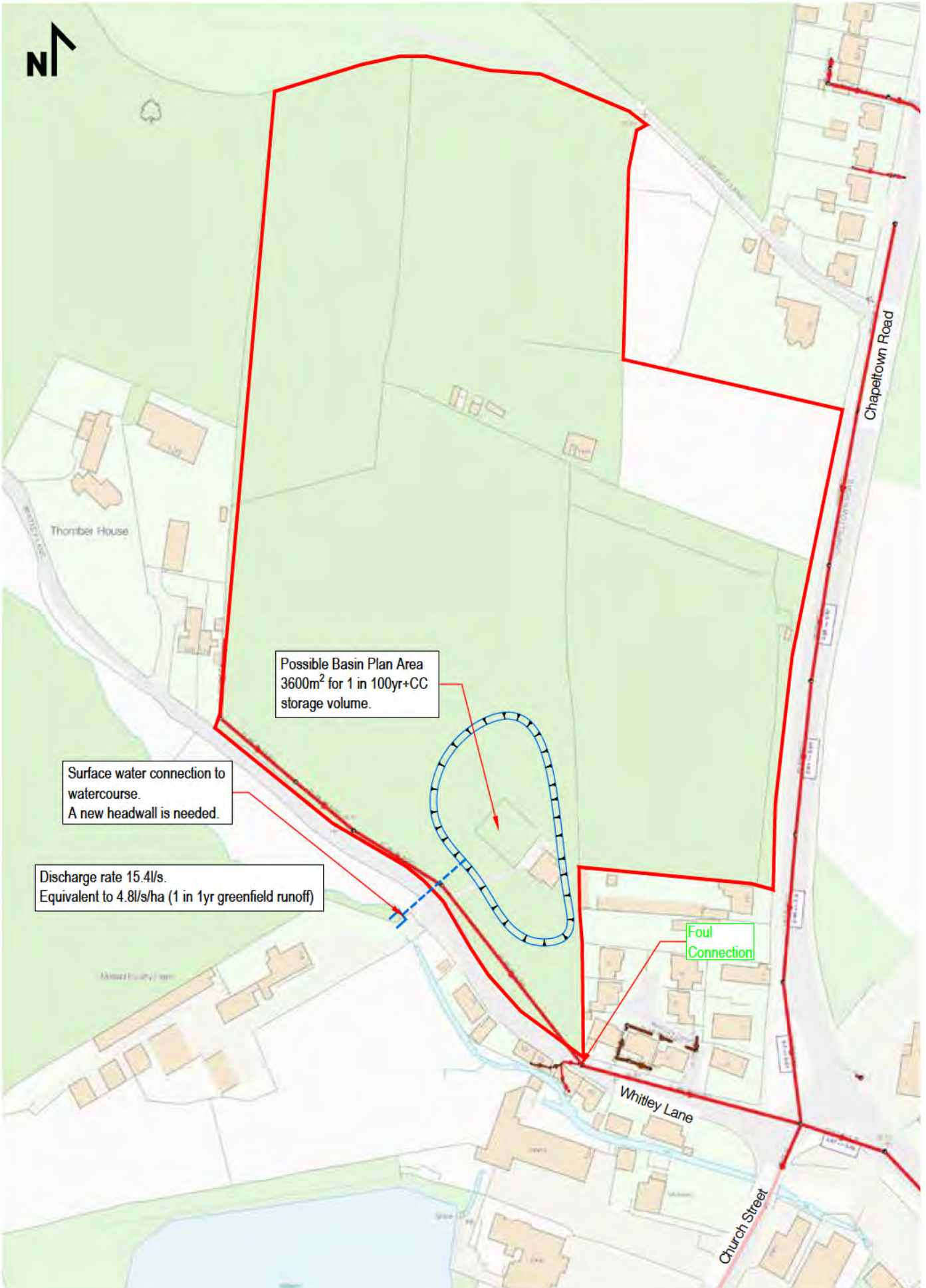
The footpath along the northern edge of the site provides connection to western Chapeltown and Whitley.



Site Photograph Locations

Photographic Survey





Flood Risk and Drainage

Eastwood and Partners have prepared a Flood Risk Assessment for the site and demonstrates that the site is not at risk from flooding.

Flood Risk

The report demonstrates that the site lies within Flood Zone 1 and confirms that the site is not at significant risk of potential flooding from any source. Therefore sequential testing is not required.

The nearest watercourse is an unnamed ordinary watercourse located approximately 20m south of the site, a tributary of Blackburn Brook located approximately 1 km south-east of the site. The site is elevated approximately 2 m relative to the unnamed ordinary watercourse and flood risk from this source is nominal.

The Environment Agency surface water flood risk map also shows the site to be at very low risk of flooding.

Proposals for Surface Water Drainage

The final disposal strategy for surface water run-off requires detailed consideration and approval during the design phase of the project. The final design will need the approval of the relevant statutory bodies but will broadly follow these principles as shown opposite:

- Surface water disposal will be to the unnamed ordinary watercourse located approximately 20m south of the site, on the southern side of Whitley Lane.
- The permitted discharge will be the variable greenfield rate of between the 1 in 1 year rainfall and the 1 in 100 year rainfall. The flow rate will be in the range of 4.8 l/s/ha (1 in 1 year) and 16.8 l/s/ha (1 in 100 year).
- Attenuation storage for volumes up to the 1 in 100 year plus climate change rainfall will be provided above ground in a detention basin.
- Storage for volumes of up to 3,000 m³ will be contained on-site in a basin. The basin footprint will be approximately 3,600m²

located within the southern extent of the site subject to the proposed layout.

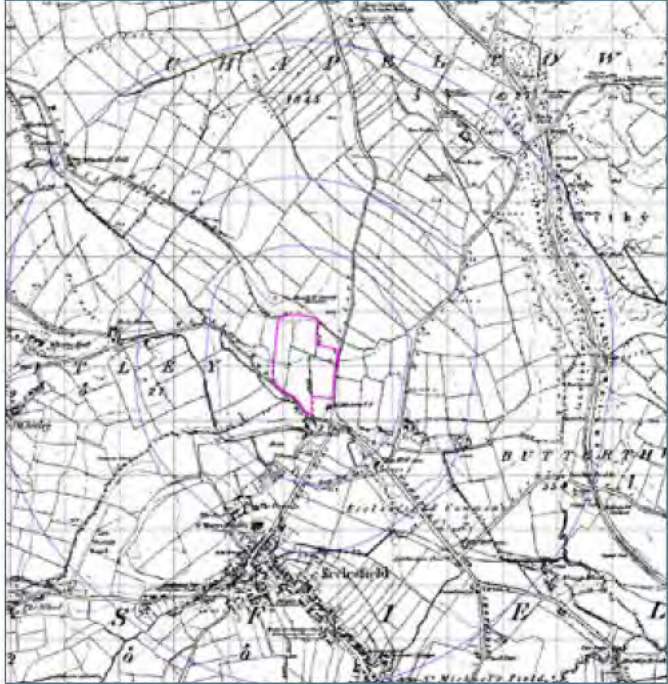
Proposals for Foul Disposal

There is a 100 mm public combined sewer within the site along the southern boundary. The sewer pipe connects to a 150 mm public combined sewer in Whitley Lane, south-east of the site.

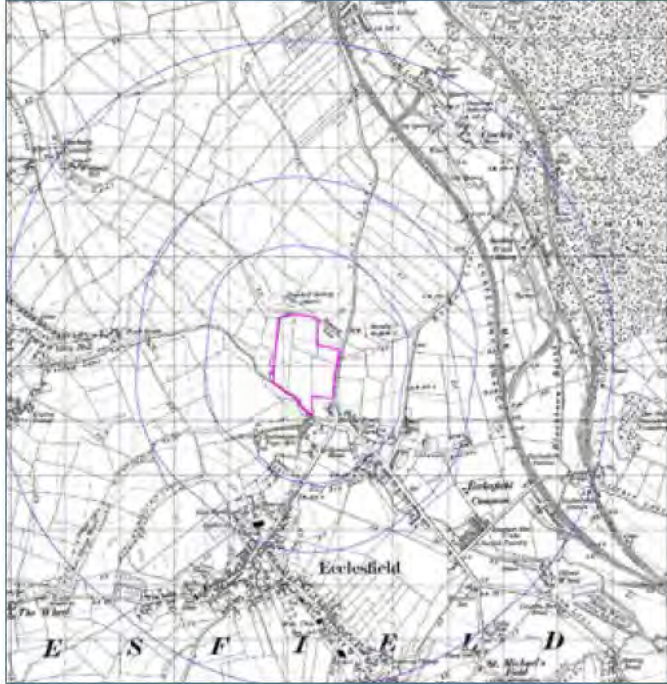
Foul will connect to the 150 mm public combined sewer at a point 10 m to the south-east of the site, subject to Yorkshire Water approval.

Therefore, there are no flood risk and drainage constraints that preclude the development of this site.

1855 OS Mapping



1906 OS Mapping



1935 OS Mapping



1982-1988 OS Mapping



Geotechnical and Geo-environmental

Eastwood and Partners have prepared a Phase 1 Geotechnical and Geo-environmental Site Investigation. The site comprises fields currently used as paddocks. Ground level drops from approximately 95m AOD at the northern end and 67.5m AOD at the southern end. There are no constraints which form significant barriers to the development of the site.

The report shows that there is a gas pipeline crossing the centre of the site from roughly west to east. An easement will likely need to be provided either side of this pipeline within the proposed development.

The geological map indicates the site to be underlain by the mudstone of the Lower Coal Measures strata. The southern tip of the site is shown to overlie superficial alluvial material. Isolated patches of made ground may be present below existing structures on site. Groundwater is expected to be shallow.

There are two coal seams expected at shallow depth below the site of workable thickness. Although the likelihood of both seams being worked is low, a rotary boreholes investigation is recommended to confirm this.

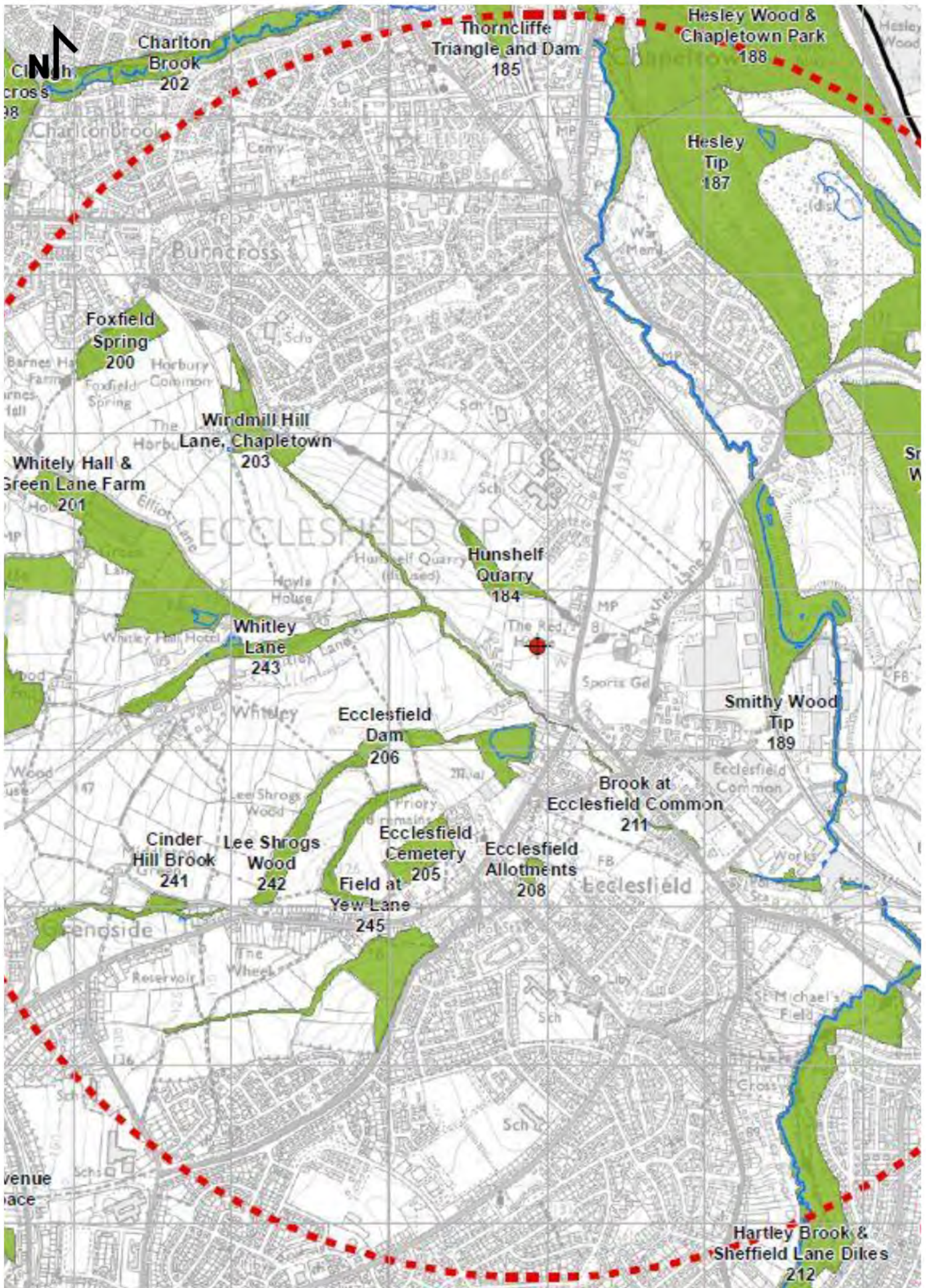
A well is shown in the centre of the eastern half of the site on historical maps, shown opposite. This well will need to be located and capped appropriately.

For the majority of the site, the most economical foundation design is likely to be strip or trench fill foundations taken down onto the natural clay at an assumed minimum footing depth of 900 mm. Where levels are to be regraded, deepened trench fill or even piled foundations may be more appropriate.

Due to the expectation that the underlying natural ground will comprise sandy clay and groundwater will be shallow, soakaways are not expected to be viable.

Where made ground is encountered (i.e. below the stables) an allowance should be made for a 600 mm thick clean capping in gardens and landscaped areas. Alternatively the made ground could be excavated and placed under areas of hardstanding.

Therefore, there are no geotechnical constraints that preclude the development of the site.



Habitat Location Plan

Ecology

Smeeden Foreman has undertaken an Ecological Appraisal for the land at Whitley Lane. The habitats within the proposals site are of varying ecological value. The majority of the grassland is considered to be of limited/low conservation value, predominantly comprising heavily grazed, improved pasture.

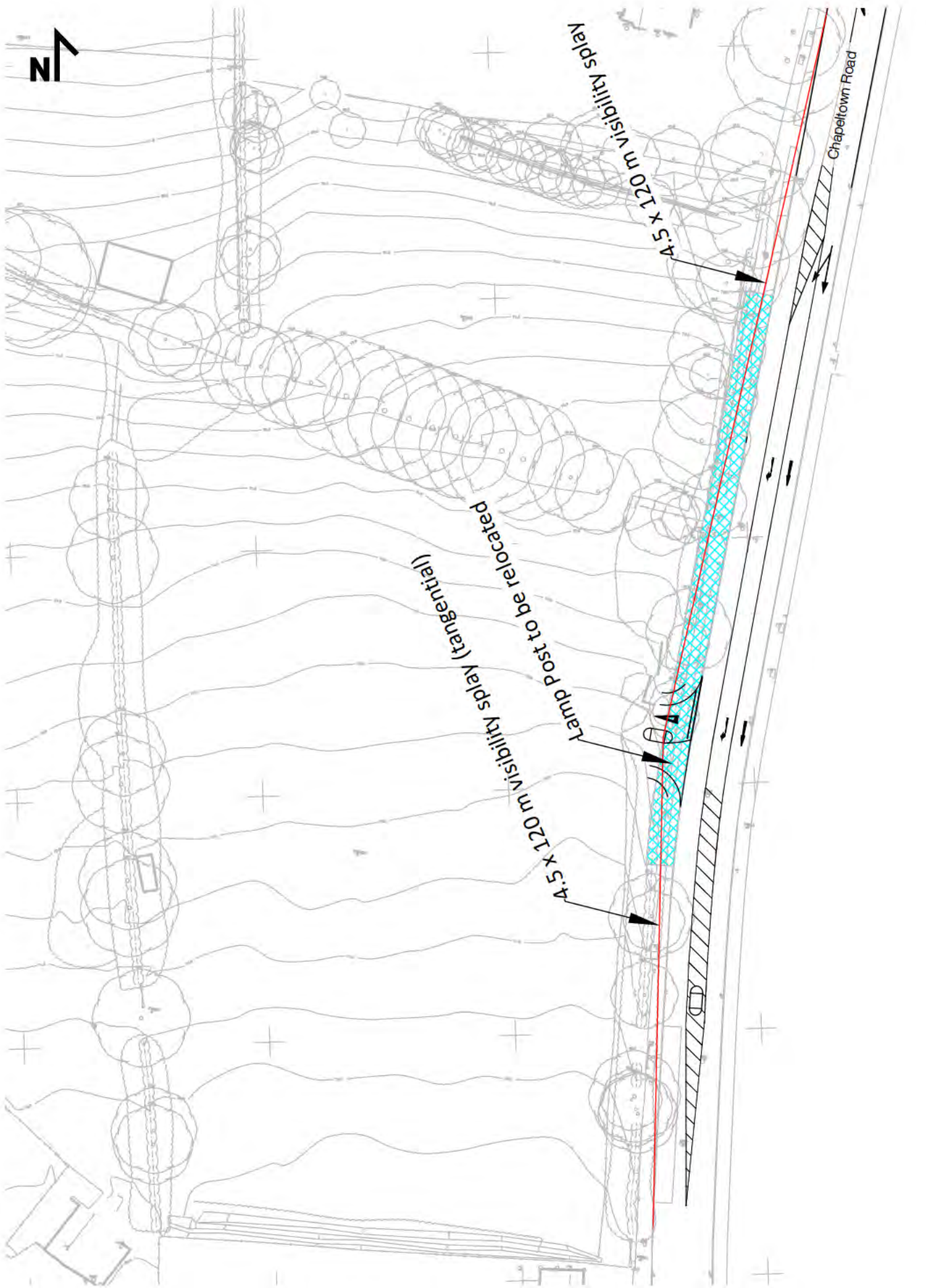
The site is generally horse grazed pasture fields, bounded and dissected by hedgerows and trees. The habitat types consisted of improved and semi-improved grassland, native species hedgerows, scrub and trees.

There are no statutorily designated nature conservation sites and twenty one non-statutorily designated sites within 2km of the proposals site. It is anticipated that there will be no adverse impact on these sites,

The two closest Local Wildlife Sites are Hunshelf Quarry and Whitley Lane, which can be mitigated through the incorporation of appropriate buffer zone, house orientation and style/location of permanent fencing within the scheme layout/design, installation of temporary protective fencing during construction and incorporation of appropriate measures to minimise potential effects on water quality of the adjacent water course during construction and occupation of the development.

In relation to the emerging masterplan for the site, it is recommended to retain trees and hedgerows where possible, introduce replacement planting, incorporate a buffer zone along the northern boundary and seed areas of public open space and associated with hedgerows/tree planting with a suitable wildflower mix.

Therefore, there are no ecological constraints that preclude development of this site.



Vehicular Access Strategy

Highways and Access





The proposed access is from Chapeltown Road forms the vehicular access to the site. There is opportunity within the existing carriageway for the provision of a Ghost Island Right Turn lane for traffic approaching from the north and this will allow the creation of crossing islands within the chevrons.

The plan opposite illustrates how the highway access from Chapeltown Road could be achieved. The option proposes refuge islands for pedestrian crossing however it may be necessary for the crossings to be TOUCAN or PUFFIN. All options can be accommodated within the proposed scheme.

Therefore, there are no highways or access constraints that preclude development of this site.



KEY

-  SUDS Feature
-  Green route through site
-  Opportunities for biodiversity connections between fields
-  Proposed Settlement Boundary

Design Principles

A number of design principles have been identified as a result of the baseline assessment. These could provide the basis for future planning applications.

Blue Infrastructure

SUDs is provided in a single detention basin at the lowest (southern) point of the site. Residential units will be arranged to look over this space. The basin will be able to perform multiple functions, supporting which will be dry the majority of the time.

Green Infrastructure

The public open spaces within the development are located to form gateways to the development and adjacent to public routes to encourage use. Residential units should seek to overlook these spaces to provide passive surveillance.

It is proposed that the majority of trees and hedgerows within the site should be maintained where possible. This has divided the site broadly into two areas with a green route passing east-west through the site creating a habitat route linking the surrounding green spaces through the site.

This green route will also provide the majority of public open space and acting as a spine around which the development can focus.

A green buffer has been indicated on the northern boundary of the development. This buffer serves to distance the new development from flora and fauna within the Hunshelf Quarry Wildlife Site to the north as well as supporting proposals for a Green Link from Whitley to Chapelton. In addition this green space will also reduce the visibility of the proposed development from Ecclesfield Conservation Area.

Sustainability and Climate Change

Locating the new development close to existing facilities and with good access to public transport will provide the residents with opportunity to reduce their travel using private cars and support active and sustainable travel choices.

Strata Homes deliver high quality housing products which seek to minimise their impact from energy use on the environment. This approach, along with sustainability benefits from location will make Whitley Lane a sustainable development for Sheffield.



Design Principles





Design Principles

Design Principles

Connectivity and Movement

Vehicles access the site from a single point on Chapeltown Road and enter the development alongside the public open space.

The proximity of bus stops and local shops to the site should encourage walking and cycling to use these facilities. This will be encouraged by the provision of island refuge crossing points within Chapeltown Road. These islands will be located to link into existing public rights of way.

New public footpaths through the development will also link Whitley Lane to the south with Hunshelf Wood to the north.

Trees and hedgerows within the site will be maintained where possible to form green routes to provide attractive sustainable movement routes.

Land Use

The total proposed site area is 5.86 Ha or 14.48 acres of land. Given the constraints and requirements of the site there is approximately a NET area suitable for development of 3.45ha. This could support a development of approximately 100 new homes at development densities which reflect those found in the surrounding area.

Placemaking

The following design principles could inform the development of the detailed plans as follows:

- There is opportunity for two character areas within the site separated by the green spine.
- Buildings should provide continuity and enclosure of spaces.
- The existing trees and hedges will help to provide landscape character to the new development and support ecology within the site.
- The proximity of the conservation area should be reflected in the architecture.

Deliverability

Strata Homes has commissioned a range of technical assessments demonstrating that the development of the site is “achievable”.

The comprehensive array of available technical information for the site has informed an appraisal which demonstrates that the proposed scheme is viable, and hence deliverable.

Given the stage of the plan making process and proportionality of evidence at this stage standard industry assumptions have been utilised along with sensitivity testing around a number of varying scenarios. Nevertheless, this has demonstrated that the proposal will deliver a reasonable return for the landowners and an appropriate level of profit for the developers. The proposed scheme therefore fully accords with the Framework and can be considered deliverable.

The illustrative masterplan shows that the scheme can come forward in the short term and be delivered. The masterplan layers demonstrate the approach to delivering the scheme, including the drainage, utilities and green infrastructure and how it will reflect achieve the high design quality.

The proposed scheme can therefore be fully delivered within the Local Plan period.



Conclusion

The Whitley Lane site presents a significant opportunity to create new high quality homes in a sustainable location to address the City’s housing need. The site has the opportunity to create a sustainable living environment close to services, facilities and public transport routes.



This Advocacy Report has shown that the site at Whitley Lane provides a unique opportunity to create a high quality housing development. The proposed scheme can create new homes in a sustainable location close to existing services, facilities and employment opportunities. The site is also close to a range of public transport modes and the M1 Motorway. The scheme can support and enhance existing green networks.

The delivery of the Whitley Lane scheme will therefore generate significant benefits for Sheffield and the wider region through the creation of direct and indirect job opportunities, alongside environmental and community benefits, stimulating the local economy and adding value.

Strata Homes has a legal agreement with the landowner and controls the site. The site is therefore “available” and can be delivered in the short term in accordance with the Framework.

The site lies in the Green Belt. This report demonstrates the exceptional circumstances supporting the release of the site from the Green Belt due

to the urgent need to meet Sheffield’s housing need and ambitions for growth. The site is therefore “suitable” for a housing development in accordance with the Framework.

It has been shown that there are no major constraints to the development of the site and that the site can be delivered in the Local Plan period. The site is therefore “achievable” in accordance with the Framework.

The technical reports show how a mix of housing can be accommodated within the site, alongside connectivity, landscaping and drainage features. The development of the site, as shown within the indicative masterplan, is considered to be achievable.

It has therefore been shown that the site is available, suitable and achievable and therefore it is considered that the site is deliverable, in accordance with national planning policy and guidance. It is also attractive to the market, viable and is deliverable within the plan period.

Strata Homes

Sheffield Plan: Publication (Pre-Submission) Draft

Development Plan Representation

Whitley Lane, Ecclesfield

February 2023



01 Introduction

Introduction

- 1.1 Spawforths have been instructed by Strata Homes to submit representations to the Sheffield Plan Publication (Pre-Submission) Draft, for their site at Whitley Lane, Ecclesfield.
- 1.2 Strata Homes welcomes the opportunity to contribute to the emerging Local Plan for Sheffield and is keen to further the role of Sheffield within the Yorkshire and Humber Region as a whole.
- 1.3 Strata Homes has significant land interests in Sheffield, which can positively contribute towards the housing and economic growth agenda, providing a long term comprehensive approach to the sustainable growth of Sheffield.
- 1.4 Strata Homes would like to make comments on the following topics and sections of the Sheffield Local Plan (Pre-Submission) Draft:
 - General Comments
 - Vision, Aims, and Objectives
 - Policy SP1: Overall Growth Plan
 - Policy SP2: Spatial Strategy
 - Policy SA1: Central Sub-Area
 - Policy SA2: Northwest Sheffield Sub-Area
 - Policy SA3: Northeast Sheffield Sub-Area
 - Policy SA4: East Sheffield Sub-Area
 - Policy SA5: Southeast Sheffield Sub-Area
 - Policy SA6: South Sheffield Sub-Area
 - Policy SA7: Southwest Sheffield Sub-Area

- Policy SA8: Stocksbridge/Deepcar Sub-Area
- Policy SA9: Chapelton/High Green Sub-Area
- Policy H1: Scale and Supply of New Housing
- Policy ES1: Measures required to achieve Reduced Carbon Emissions in New Development
- Policy ES2: Renewable Energy Generation
- Policy ES3: Renewable Energy Networks and Shared Energy Schemes
- Policy ES4: Other Requirements for the Sustainable Design of Buildings
- Policy NC3: Provision of Affordable Housing
- Policy NC5: Creating Mixed Communities
- Policy NC8: Housing Space Standards
- Policy NC9: Housing Density
- Policy GS6: Biodiversity Net Gain
- Policy GS7: Trees, Woodlands and Hedgerows
- Policy DC1: The Community Infrastructure Levy (CIL) and Other Developer Contributions

- 1.5 In each case, observations are set out with reference to the provisions of the Framework and where necessary, amendments are suggested to ensure that the Local Plan is found sound.
- 1.6 Strata Homes welcomes the opportunity for further engagement and the opportunity to appear at Examination in Public.
- 1.7 We trust that you will confirm that these representations are duly made and will give due consideration to these comments.
- 1.8 Please do not hesitate to contact us to discuss any issues raised in this Representation further.

National Planning Policy context and Tests of Soundness

- 1.9 The Government's core objectives as established through the 2021 National Planning Policy Framework (the 2021 Framework) are sustainable development and growth. Paragraph 11 of the 2021 Framework stresses the need for Local Plans to meet the objectively assessed needs of an area. The 2021 Framework sets out to boost significantly the supply of homes and ensure that a sufficient amount and variety of land can come forward where it is needed. In terms of building a strong and competitive economy the 2021 Framework states that planning should help create the conditions in which businesses can invest, expand and adapt. The key focus throughout the 2021 Framework is to create the conditions for sustainable economic growth and deliver a wide choice of high quality homes and well-designed places.
- 1.10 In relation to Local Plan formulation, paragraphs 15 to 37 of the 2021 Framework state that Local Plans are the key to delivering sustainable development which reflect the vision and aspirations of the local community. The 2021 Framework indicates that Local Plans must be consistent with the Framework and should set out the opportunities for development and provide clear policies on what will and will not be permitted and where. Paragraph 22 is clear that the Strategic policies should look ahead over a minimum period of 15 year period, and where larger scale development such as new settlements or significant extensions to existing villages and towns form part of the areas strategy, then policies should look ahead over a period of at least 30 years.
- 1.11 In relation to the examination of Local Plans, paragraph 35 of the 2021 Framework sets out the tests of soundness and establishes that:

Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

- ***Positively prepared*** – providing a strategy which as a minimum, seeks to meet the area's objectively assessed needs¹; and is informed by agreements with other authorities, so that unmet needs from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.
- ***Justified*** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

¹ NPPF 2021, Footnote 21 – where this relates to housing, such needs should be assessed using a clear and justified method, as set out within paragraph 61 of this Framework

- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with policies in this Framework and other statements of national planning policy, where relevant.

1.12 This document therefore considers the content of the Regulation 19 Sheffield Local Plan on behalf of Strata Homes in the light of this planning policy context.

02 General Comments

General Comments

- 2.1 The Council's approach to the Local Plan is unsound.

Justification

- 2.1 Strata Homes is concerned that the evidence base which supports the Plan appears incomplete and in places lacks clarity. The Framework requires Local Plans to be based on a sound and up-to-date evidence base which identifies a development need and reflects the locational characteristics of the City. It is therefore difficult to comment in depth where there is little supporting information.
- 2.2 Furthermore, as is demonstrated in these representations not all reasonable alternatives have been considered in the preparation of the Local Plan. This could be due to the approach towards decision making on the Spatial Strategy, which does not reflect how Local Plans should be produced.
- 2.3 Local Plans should reflect evidence on employment and housing need and the appropriate Spatial Strategy should be devised that meets those needs. However, this Local Plan is based on a strategy of only meeting the employment and housing needs that can be met within the chosen Spatial Strategy option of the Council and therefore the full needs will not be met as that would take the Local Plan outside of the chosen strategy option.
- 2.4 Climate Change, Economy and Development Transitional Committee were presented Five Spatial Strategy Options on 13th January 2022, as follows:
- Option 1: An urban capacity approach – brownfield only.
 - Option 2: As Option 1 but with previously undeveloped land within the urban area also allocated where this is considered sustainable.
 - Option 3: As Option 1 & 2 plus sustainably located brownfield Green Belt sites.
 - Option 4: As Option 1, 2 & 3 plus release of sustainably located greenfield (previously undeveloped) sites in the Green Belt for development where there are site specific exceptional circumstances to justify altering the Green Belt boundary.

- Option 5: As Option 1, 2, 3 & 4 plus release of sufficient greenfield (previously undeveloped) sites in the Green Belt to meet the full housing need figure, as calculated using the Government's standard methodology.
- 2.5 Each option was accompanied by a maximum number of homes per year that could be delivered through that option. The debate that followed therefore focussed on the type of sites being identified first and meeting the housing needs second. Therefore, Members could not, and did not, make an effective decision on satisfying housing needs through the information presented.
 - 2.6 This approach to decision making is unsound as it is not evidence-led on housing need and does not meet the Government's standard methodology on housing need, which is 2,973 dwellings per annum and is the minimum starting point in determining the number of homes needed in an area.
 - 2.7 Furthermore, the evidence showed that to meet the housing need greenfield Green Belt sites should be released. However, Members focussed on the types of sites and housing only, devised that the Council would not meet its housing need and chose Option 3.
 - 2.8 Option 3 was put forward as it would include two brownfield Green Belt sites. These are mentioned in the Transitional Committee report at para 1.6.12, which states that "there are two large brownfield sites in the Green Belt that adjoin the existing urban area. We estimate that, in total, these sites could have capacity for up to 1,100-1,200 homes but they could also be suitable for employment use. Adding these sites to the supply could enable a housing requirement of up to 2,305 per year (see Appendix)." The two brownfield sites are again mentioned in the Options in the appendix.
 - 2.9 The Cooperate Executive Report of 19th January 2022 goes further in the accompanying Equality Impact Assessment by highlighting the two sites, which are at Norton and Chapeltown. Members therefore took the decision on the preferred Spatial Option in full cognisance that these two sites would be identified in the Plan.
 - 2.10 Ultimately only a portion of the former Norton aerodrome was released from the Green Belt for 280 new homes and fewer homes have been identified than originally suggested through the committee reports, which shows Option 3 could support the potential for circa 2,305 new homes per annum. However, the draft Local Plan is proposing 2,090 dwellings per year, which is below the suggested level for Option 3. The final proposed Plan therefore does not reflect the information that supported Option 3, is providing fewer homes and also does not meet the standard methodology.
 - 2.11 The evidence base shows that the Council has not assessed all sites and therefore Members could not understand what sites would be identified within each option. The information presented as part of the consideration of **Spatial Options is ill informed and unsound.**
 - 2.12 Subsequently, only sites that fit within Spatial Options 3, as perceived by the Council, have been assessed and considered. The consideration of reasonable alternatives has therefore not occurred. **The approach towards the Plan is therefore unsound.**

- 2.13 Paragraph 3.8 states that the housing growth figures reflect the capacity of the existing urban areas and the restrictions imposed by the Green Belt. However, that is not strictly true as the committee reports show that, in accordance with the Framework, the Council could amend the Green Belt to accommodate the housing requirement as exceptional circumstances would have been demonstrated.
- 2.14 The Spatial Strategy on focussing on types of sites has therefore created an unsustainable short term Plan, which is not meeting the identified needs. This view is reinforced through the introductory text to Policy H1, which states in paragraph 5.3 that “sufficient deliverable sites have been allocated to provide a supply for the first five years of the plan period after adoption” and that “a further supply of developable sites will come forward on other sites”. Paragraph 5.4 states that there is insufficient evidence to demonstrate whether some of the developable supply is deliverable and paragraph 5.6 highlights that public intervention will be needed to enable some of the sites to come forward, due to constraints on site and multiple ownerships. We have reviewed the housing supply position and consider the Local Plan is deficient in its provision, which will be explained in response to Policies SP1 and H1.
- 2.15 The Council has therefore clearly chosen a Spatial Option, and identified sites to suit, and not meet the identified housing need. **Strata Homes therefore consider that the basis of the Local Plan is unsound.**

Viability Assessment

- 2.16 Strata Homes have undertaken a review of the HDH Planning and Development Whole Plan Viability Assessment (September 2022), which forms part of the evidence base. The difficulties in undertaking whole district Economic Viability Studies are not underestimated. However, it is important that a level of robustness and rigour of testing of the evidence base is undertaken due to the fundamental importance of this document in underpinning the policy direction for the whole plan period.
- 2.17 Strata Homes note that due to the nature of property market in terms of its cyclical nature and the turbulence of build costs and revenues that any Viability Assessment can only be a point in time and will quickly become out of date. It is therefore clear that the proposed policies need to include more flexibility alongside ambitious demands to enable delivery.
- 2.18 The PPG states that the approach to viability should be: “proportionate, simple, transparent and publicly available”. Further justification is required for several inputs and the raw data on revenues for example should be made available for scrutiny. Strata Homes is concerned that the Appraisal assumptions and evidence base for many inputs are out of date. This should be reviewed and updated, but also highlights the reason for greater flexibility.
- 2.19 Strata Homes would like to highlight issues with some of the assumptions within the Viability Appraisal, for example the costs for abnormals where only an allowance of 5% of the BCIS costs is included and that “abnormal costs will be reflected in land value. Those sites that are less expensive to develop will command a premium price over and above those that have exceptional or abnormal costs”.

- 2.20 As the Council's focus in the Local Plan is on urban brownfield sites appropriate development costs should be incorporated into the Viability Appraisal. The Local Plan already highlights that the deliverability and viability of a number of sites is unknown.
- 2.21 Strata Homes therefore considers that the Local Plan and its evidence base should be updated.
- 2.22 Strata Homes therefore reserve the right to comment further on the Local Plan and policies when evidence and information is provided.
- 2.23 **As currently drafted, Strata Homes consider the Local Plan is unsound.**

Proposed Change

- 2.24 To overcome the objection and address soundness matters, the following changes are proposed:
- Update the evidence, including the Viability Appraisal.
 - Reflect the evidence base within the Local Plan.
 - Consider all reasonable alternatives, including Green Belt sites.
 - Allocate the site at Whitley Lane, Ecclesfield for housing use.

03 Vision, Aims, and Objectives

Vision, Aims, and Objectives

- 3.1 The Vision and Objectives do not reflect the economic growth agenda. Furthermore, there is inconsistency between the Spatial Strategy, identification of sites and the Vision and Objectives. The Plan is therefore unsound.

Justification

- 3.2 The Vision is relatively positive. However, there is no mention of housing growth. There are references to “thriving neighbourhoods and communities” and providing “good quality housing offer meeting the needs of different household types and sizes. However, this is particularly vague and does not in turn foster the conditions for “boosting the supply of housing” in accordance with the Framework.

- 3.3 Strata Homes’ main concern is with the drafting and derivation of the Plan. The “Objectives for thriving neighbourhoods and communities” in paragraph 2.12 states:

To create a housing market that works for everyone and which provides quality, choice and affordability.

To ensure Sheffield has an adequate supply of residential development land so the city can meet its requirement for new housing.

- 3.4 Strata Homes considers that the Plan does not reflect this Objective in under providing housing land compared to the identified housing need and not having the range, choice and location of housing sites to cater for creating a healthy housing market.

- 3.5 Strata Homes considers the strategic approach of the Plan is flawed. The sites are available and have been submitted to the Council to deliver an ambitious Plan for an ambitious City. However, the Plan does not reflect the Vision or Objectives as internally inconsistent.

- 3.6 The Sheffield Local Plan is unsound as drafted.

Proposed Change

3.7 To overcome the objection and address soundness matters, the following changes are proposed:

- Update the Local Plan and identify further employment sites.
- Allocate the site at Whitley Lane, Ecclesfield for housing use.

04 Policy SP1

Policy SP1: Overall Growth Plan

- 4.1 The Local Plan is not addressing the identified employment requirement and does not reflect the evidence base, national policy and guidance and is therefore unsound.

Justification

- 4.2 Policy SP1 states that the Local Plan will deliver 35,530 new homes by 2039, which is 2,090 new homes per year from 2022 to 2039.
- 4.3 However, this will not meet the identified housing need, which in accordance with the Government's standard methodology is 2,973 dwellings per annum, and is therefore not in accordance with the Framework.
- 4.4 The Framework describes the purpose of the planning system to contribute to the achievement of sustainable development. There are three overarching objectives which are central to the achievement of sustainable development: economic, social and environmental. The economic objective is to '*help build a strong, responsive and competitive economy by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure*'. [paragraph 8, Spawforths emphasis]. Plans are required to be prepared positively and in a way that is aspirational but deliverable, and ensure that strategic policies look ahead over a minimum of 15 years from adoption in order to anticipate and respond to long term requirements and opportunities such as those arising from major improvements in infrastructure. Strategic policies include the scale and quality of development and making sufficient provision for housing (including affordable housing), employment, retail, leisure and other commercial development alongside infrastructure, and community facilities.
- 4.5 The Framework is clear that to be considered positively prepared and therefore 'sound' the plan must, as a minimum, meet the Plans objectively assessed needs [NPPF, Paragraph 35].
- 4.6 The Government are committed to boosting the supply of homes and ensuring that a sufficient amount and variety of land can come forward where it is needed, and that the needs of groups with specific housing requirements are addressed. [NPPF, paragraph 60].

- 4.7 The Plan is also expected to create conditions in which businesses can invest, expand and adapt, which requires a clear economic vision and strategy which positively and proactively encourages sustainable economic growth. There should be significant weight on the need to support economic growth and productivity. Plans are required to be flexible enough to accommodate needs that have not been anticipated within the plan. [NPPF, Paragraphs 81 and 82].
- 4.8 The Framework states in paragraph 61 that:
- To determine the minimum number of homes needed, 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 which also reflects current and future demographic trends and market signals*
- 4.9 The Planning Practice Guidance (PPG) states that it is expected that the standard method be followed for assessing housing need. The PPG states that the standard method is not mandatory but any other approach will be scrutinised more closely at Examination and there will need to be exceptional circumstances.
- 4.10 As stated within General Comments, Strata Homes does not consider that exceptional circumstances have been evidenced for an alternative approach. It is clear from the committee reports that the evidence presented showed that greenfield Green Belt sites were required to meet the identified needs, and this would have delivered the desired housing and economic growth aspirations for the Council.
- 4.11 However, the debate focussed on the type of sites and not the evidence or housing need. This does not constitute exceptional circumstances for diverting from the standard methodology for housing as the starting point, which does not allow for affordability, economic growth or the 35% uplift for the top 20 cities and urban centres.
- 4.12 The Committee Report clearly identifies for choosing either Option 4 or Option 5, which are:
- Increase the viability of key strategic infrastructure, thereby enabling it to be delivered, in particular new passenger railway lines/stations;
 - Support the expansion of strategic employment areas;
 - Provide land to meet specialist housing needs in a part of the city where there is no other land available.
- 4.13 The benefits continue highlighting providing opportunities to meet a wider range of market areas; delivering a better mix of house types overall; viability is less of a problem on greenfield sites; enable more affordable homes; support investment in new rail infrastructure such as the Barrow Hill line and Upper Don Valley; and the amount of housing land would be closer to the housing need figure calculated by Government.
- 4.14 Members therefore without appropriate evidence or analysis of reasonable alternatives arbitrarily lowered the housing requirement.
- 4.15 The Icen report in July 2021 which explored Housing, Economic Growth and Demographic Modelling clearly shows that the housing need and therefore the housing requirement should be

higher. The Icen Report identified the standard methodology figure of 2,923 dwellings per annum. Linking with the economic growth aspirations shows a housing requirement of 2,323 dwellings per annum. This again is higher than the housing requirement in the Plan of 2,090 dwellings per annum. The Icen report only suggests reducing the housing requirement if economic activity rates could be increased in the population. However, little evidence is provided on this.

- 4.16 Therefore, all the indications are that without evidence the housing need within Sheffield has been artificially reduced.
- 4.17 Strata Homes also notes that the Council has identified Broad Locations within the Urban Area for future growth. However, as stated in the supporting text to Policy H1 “there is not yet sufficient certainty to allocate all the land that is potentially suitable for housing in these areas”. These areas require relocation of uses, land assembly and new infrastructure. These sites are long term and cannot be relied upon. Strata Homes considers appropriate housing sites should be identified to deliver the requisite number of homes for the full Plan period. Furthermore, the equivalent long term sites should be identified in the Green Belt. In accordance with the Framework safeguarded land for longer term development needs should be identified and which can be released as a resource to ensure the housing needs of the City are met.
- 4.18 **Strata Homes is concerned that the this Local Plan does not seek to meet its identified needs with regards to housing and employment and has not been prepared positively having regard to the economic growth aspirations of the City Region, and beyond.**

Economic Growth

- 4.19 Sheffield forms an important part of the Northern Powerhouse and it is the driving force in the Sheffield City Region. The South Yorkshire authorities form a key economic area between the rest of Yorkshire and the North of England and the Midlands. Sheffield is located on the M1/M18 as key routes to the north, south and east and the Midland Mainline railway.
- 4.20 The Council is seeking to create 219.3 hectares of new employment land over the Plan period, which will create economic investment and additional jobs.
- 4.21 The Sheffield City Region Strategic Economic Plan 2021-2041 focusses on the growth of Sheffield, Rotherham, Barnsley and Doncaster. The SEP highlights that having available “good quality, well connected and attractive land for new homes and jobs is a major competitive advantage for the SCR”. The SEP therefore states that to deliver the growth aspirations “we must bring forward a combination of mixed-use developments, large strategic opportunities and strategic regeneration in key growth areas”. The SEP continues stating that “we need to focus on a small number of big opportunities – sites and developments that have the scale to benefit the wider city region”.
- 4.22 The SEP seeks to target growth in GVA of an extra £7.6 billion and an extra 33,000 higher level jobs. Despite this focus the plan still acknowledges that the strongest employment growth forecast is within lower productivity sectors, such as residential care, food and logistics.

- 4.23 It is therefore evident that the emerging Sheffield Local Plan is not in accordance with the aims and objectives of the Strategic Economic Plan for the Sheffield City Region and could undermine its delivery.

Housing Need

- 4.24 The Framework is clear that to be considered positively prepared and therefore 'sound', the Plan must, as a minimum, meet the Plan Area's objectively assessed needs.
- 4.25 The PPG is clear that the standard method identifies a minimum annual housing need figure and that it does not produce a housing requirement figure. It is also clear that the affordability adjustment within the standard methodology is just to ensure that the minimum housing needs starts to address affordability of homes. It therefore does not fully address affordability issues.
- 4.26 The PPG goes on to identify the circumstances when it is appropriate to plan for a higher housing need figure than the standard methodology identifies. *'The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides the minimum starting point in determining the number of homes needed in an area...it does not predict the impact of future government policies, changing economic circumstances or other factors that might have an impact on demographic behaviour. Therefore there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicate.'*
- 4.27 *This will need to be assessed prior to and separate from, considering how much of the overall need can be accommodated. Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:*
- 4.28 *Growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth*
- 4.29 Strategic infrastructure improvements that are likely to drive an increase in the homes needed locally;
- 4.30 *An authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground.*
- 4.31 *There may, occasionally be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently produced SHMA) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need that the standard model suggests'. Paragraph 010 Reference ID: 2a-010-20190220.*
- 4.32 The Council need to recognise that the development of new housing will bring forward additional economic benefits to the area. The relationship between economic performance in an area and housing is complex, but having the right quantity, quality and balance of housing in an area is necessary for economic growth. The development of new housing can therefore support local economic growth, both through direct job creation through the construction phase of the scheme, but also through the increased population which will create sustainable local jobs from the

increased demand for goods and services. This provides an important sustainable development opportunity for Sheffield.

- 4.33 Importantly the HBF released in July 2018 its report on “the economic footprint of house building in England and Wales”, which shows that house building in England and Wales is now worth £38bn a year and supports nearly 700,000 jobs. House building activity contributes economically in different ways including providing jobs, tax revenues and contributing funding for local infrastructure and communities. House building supports the economic in a wider sense through being drive for economic growth; delivering jobs and economic value; supporting labour market mobility; creating skills and employability; enhancing place competitiveness; creating quality of place and reusing brownfield land.
- 4.34 An important conclusion of the report and the wider economic benefits is that a healthy, well-functioning labour market requires a good supply of housing that is affordable for local people to enable them to move jobs freely and match up skills supply with employer demand. A dysfunctional housing market can inhibit labour market mobility, in turn stifling economic growth.
- 4.35 Strata Homes maintain that there are clear circumstances in Sheffield which demonstrate that housing need in Sheffield is higher than the figure that results from the use of the standard method. These include:
- The growth strategy
 - Past delivery rates
 - Affordable housing need
- 4.36 The standard methodology is based on 2014 SNPP projections. Although, the Government has accepted that there are flaws in the approach to the standard method, it is still the most appropriate approach at this time to boost the supply of homes and ensure the delivery of 300,000 homes per annum. The Government has committed to levelling up the UK economy, and to achieving a better distribution of homes where homes are identified in more high-demand areas and in emerging demand areas across the country (such as the Northern Powerhouse). This will help avoid issues where unaffordable areas in high demand are planning for low numbers of homes due to past trends of suppressed household formation.
- 4.37 Strata Homes appreciate that the Government has recently consulted on proposed changes to the Framework, which reinforces the need to an evidence base, the uplift for the top 20 most populated centres, still highlights meeting the housing need for the area and that you can still amend Green Belt boundaries to meet the need and growth ambitions. The proposed changes to the Framework are not Government policy at present and therefore any other changes to the Framework do not apply to this Local Plan Review.

Housing Requirement – Economic Growth

- 4.38 Sheffield is an integral part of the Sheffield City Region and the ambitious growth aspirations. Therefore, as highlighted earlier to achieve the aspired growth that the City Region is seeking to achieve, and is securing Government funding for, the level of new housing needs to reflect the ambitions of the Strategic Economic Plan.

- 4.39 Furthermore, the Sheffield City Region Integrated Infrastructure Plan states:
- 4.40 *A quality housing offer has a crucial role to play in the future economic growth of the City Region. It is essential to attracting and retaining a skills base that supports inward investment as well as meeting existing and future community needs and retention of Sheffield City Region (SCR) talent.*
- 4.41 *It has been identified that between 70,000 and 100,000 additional homes are needed in SCR to support the proposed economic growth over the next 10 years. These will have the dual benefit of providing accommodation that underpins the proposed increase in employment (70,000 jobs), as well as the wider economic benefits that housing investment brings.*
- 4.42 *Housing forms a key component of the SCR construction sector. The CBI [CBI (2012) Bridging the Gap – Backing the Construction Sector to Create Jobs] estimates that every £1 spent on construction projects yields a total of £2.84 expenditure in the wider economy. It is estimated that approximately £2,000 per annum per household spending on local convenience goods, and approximately £2,700 per annum per household spending on local comparison goods can be attributed to residents in new housing. (Over the lifetime of the SEP, a similar amount would generate at least £400 million for the SCR economy). The GVA benefits that can be attributable to new housing are as follows:*
- Construction: material, labour professional skills and other services for construction, compounded by supply chain benefits
 - Household Maintenance Spend: Spend on products and services associated with each new household
 - Direct Job Uptake: GVA resulting from new productive workers moving into SCR, compounded by their spend on SCR products and services
 - Indirect (Chain) Benefits: As SCR residents move up the housing chain, this creates new available space in different sub-markets.
 - Preventing Displacement: The type and location of construction may be important in mitigating losses of households from the city region that might otherwise occur.
- 4.43 Within this context it is important that the Council plans for new jobs and associated new homes in accordance with the Strategic Economic Plan growth aspirations.
- 4.44 As highlighted earlier, the SEP established a target to deliver 33,000 new high skilled jobs. The SEP has an ambition for the economy to work for everyone and will be a net contributor to the national economy, retain talent and attract new investors to locate in the region. It recognises the relationship between housing and economic growth, with a key commitment to make homes and land available for families and businesses to locate and grow. Within Sheffield there is an objective of creating an inclusive wellbeing economy; increasing 'good' jobs; supporting growth of productive and competitive business; recognise the importance of place; consolidate Sheffield as a Magnet City; Transformed transport connectivity, linking people to jobs; housing that provides quality, choice and affordability across the city.
- 4.45 The SEP is clear that there is a need to maintain housing growth, alongside investing in the quality of existing stock. The SEP continues to recognise the significant potential for the Sheffield

economy and the need to unlock that potential. This SEP does not set a specific job target for overall jobs growth, although as indicated above the ELR notes that evidence to support the SEP indicated a target of 1% jobs growth across the SCR, which the ELR notes was a reasonable forecast for Sheffield.

- 4.46 In recognition of this ambition for Sheffield within the SEP, and in order to support the vision set out within the emerging Local Plan that Sheffield will be playing a nationally significant economic role at the heart of the region, there is a need to ensure that the level of housing growth planned for, aligns with the economic growth. It is critical that this supports jobs growth in terms of both the quantum of housing offered but also in terms of the choice of size, type, tenure and location, reflecting the diversity of the economy, the forecast growth in lower productivity sectors, and the targets to increase higher skilled jobs.
- 4.47 As highlighted earlier, the Icen Report does not appropriately show the implications on economic growth for the proposed housing requirement of 2,090 homes per annum. The report suggests that the housing requirement could be lowered if economic activity rates were increased, however there is no modelling or evidence to support such assertions.
- 4.48 Therefore there is a clear need to model the implications of aspirational yet deliverable jobs growth on housing growth, acknowledging the sectors forecast to grow as well as those being targeted.
- 4.49 Strata Homes reserve the right to comment further following the preparation of any further evidence by the council. Strata Homes consider on the basis of the SCR ambition and Sheffield strengths and opportunities that **the housing requirement needs to be uplifted to reflect the aspirations for jobs growth.**
- 4.50 Strata Homes note in the earlier Issues and Options Paper that the SA has assessed an option for housing growth that was consistent with the Aspirational Job growth scenario by Edge, for circa 2,660 dwellings per annum. This option is considered to perform as well in the sustainability appraisal as the option pursued within the Issues and Options document and better than the proposed option in terms of Aim 1: A vibrant and competitive economy with good job opportunities available to the whole economy.

Housing Requirement – Housing Delivery

- 4.51 As stated above PPG indicates that consideration can be given to delivery rates, for the last five years net completions have been higher than the proposed local plan target in all but two years. Net completions amount to 11,811 dwellings, with annual completions as follows:

2016/17	2017/18	2018/19	2019/20	2020/21
2,458	2,386	2,000	3,101	1,866

- 4.52 The year 2020/21 is largely affected by Covid-19 Pandemic and should therefore be considered an outlier. Therefore, this demonstrates that there is sufficient demand to support a requirement above the standard methodology of 2,923 dwellings per annum, and the plan requirement of 2,090 dwellings per annum. The annual average over the four years 2016/17 to 2019/20 is 2,486 dwellings. Furthermore, the Council acknowledged within the earlier consultations, including the Issues and Options in 2020 that much of the completions are as a result of the delivery of student housing, and that there is still a need to deliver family housing. Page 26 of the Issues and Options document notes that every year “people move from Sheffield to other districts in the Sheffield City Region. In particular there is a trend for people wanted suitable family housing to move to Rotherham, North East Derbyshire and Barnsley, demonstrating the need to ensure that a full range of house types, sizes and tenures are provided in order to deliver a balanced housing market, support economic growth and foster more sustainable travel patterns”.
- 4.53 The Housing Technical Paper that supported the Issues and Options consultation states in paragraph 2.20 the annual average over the last six years of 2,230 homes per annum has been at a level around that which will be needed to meet the plan requirement. It will therefore be important that the Sheffield Plan identifies enough deliverable land.
- 4.54 There is therefore evidence of both delivery at a higher rate and recently published evidence that indicates a higher need for housing. As stated above, PPG is clear that this evidence should be taken into account when determining the housing requirement.
- 4.55 Strata Homes consider further evidence is required to demonstrate whether the affordable housing needs of Sheffield can be met based on a target of 2,090 dwellings per annum. Whilst it is accepted that the calculation of local housing need figure includes an adjustment for affordability, however there are inherent issues with reliance on the workplace –based median house price to median earnings ratio and its ability to reflect affordability issues on the ground.
- 4.56 The joint SHMA considers that the current need for affordable housing amounts to 902 dwellings per annum. The current need for affordable housing, 902 affordable units, represents 43% of the Local Plan requirement for housing. The emerging Local Plan proposes the following requirement for affordable housing: 30% in high value areas, 10% in most other areas. Critically the Plan indicates that there are areas including the city centre where it is not viable to provide any affordable housing. This is where the Plan seeks to focus a significant proportion of the housing requirement within each of the three spatial options.
- 4.57 The affordable completions for the last six years (based on Live Table 1011) are as follows:

2016/17	2017/18	2018/19	2019/20	2020/21	2021/22
327	99	165	129	207	131

- 4.58 It is evident from this information that the total affordable completions fall below the identified affordable need, even when total completions are higher than the proposed Local Plan requirement of 2,090 per annum. Therefore, in the context of the level of affordable need, viability issues, and a likely upper requirement for 30% affordable housing, Strata Homes are concerned that a target of 2,090 dwellings per annum will not deliver sufficient number and range of affordable homes to meet the identified needs within the City. In order to deliver 902 affordable dwellings per year, a requirement of at least 3,000 dwellings per annum would be required. This assuming the achievement of an average of 30% affordable housing, which represents two times that of the highest achieved over the last three years of monitoring, and given viability issues within parts of the city would still require significant public sector investment. Importantly the SHMA notes a worsening picture of need in Sheffield for a variety of reasons including an insufficient supply of new affordable housing to meet previously identified requirements. It considers that the Plan must increase the supply of affordable housing in a sustainable and long term way. An uplift to the overall requirement will serve to support the delivery of affordable housing in Sheffield.
- 4.59 Strata Homes consider that there is sufficient evidence pointing to the need for further uplift in the Local Plan housing requirement, based on the need to support the local plans economic ambitions, evidence of delivery and the need to ensure sufficient delivery of affordable housing.
- 4.60 Strata Homes consider that the policy in its current form is not justified and is not consistent with the Framework the Plan in its present form could fail to deliver sustainable development in accordance with policies in the Framework. In these circumstances, we do not consider the Sheffield Local Plan in its current form to be sound.
- 4.61 However, Strata Homes consider that with a higher requirement, of at least 3,000 homes as a minimum to reflect current delivery, meet the economic growth aspirations, and to ensure that the needs for affordable homes can be met. This reflects the standard methodology.

Assessment of Housing Supply

- 4.62 A brief review of a number of the proposed allocation sites has been undertaken and is attached at Appendix 1. An assessment has been undertaken of whether they will be likely to deliver housing units in the first five years of the local plan being adopted and whether they are developable over the plan period.
- 4.63 Paragraph 74 of the Framework sets out that: *“Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years worth of housing against their housing requirement set out in adopted strategic policies.”*
- 4.64 The Framework provides a definition of deliverable: *“To be considered deliverable, sites for housing should be available now, off a suitable location for development now and be achievable with a realistic prospect that housing will be delivered on the site within five years...”*
- 4.65 The Framework provides a definition of developable: *“Sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.”*

- 4.66 This analysis has had regard to the site assessments contained within the Site Selection Methodology (January 2023), the Five Year Land Supply monitoring report and also included a desktop review of using the planning portal, land registry and google earth to ascertain whether there were any ownership constraints, existing businesses or other uses currently occupying the sites which may preclude or delay delivery onsite. Findings of this analysis are noted in the comments section in the table below.
- 4.67 The 5 Year Housing Land Supply Monitoring Report (December, 2022) does not provide a list of specific sites which contribute to the Five Year Land supply and therefore it is impossible to analyse those sites to ensure they are deliverable. We have instead reviewed a sample of the proposed allocation sites to assess whether they are deliverable and developable.
- 4.68 Table 4 of the 5 Year Housing Land Supply Monitoring Report (December 2022) states that the current 5-year deliverable supply is 3.63 years. The Authority Monitoring Report (January 2023) notes at paragraph 5.13 that the: *"...current deliverable land supply is 3.63 years. This covers the period 2022/23 to 2026/27 and has been calculated using the Government's local housing need figure (currently 3,018 additional homes per year)."* The same paragraph goes on to state that: *"Taking account of the proposed housing requirement in the Publication Draft Local Plan the current deliverable supply would be 5.37 years in advance of the allocations being adopted in the plan."* The proposed housing target is 2,090 homes per annum from 2022 to 2039 and does not take account of the 35% uplift for cities.
- 4.69 The analysis covered 36 sites with a total capacity of 9,712 units. The total available supply according to the Sheffield Housing and Economic Land Availability Assessment (December 2022) is 35,578 units. Therefore this assessment covers approximately 27% of all of the housing supply across the district. It is our belief that if our analysis were to be extended to cover the entirety of the supply similar conclusions would emerge, namely that many of the proposed allocations have significant deliverability concerns and therefore are unlikely to deliver the required housing to meet the needs of the district.
- 4.70 Of the 36 sites our analysis demonstrates that only 8 are likely to deliver housing units within the first five years of the plan being adopted. The output from these 8 sites has been assessed utilising realistic rates of delivery and lead in times. Where land is within multiple ownerships and requires assembly we have allowed 1 year. We have allowed 2 years for planning applications to be approved. We have assumed a lead in time of six months from planning permission to the first units being delivered. Where sites are large (i.e. over 500 units) and do not yet have planning permission it is unlikely that they will deliver housing within the first five years of the plan. On sites which are likely to be comprised of estate housing rather than flats we have assumed delivery of 30 dwellings per annum per outlet.
- 4.71 Our analysis has shown that only approximately 759 units are deliverable within the first five years of the plan or 7.8% of the total capacity of the 36 housing allocations (9,712 units) which were analysed.
- 4.72 Regarding the remaining 28 sites, an assessment of whether they are developable has been undertaken. Of the remaining 28 allocation sites only 5 have been shown to be developable. Therefore our assessment shows that 23 of the sites do not have a reasonable prospect of delivering housing units within the plan period.

- 4.73 The 23 sites which have been identified as not developable include a sites which are currently occupied by other uses, such as a Mecca Bingo Hall, a B & Q store, a Decathlon store and a Wickes store. They also include areas of land which are covered by multiple ownerships with existing businesses operating from them. No evidence has been provided that there is a reasonable prospect that these sites will become available for development.
- 4.74 The 23 sites which have been identified as undevelopable include capacity for 6,381 dwellings. There is very little prospect of these sites coming forward during the plan period and therefore alternative sites will need to be found to accommodate the required housing need for the district.
- 4.75 Therefore, there is no five year housing land supply and there is no evidence of a supply of housing for the Plan period.
- 4.76 Furthermore, as stated earlier the introduction to Section 5: Housing Policies acknowledges the difficulties with the housing supply over the Plan period, stating that “there is not yet sufficient evidence to show it is deliverable before 2029” and that “public intervention will be needed to enable much of the former employment land to transition to sustainable, desirable residential areas” and that “many of the potential development sites have multiple owners” and there is a need for financial support from the Government.

Windfall Allowance

- 4.77 Furthermore, it appears the Council are seeking to rely on a windfall allowance of circa 200 dwellings per year, which is 1,000 homes over the first five years of the Plan. This is evidenced in the Housing Land Supply report in paragraph 3.17. However, this shows completions dropping from 2018/19 onwards, which shows from 2018-2022 the average completions being 144 dwellings per annum. Furthermore, the Council is seeking to apply the windfall allowance from Year 1 and therefore there is a risk of double counting.
- 4.78 It is important in relation to windfalls that there is sufficient evidence to demonstrate that this will continue. Sheffield does not currently have an up to date Plan and therefore there are significant windfalls. Strata Homes would expect that the level of windfalls would reduce with the allocation of sites within a recently adopted Plan. Strata Homes suggest the windfall allowance be reduced accordingly and sufficient allocations be identified.

Exceptional Circumstances

- 4.79 Therefore, there is a significant shortfall in the proposed housing provision and the Council accepts the need to utilise the Green Belt for housing purposes by allocating the Norton Aerodrome site. Strata Homes consider further sites should be identified to address the shortfall and meet the need and demand for homes.
- 4.80 Strata Homes is concerned that the Council is effectively deferring the issue to a future Local Plan Review. This is not in the spirit of the Framework, where it is clear that there are exceptional circumstances to justify the release of green belt, attributed to the scale of need for both housing and employment land. The approach to Green Belt release being taken within the emerging Local Plan is very short sighted and effectively seeks to defer the decision on Green Belt release until a

future plan review. It is accepted that the Framework requires authorities to examine all other 'reasonable' options for meeting its identified needs for development before concluding exceptional circumstances exist to justify changes to the Green Belt. However, this has already occurred through the release of the Norton Aerodrome site.

- 4.81 The Framework is clear that strategic policies should set out an overall strategy for the pattern and scale of development and makes sufficient provision for housing and that strategic policies should look ahead over a minimum 15 years from adoption to anticipate and respond to long term requirements and opportunities. It is not reasonable to adopt an approach that does not identify sufficient land to meet the needs within the Plan.
- 4.82 The Green Belt has not been reviewed since the late 1960's. The Local Plan presents an opportunity to review the Green Belt and ensure that the revised boundary has permanence in the long term to endure beyond the Plan period. Paragraph 136 of the Framework considers that Green Belt Boundaries can change in "exceptional circumstances". Such circumstances exist in Sheffield through the significant need to provide housing and employment land within Sheffield to meet identified needs.
- 4.83 The Framework is clear that when drawing up or reviewing Green Belt boundaries, that the need to promote sustainable patterns of development should be taken into account. Where it is necessary to release Green Belt land for development, plans are required to give first consideration to land which has been previously-developed and or is well-served by public transport.
- 4.84 Strata Homes consider that the release of Green Belt sites should prioritise sites that benefit from good public transport connections consistent with the Framework and the overall aims of the Plan. Strata Homes consider that the strategy for Green Belt release should therefore have regard to sites that could facilitate the delivery of public transport improvements, the identified Mass Transit Corridors and public transport connections available to enable residents to access employment alongside other services and facilities.
- 4.85 Strata Homes have assessed their site at Whitley Lane, Ecclesfield in relation to the Green Belt, which is summarised in the Advocacy Report attached at Appendix 2, and consider that the allocation of the site for housing will not undermine the integrity of the Green Belt, as follows:

To check unrestricted sprawl

- 4.86 The site off Whitley Lane is relatively contained by the surrounding landform, vegetation and existing built form and will not lead to unrestricted sprawl or encroachment. The site is located on the edge of Ecclesfield with residential development located to the south, west and to the North.

To prevent neighbouring towns from merging

- 4.87 The contained nature of the site, including topography and boundary treatment mean that the site would not lead to the coalescence of towns.

To assist in safeguarding the countryside from encroachment

- 4.88 The site is relatively contained by topography, and existing boundary treatment. The perception of any encroachment into the countryside is minimized by the level of urban influence at this location and the relative containment of the site.

To preserve the setting of historic towns

- 4.89 The site will have no impact on the setting of a historic town.

To assist in urban regeneration

- 4.90 The presence of existing residential development on Chapeltown Road, immediately to the north of Whitley Lane limit the perception of openness in the area. The impact of development at Whitley Lane on the openness of the Green Belt is further limited by the areas position within the wider landscape and existing vegetation.



- 4.91 The current location of the Green Belt boundary at this location is not robust and does not accord with the Framework where boundaries should be clearly defined using readily recognisable features to ensure permanency. In this area the Green Belt boundary is drawn tightly along the rear garden boundaries of properties along Chapeltown Road/Whitley Croft.
- 4.92 The proposed new boundary would be defined by LWS Hunshelf Woods to the north and North West, Whitley Lane to the South, and existing development and small section of hedgerow to the west. This boundary would accord with the Framework and ensure that the Green Belt is clearly

defined using readily recognisable features to ensure permanency reinforcing the urban context whilst providing a robust boundary for the future.

- 4.93** All the boundaries have the potential to be further reinforced within the site through additional planting including tree planting to ensure an effective transition between the development and the countryside beyond. There is also the potential to enhance existing connections between the urban area and wider countryside, enhancing the Green Link.
- 4.94** The site's impact on the openness of the Green Belt will be limited as it is contained within its landscape, in an area which is influenced by existing residential development and commercial development. It can be therefore demonstrated that the site has a limited role to play when considered against the five purposes of the Green Belt, and the redevelopment of the site will not undermine the integrity of the Green Belt.
- 4.95** In summary, the allocation of this site for subsequent residential development will:
- Strengthen the Green Belt boundary in this location by 'rounding off' the urban area with the strong defensible boundary;
 - It will neither encroach in to the open countryside, affect openness nor set a precedence for further incursions in the open countryside;
 - Its development would not have any significant impact on the openness of the wider Green Belt due to its relative containment.
- 4.96** In terms of the Framework and Green Belt purposes, the site does not achieve any of the five purposes for including land in the Green Belt and its development would create a logical rounding off of the urban area. This means that:
- The site at present does not check unrestricted sprawl of large built-up areas,
 - It does not prevent neighbouring towns from merging
 - It does not assist in safeguarding the countryside from encroachment.
 - The current site does not preserve the setting or special character of a historic town
 - The site does not assist in urban regeneration
- 4.97** In terms of the use of land in the Green Belt, the site does not fulfil any of the objectives set out in the Framework.
- 4.98** The Framework states that Green Belt boundaries should be drawn so as not to include land which it is unnecessary to keep permanently open.
- 4.99** The Whitley Lane site does not stop the coalescence of neighbouring towns, encroach on the countryside nor affect the setting and special character of an historic town and as such serves no Green Belt purpose. Therefore, a change in the Green Belt boundary, particularly given the housing need, would be appropriate and would not undermine its principle purpose.

- 4.100 The new Green Belt boundary, as identified in the Advocacy Report, has been designed to respect both the topography of the site and will define and enclose the urban area with a strong and defensible boundary that will be defensible over the coming plan period and beyond.
- 4.101 It is clear from the evidence above and the consideration of the site in the context of national and local policy, the removal of this site from the Green Belt at this time would be appropriate and would not undermine any of the key objectives and aims of Green Belt policy.

Regeneration Imperative

- 4.102 The Whitley Lane site presents a significant opportunity to create new high quality homes in a sustainable location to address the City's housing need. The site has the opportunity to create a sustainable living environment close to services, facilities and public transport routes.
- 4.103 Being close to existing services and facilities as well as public transport to the wider City and region makes the Whitley Lane site the ideal location for new homes. This will allow the creation of high quality new homes and also support the new residents in making sustainable movement choices.
- 4.104 The Whitley Lane site is an opportunity to create a truly sustainable housing development for the twenty-first century.

Site Proposals

- 4.105 Strata Homes therefore consider that their site at Whitley Lane should be allocated for housing purposes to address this significant shortfall in housing over the Plan period.
- 4.106 The Whitley Lane site is an appropriate site to provide for the housing needs of the Plan area in the short term. The site is available, suitable and achievable and therefore deliverable in accordance with the Framework.
- 4.107 The Whitley Lane site which is surrounded by development and sits in an urban context should be considered as a priority for allocation.
- 4.108 A site summary is provided in response to Policy SA5 and the Advocacy Report is attached at Appendix 2.

Proposed Change

- 4.109 To overcome the objection and address soundness matters, the following changes are proposed:
- Update the evidence base.

- Increase the housing requirement.
- Identify further housing sites.
- Identify safeguarded land for longer term development.
- Allocate the site at Whitley Lane, Ecclesfield for housing use.

05 Policy SP2

Policy SP2: Spatial Strategy

- 5.1 The Spatial Strategy will not deliver the housing need and does not reflect the evidence base, national policy and guidance and is therefore unsound.

Justification

- 5.1 As highlighted earlier in the General Comments section of these representations, Strata Homes has concerns with the approach of the Spatial Strategy and how it was identified.
- 5.2 Strata Homes does not consider that the Spatial Strategy and the strategic approach of the Plan will meeting the identified housing needs.
- 5.3 The Spatial Option 3 proposed is one of urban brownfield and greenfield sites and one brownfield housing site in the Green Belt for circa 280 homes. Strata Homes considers that their site at Whitley Lane, Ecclesfield should be identified. The site is already partly within the Urban Area, is in a sustainable location close to services and facilities and can facilitate the delivery of public transport improvements.
- 5.4 Strata Homes considers that the strategy should be developed to meet the identified needs and should be developed in such a manner that does not prevent the delivery of other sustainable sites or sustainable developments.

Proposed Change

- 5.5 To overcome the objection and address soundness matters, the following changes are proposed:
- Update Spatial Strategy to address the evidence base and meet the identified housing needs.
 - Allocate the site at Whitley Lane, Ecclesfield for housing use.

06 Policy SA1

Policy SA1: Central Sub-Area

- 6.1 The Central Sub-Area sites will not meet the identified need for housing.

Justification

- 6.2 This Sub-Area includes significant urban brownfield sites and a significant proportion of the proposed new homes over the Plan period. However, as highlighted earlier there is very little evidence on the deliverability of the sites allocated.
- 6.3 As stated earlier this is evidenced within the start of the housing chapter the difficulties with the housing supply over the Plan period, stating that “there is not yet sufficient evidence to show it is deliverable before 2029” and that “public intervention will be needed to enable much of the former employment land to transition to sustainable, desirable residential areas” and that “many of the potential development sites have multiple owners” and there is a need for financial support from the Government.
- 6.4 Strata Homes have analysed the potential housing supply, as summarised in response to Policy SP1 and a summary table attached at Appendix 1. This shows sites in this area, including Sites SV07, HC15, SV08, SV09, SU06, HC04 and SV10 all having significant deliverability constraints comprising sites which are still currently in use and operational, no evidence on availability and multiple ownerships.
- 6.5 Strata Homes therefore considers that the strategy should be developed to meet the identified needs and should be developed in such a manner that does not prevent the delivery of other sustainable sites or sustainable developments.

Proposed Change

- 6.6 To overcome the objection and address soundness matters, the following changes are proposed:

- Update Spatial Strategy to address the evidence base and meet the identified housing needs.
- Allocate the site at Whitley Lane, Ecclesfield for housing use.

07 Policy SA2

Policy SA2: Northwest Sheffield Sub-Area

- 7.1 The Northwest Sheffield Sub-Area sites will not meet the identified need for housing.

Justification

- 7.1 This Sub-Area includes 1,015 new homes. However, as highlighted earlier there is very little evidence on the deliverability of the sites allocated.
- 7.2 As stated earlier this is evidenced within the start of the housing chapter the difficulties with the housing supply over the Plan period, stating that “there is not yet sufficient evidence to show it is deliverable before 2029” and that “public intervention will be needed to enable much of the former employment land to transition to sustainable, desirable residential areas” and that “many of the potential development sites have multiple owners” and there is a need for financial support from the Government.
- 7.3 Strata Homes have analysed the potential housing supply, as summarised in response to Policy SP1 and a summary table attached at Appendix 1. This shows for example sites NWS10 and NWS12 where there is no evidence of availability. NWS12 has a lapsed planning permission and NWS10 is an existing industrial site, which although has planning permission for 80 homes, the existing use on site is continuing and there is no evidence of a larger number of homes towards 169 dwellings as identified in the Local Plan.
- 7.4 Strata Homes therefore considers that the strategy should be developed to meet the identified needs and should be developed in such a manner that does not prevent the delivery of other sustainable sites or sustainable developments.

Proposed Change

- 7.5 To overcome the objection and address soundness matters, the following changes are proposed:

- Update Spatial Strategy to address the evidence base and meet the identified housing needs.
- Allocate the site at Whitley Lane, Ecclesfield for housing use.

08 Policy SA3

Policy SA3: Northeast Sheffield Sub-Area

- 8.1 The Northeast Sheffield Sub-Area sites will not meet the identified need for housing.

Justification

- 8.2 This Sub-Area includes 970 new homes. However, as highlighted earlier there is very little evidence on the deliverability of the sites allocated.
- 8.3 As stated earlier this is evidenced within the start of the housing chapter the difficulties with the housing supply over the Plan period, stating that “there is not yet sufficient evidence to show it is deliverable before 2029” and that “public intervention will be needed to enable much of the former employment land to transition to sustainable, desirable residential areas” and that “many of the potential development sites have multiple owners” and there is a need for financial support from the Government.
- 8.4 Strata Homes have analysed the potential housing supply, as summarised in response to Policy SP1 and a summary table attached at Appendix 1.
- 8.5 Strata Homes therefore considers that the strategy should be developed to meet the identified needs and should be developed in such a manner that does not prevent the delivery of other sustainable sites or sustainable developments.
- 8.6 Strata Homes consider that the release of Green Belt sites should prioritise sites that benefit from good public transport connections consistent with the Framework and the overall aims of the Plan. Strata Homes consider that the strategy for Green Belt release should therefore have regard to the identified Mass Transit Corridors, and public transport connections available to enable residents to access employment alongside other services and facilities. Within the spatial options the Council also highlights that locations in the Upper and Lower Don Valley, Smithy Wood and Oxclose. A key strand through the plan is the need for inclusive growth outside the city centre, thus options for green belt release should have regard to the ability to access employment by active travel options in the first instance and by public transport.
- 8.7 Strata Homes note that the SHMA identifies that Ecclesfield and Chapelton are areas with significant shortfalls of affordable housing. The Local Plan identifies relatively few sites within

Ecclesfield and Chapeltown area, of which there are only 4 sites that are considered capable of delivering more than 40 dwellings with the largest being 88 dwellings, and the average being circa 20 dwellings per site. Furthermore, there are only two sites in Chapeltown totalling 24 dwellings. Therefore appropriate Green Belt sites around Ecclesfield and Chapeltown, which benefit from good access to public transport, and access to services and facilities including proximity to Smithy Wood business park could serve to meet the need for affordable housing, as well as the district wide shortfall in family housing, and undersupply of smaller properties for downsizers and newly forming households within Ecclesfield and Chapeltown.

- 8.8 Strata Homes consider that the appropriate areas and sites to accommodate growth would be:
- Whitley Lane, Ecclesfield.
- 8.9 **An Advocacy Report and Green Belt Assessment has been submitted previously and an Updated Advocacy Report is attached at Appendix 2.** The masterplan and vision for the proposed scheme and illustrates the potential of the scheme. The Advocacy Report is supported by technical information and the report demonstrates that the site is available, suitable and achievable and therefore deliverable in accordance with the Framework and PPG.
- 8.10 **Strata Homes object to their site at Whitley Lane, not being assessed and consider that the site should be allocated for housing.**
- 8.11 Strata Homes maintain that the identified need for housing is not sufficient to support the city and Sheffield City Regions potential and ambition for economic growth over the Plan Period. Furthermore, Strata Homes consider that there are significant concerns regarding the deliverability and rates of delivery of sites within the central area and urban area, and consider that insufficient sites have been identified for housing to meet the identified needs. Thus more sites are required. The Council have not assessed the site within the HELAA on the basis of the current policy consideration. Strata homes do not consider this to be an appropriate approach as set out above.
- 8.12 The Council have assessed the site/ wider parcel that the site lies within as part of the Councils Green Belt assessment. Strata Homes have concerns with regards to the Green Belt assessment and the robustness in its approach as set out above, Strata Homes do not agree with the findings in respect of Whitley Lane. Strata Homes have summarised their earlier Green Belt assessment within the sub section on Green Belt below.
- 8.13 Strata Homes maintains that the proposed housing site at Whitley Lane is available, suitable and achievable and is therefore in accordance with the Framework a deliverable site able to come forward in the short term/medium term.
- 8.14 The deliverability and benefits of the site is as follows:
- Overview of Proposals
- 8.15 The site is located on the edge of the urban area of Ecclesfield. The site lies adjacent to the existing urban area and is located between existing housing. It provides a logical opportunity for a sustainable urban extension that is capable of meeting the needs of the town and wider city. The site is in a highly sustainable location comprising a wide variety of housing, retail, commercial and

employment opportunities along with a broad mix of service and recreational facilities. The site is in close proximity to Junction 35 of the M1 which is immediately to the east of the site. The site is located on a key public transport route. The allocation is being promoted in an area that is already well served and has easy access to a full range of services and facilities located within Ecclesfield, as well as in Sheffield itself. The site is approximately 5.86 ha gross (3.45 net developable) and could accommodate in the region of 100 new homes.



Availability

- 8.16** The site is being promoted by Strata Homes, and is available for development. The site is therefore available in accordance with the Framework and the National Planning Practice Guidance).

Suitability

- 8.17** The site is in a highly sustainable location, on the edge of Ecclesfield benefiting from easy access to a wide range of facilities. The site is within 400m of Aldi and 800m of Morrisons. It is located along one of the identified Mass Transit corridors. The framework is clear that where it is necessary to release Green Belt land for development 'Plans should give first consideration to land which has been previously-developed and/or is well-served by public transport'. The site would allow housing to be delivered in an appropriate and sustainable locations and accords with the emphasis in the Framework to make more efficient use of land.
- 8.18** The site benefits from being located in close proximity to existing employment provision at Smithy Wood, which the Issues and Options continues to see as a key employment location. It benefits from easy access to retail opportunities within Ecclesfield, with public transport providing access to further retail and leisure facilities including at Chapeltown, Meadowhall and Sheffield City Centre.
- 8.19** It is evident that the housing needs of Sheffield will require Sheffield City Council to review the Green Belt boundaries within the City. Sheffield City Council recognises the need for Green Belt Review to support the growth and regeneration ambitions for the area through identifying the former Norton Aerodrome site. The Whitley Lane site provides an important opportunity to meet the housing needs of Ecclesfield, and wider needs of the city, which provides the exceptional circumstances to justify the release of the site from the Green Belt. The development will provide additional quality development, benefiting the settlement and wider city. The sustainability credentials of the location demonstrate that this is a suitable site for removal from Green Belt to deliver new homes. It is there for considered that the development is suitable.
- 8.20** The development will provide additional quality development that will benefit Ecclesfield and go towards meeting identified shortfalls in provision locally and wider city with economic, environmental and social benefits. It is therefore considered that the development is suitable.

Sustainability

- 8.21** The site is clearly a highly sustainable site, well connected to the urban area at Ecclesfield, with strong connectivity to the city centre, local employment opportunities and services and facilities.
- 8.22** The site is an extremely sustainable location with approximately 13 buses an hour providing sustainable transport access to Sheffield. Buses can also be caught from the bus stop adjacent to the site towards Chapeltown providing access to Chapeltown Railway Station which in turn provides a twice-hourly service to Sheffield, stopping at Meadowhall, and hourly services to Leeds and Huddersfield. The M1 Motorway Junction 35 is 1.5 miles from the site providing access to the wider region by car.
- 8.23** It is evident from that the site, and the proposed development would clearly constitute sustainable development which would afford a strong presumption in favour of allocation and future development, in the context of the Framework and the development plan.

Achievable

- 8.24 A range of technical work has been undertaken. From these initial assessments of ground conditions, ecology, drainage and highways access there are no technical issues that would prevent the delivery of suitable access into the site for residential purpose.
- 8.25 The indicative masterplan shows how a mix of housing could be accommodated within the site, alongside Public Open Space, landscaping and drainage features.
- 8.26 The highway work confirms the suitability of the site access to accommodate the proposed development. The highway work has concluded that the development proposals are acceptable and can be supported from a transport perspective.

Deliverability

- 8.27 The site at Whitley Lane provides a development opportunity that is available, suitable and achievable and therefore it is considered that the site is deliverable, in accordance with national planning policy and guidance. It is promoted by Strata Homes and is deliverable within the plan period.

Effective Use of Land

- 8.28 The proposed development at Whitley Lane is located within close proximity to existing services and facilities and benefits from excellent public transport connectivity. The scheme is therefore making an efficient and effective use of land and infrastructure.

Delivering a Flexible Supply of Housing

- 8.29 The Framework requires Local Planning Authorities to meet their full objectively assessed housing need. Strata Homes considers that the site at Whitley Lane, Ecclesfield is deliverable in the short and will reinforce the housing supply and address the Borough's housing needs in the early periods of the Local Plan. Development of this site will support the delivery of a range of housing types and contribute towards meeting identified needs.

A Positive Response to the Key Objectives of the Framework

- 8.30 The Framework sets out that the Governments key housing policy goal of significantly boosting the supply of housing and proactively driving and supporting sustainable economic development to deliver homes, business and industrial units, infrastructure and thriving local places that the country needs. The Framework explains that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as extensions to towns, and creating mixed and sustainable communities with good access to jobs, key services and infrastructure. Sites should also make effective use of land and existing infrastructure.
- 8.31 In relation to the Framework:
- The proposal responds positively towards national guidance.

- The site is appropriate for accommodating housing growth, being an expansion of an existing settlement.
- The proposed site is accessible to existing employment local community facilities, infrastructure and services, including public transport.
- The site has been assessed as being available, suitable and achievable for development

Benefits of Whitley Lane, Ecclesfield

8.32 The development of the site would provide significant economic, social and environmental benefits. The site would provide housing that would meet the needs of the Sheffield housing market. Therefore this site provides a unique opportunity in a sustainable location and without compromising the Green Belt function and purpose.

8.33 In accordance with the Framework this representation has shown that:

- The site is suitable for housing and can deliver circa 100 new homes.
- The proposal can provide a good mix of housing commensurate to the demand and need in the area.
- The site is located in close proximity to existing community facilities and retail facilities, including two supermarkets and schools.
- Well served by bus routes linking to Sheffield, Rotherham, Barnsley and Penistone.
- Access to the motorway network through junction 35 of the M1
- Close to Smithy Wood Business Park and Meadowhall and potential places of employment
- The scheme uses land efficiently and effectively.
- The proposal is in line with planning for housing objectives.
- The proposal will deliver public open space with opportunity to create a green route through the site connecting to existing Green Links, and existing public rights of way.
- The scheme will create direct and indirect job opportunities both during and after construction.

8.34 The proposal is an appropriate site to provide for the housing needs of Sheffield in the short term. Confirmation of the allocation will contribute positively to a balanced housing supply in the City in sustainable locations. The site can deliver a full range and mix of housing as part of a sustainable community. Development of the site would deliver affordable housing. Sheffield needs to have a robust housing trajectory with a sufficient supply of deliverable sites. The site at Whitley Lane, Ecclesfield will assist with this delivery in the short term. The site is situated within a prime location suitable for residential development and as such would facilitate the development of land in an effective and efficient manner. Development of the site would not harm or undermine the area's wider policy objectives, but seeks to reinforce the need to develop sites within sustainable locations as a priority.

8.35 The site is available, suitable and achievable and therefore deliverable in accordance with the Framework.

Proposed Change

8.36 To overcome the objection and address soundness matters, the following changes are proposed:

- Update Spatial Strategy to address the evidence base and meet the identified housing needs.
- Allocate the site at Whitley Lane, Ecclesfield for housing use.

09 Policy SA4

Policy SA4: East Sheffield Sub-Area

- 9.1 The East Sheffield Sub-Area sites will not meet the identified need.

Justification

- 9.2 This Sub-Area includes 2,945 new homes. However, as highlighted earlier there is very little evidence on the deliverability of the sites allocated.
- 9.3 As stated earlier this is evidenced within the start of the housing chapter the difficulties with the housing supply over the Plan period, stating that “there is not yet sufficient evidence to show it is deliverable before 2029” and that “public intervention will be needed to enable much of the former employment land to transition to sustainable, desirable residential areas” and that “many of the potential development sites have multiple owners” and there is a need for financial support from the Government.
- 9.4 Strata Homes have analysed the potential housing supply, as summarised in response to Policy SP1 and a summary table attached at Appendix 1. This shows for example sites ES25 and ES27. ES 25 is currently in open space use and where the Open Space Assessment highlights insufficient green space in the locality, whilst ES27 is a cleared site that requires intervention to come forward and will therefore take time.
- 9.5 Strata Homes therefore considers that the strategy should be developed to meet the identified needs and should be developed in such a manner that does not prevent the delivery of other sustainable sites or sustainable developments.

Proposed Change

- 9.6 To overcome the objection and address soundness matters, the following changes are proposed:

- Update Spatial Strategy to address the evidence base and meet the identified housing needs.
- Allocate the site at Whitley Lane, Ecclesfield for housing use.

010 Policy SA5

Policy SA5: Southeast Sheffield Sub-Area

- 10.1 The Southeast Sheffield Sub-Area sites will not meet the identified need.

Justification

- 10.2 This Sub-Area includes 1,640 new homes. However, as highlighted earlier there is very little evidence on the deliverability of the sites allocated.
- 10.3 As stated earlier this is evidenced within the start of the housing chapter the difficulties with the housing supply over the Plan period, stating that “there is not yet sufficient evidence to show it is deliverable before 2029” and that “public intervention will be needed to enable much of the former employment land to transition to sustainable, desirable residential areas” and that “many of the potential development sites have multiple owners” and there is a need for financial support from the Government.
- 10.4 Strata Homes have analysed the potential housing supply, as summarised in response to Policy SP1 and a summary table attached at Appendix 1. This shows for example sites SES10, SES11 and SES12. SES12 is another area of open space, whilst there is no evidence that SES11 is available.
- 10.5 Strata Homes therefore considers that the strategy should be developed to meet the identified needs and should be developed in such a manner that does not prevent the delivery of other sustainable sites or sustainable developments.

Proposed Change

- 10.6 To overcome the objection and address soundness matters, the following changes are proposed:
- Update Spatial Strategy to address the evidence base and meet the identified housing needs.

- Allocate the site at Whitley Lane, Ecclesfield for housing use.

011 Policy SA6

Policy SA6: South Sheffield Sub-Area

11.1 The South Sheffield Sub-Area sites will not meet the identified need.

Justification

11.2 This Sub-Area includes 765 new homes. However, as highlighted earlier there is very little evidence on the deliverability of the sites allocated.

11.3 As stated earlier this is evidenced within the start of the housing chapter the difficulties with the housing supply over the Plan period, stating that “there is not yet sufficient evidence to show it is deliverable before 2029” and that “public intervention will be needed to enable much of the former employment land to transition to sustainable, desirable residential areas” and that “many of the potential development sites have multiple owners” and there is a need for financial support from the Government.

11.4 Strata Homes have analysed the potential housing supply, as summarised in response to Policy SP1 and a summary table attached at Appendix 1. This area includes site SS17: former Norton Aerodrome for circa 280 new homes on part of the site, which will be released from the Green Belt.

11.5 Strata Homes therefore considers that the strategy should be developed to meet the identified needs and should be developed in such a manner that does not prevent the delivery of other sustainable sites or sustainable developments.

Proposed Change

11.6 To overcome the objection and address soundness matters, the following changes are proposed:

- Update Spatial Strategy to address the evidence base and meet the identified housing needs.

- Allocate the site at Whitley Lane, Ecclesfield for housing use.

012 Policy SA7

Policy SA7: Southwest Sheffield Sub-Area

12.1 The Southwest Sheffield Sub-Area sites will not meet the identified need.

Justification

12.2 This Sub-Area includes 755 new homes. However, as highlighted earlier there is very little evidence on the deliverability of the sites allocated.

12.3 As stated earlier this is evidenced within the start of the housing chapter the difficulties with the housing supply over the Plan period, stating that “there is not yet sufficient evidence to show it is deliverable before 2029” and that “public intervention will be needed to enable much of the former employment land to transition to sustainable, desirable residential areas” and that “many of the potential development sites have multiple owners” and there is a need for financial support from the Government.

12.4 Strata Homes have analysed the potential housing supply, as summarised in response to Policy SP1 and a summary table attached at Appendix 1.

12.5 Strata Homes therefore considers that the strategy should be developed to meet the identified needs and should be developed in such a manner that does not prevent the delivery of other sustainable sites or sustainable developments.

Proposed Change

12.6 To overcome the objection and address soundness matters, the following changes are proposed:

- Update Spatial Strategy to address the evidence base and meet the identified housing needs.
- Allocate the site at Whitley Lane, Ecclesfield for housing use.

013 Policy SA8

Policy SA8: Stocksbridge/Deepcar Sub-Area

13.1 The Stocksbridge/Deepcar Sub-Area sites will not meet the identified need housing.

Justification

13.2 This Sub-Area includes 928 new homes. However, as highlighted earlier there is very little evidence on the deliverability of the sites allocated.

13.3 As stated earlier this is evidenced within the start of the housing chapter the difficulties with the housing supply over the Plan period, stating that “there is not yet sufficient evidence to show it is deliverable before 2029” and that “public intervention will be needed to enable much of the former employment land to transition to sustainable, desirable residential areas” and that “many of the potential development sites have multiple owners” and there is a need for financial support from the Government.

13.4 Strata Homes have analysed the potential housing supply, as summarised in response to Policy SP1 and a summary table attached at Appendix 1. This shows for example sites SD03 where there is no evidence of availability. The site has an expired permission and is an ex-steel works site. The site could have come forward previously and there are therefore likely to be contamination and viability issues.

13.5 Strata Homes therefore considers that the strategy should be developed to meet the identified needs and should be developed in such a manner that does not prevent the delivery of other sustainable sites or sustainable developments.

Proposed Change

13.6 To overcome the objection and address soundness matters, the following changes are proposed:

- Update Spatial Strategy to address the evidence base and meet the identified housing needs.
- Allocate the site at Whitley Lane, Ecclesfield for housing use.

014 Policy SA9

Policy SA9: Chapeltown/High Green Sub-Area

- 14.1 The Chapeltown/High Green Sub-Area sites will not meet the identified need for housing.

Justification

- 14.2 This Sub-Area includes 24 new homes across two sites, both of which are brownfield sites, one is a swimming baths and the other is a former training centre. However, as highlighted earlier there is very little evidence on the deliverability of the sites allocated.
- 14.3 As stated earlier this is evidenced within the start of the housing chapter the difficulties with the housing supply over the Plan period, stating that “there is not yet sufficient evidence to show it is deliverable before 2029” and that “public intervention will be needed to enable much of the former employment land to transition to sustainable, desirable residential areas” and that “many of the potential development sites have multiple owners” and there is a need for financial support from the Government.
- 14.4 Strata Homes considers as a principal area within Sheffield and sustainable settlement with a railway station, services and facilities and a town centre that Chapeltown should be accommodating more housing than circa 25 new homes in the Plan period.
- 14.5 Strata Homes have analysed the potential housing supply, as summarised in response to Policy SP1 and a summary table attached at Appendix 1.
- 14.6 Strata Homes therefore considers that the strategy should be developed to meet the identified needs and should be developed in such a manner that does not prevent the delivery of other sustainable sites or sustainable developments.

Proposed Change

14.7 To overcome the objection and address soundness matters, the following changes are proposed:

- Update Spatial Strategy to address the evidence base and meet the identified housing needs.
- Allocate the site at Whitley Lane, Ecclesfield for housing use.

015 Policy H1

Policy H1: Scale and Supply of New Housing

- 15.1 Strata Homes consider that Policy H1 will not deliver the housing need and does not reflect the evidence base, national policy and guidance and is therefore unsound.

Justification

- 15.2 Policy H1 states that the delivery of new homes will be in accordance with Policies SP1 and SP2 and be primarily on previously developed sites in the urban area. However, as stated earlier in response to Policies SP1 and SP2, Strata Homes do not consider this strategy to meet the identified housing needs over the Plan period.
- 15.3 Part c) of the policy states that new housing will be delivered on sites that already have planning permission, on housing allocations, in broad locations for growth and through windfalls. However, as stated in response to Policy SP1, Strata Homes have analysed the proposed sites and consider that there are significant constraints and that the Local Plan is deficient in its housing provision.
- 15.4 Further to our comments in response to Policy SP1 Part c) also states that windfalls will form part of the housing provision, but there is little evidence to support this, especially when the Spatial Strategy is one of urban concentration and the brownfield sites are largely allocated for housing or employment and that the employment strategy is based on recycling employment sites. Strata Homes do not consider that there will be many windfall sites and that a full appropriate provision of housing should be identified.
- 15.5 The need for affordable housing is also significant and part e) suggests that the housing requirement incorporates this need. As highlighted earlier in response to Policy SP1, Strata Homes consider that the housing requirement needs to increase to account for this need.
- 15.6 Similar to our comments to Policy SP1, Strata Homes notes that the Council has identified Broad Locations within the Urban Area for future growth. However, as stated in the supporting text “there is not yet sufficient certainty to allocate all the land that is potentially suitable for housing in these areas”. These areas require relocation of uses, land assembly and new infrastructure. These sites are long term and cannot be relied upon. Strata Homes considers appropriate housing sites should be identified to deliver the requisite number of homes for the full Plan period.

Furthermore, the equivalent long term sites should be identified in the Green Belt. In accordance with the Framework safeguarded land for longer term development needs should be identified and which can be released as a resource to ensure the housing needs of the City are met.

Proposed Change

15.7 To overcome the objection and address soundness matters, the following changes are proposed:

- Update Spatial Strategy to address the evidence base and meet the identified housing needs.
- Identify safeguarded land for longer term development.
- Allocate the site at Whitley Lane, Ecclesfield for housing use.

016 Policy ES1

Policy ES1: Measures required to achieve Reduced Carbon Emissions in New Development

- 16.1 Strata Homes supports the reduction in carbon emissions, however policies should be flexible and reflect national policy and guidance.

Justification

- 16.2 Policy ES1 stipulates the measures that should be incorporated into new developments to achieve a reduction in carbon emissions in new developments.
- 16.3 However, it is unclear from the Viability Appraisal how the additional costs have been incorporated into the assessment and where the evidence is derived from. Therefore, the evidence supporting the Plan does not robustly support the policy approach and the potential implications for development, which are mostly urban brownfield sites.
- 16.4 The Viability Appraisal provides a number of percentage cost increases to incorporate into residential schemes and then states “it is clear from a range of data sources that the additional costs will vary tremendously depending on the specifics of the building under consideration”. It is therefore unclear what cost has been incorporated for Policy ES1.
- 16.5 Policy ES1 requires further evidence and be fully justified in relation to implications for potential development schemes.

Proposed Change

16.6 To overcome the objection and address soundness matters, the following changes are proposed:

- Update evidence.
- Incorporate flexibility.

017 Policy ES2

Policy ES2: Renewable Energy Generation

- 17.1 Strata Homes supports the reduction in carbon emissions, however policies should be flexible and reflect national policy and guidance.

Justification

- 17.2 Policy ES2 expects the use of low-carbon energy sources in new developments. However, the Viability Appraisal only assesses solar panels.
- 17.3 There is no assessment on residential schemes and other forms of energy generation and therefore the implications for the delivery of sites, which are mostly brownfield urban schemes.
- 17.4 Policy ES2 requires further evidence and be fully justified in relation to implications for potential development schemes.

Proposed Change

- 17.5 To overcome the objection and address soundness matters, the following changes are proposed:
- Update evidence.
 - Incorporate flexibility.

018 Policy ES3

Policy ES3: Renewable Energy Networks and Shared Energy Schemes

- 18.1 Strata Homes welcomes the ambitions to reduce carbon emissions. However, Policy ES3 requires flexibility to be in accordance with the Framework.

Justification

- 18.2 Policy ES3 states that new schemes will be required to connect to District Energy Networks will, where feasible, and for significant new developments to prepare a feasibility assessment for establishing a new network.
- 18.3 The Viability Appraisal assesses £5,000 per unit for housing and £3,000 per unit for flatted developments. However, there is little justification or evidence for these assumed costs and the Viability Appraisal states that there are few published costs.
- 18.4 The Framework at paragraph 16 point d) states that Plans should: *“contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.”* It is clear then that policies should be clear and make sense to decision makers. The current wording of this policy should therefore be amended to incorporate flexibility.

Proposed Change

- 18.5 To overcome the objection and address soundness matters, the following changes are proposed:
- Amend the policy to incorporate flexibility.

019 Policy ES4

Policy ES4: Other Requirements for the Sustainable Design of Buildings

- 19.1 Strata Homes supports the reduction in carbon emissions, however policies should be flexible and reflect national policy and guidance.

Justification

- 19.1 Policy ES4 requires, where relevant, to maximise the incorporation of sustainable design features, including green, blue or brown roofs. The terminology of the policy is vague “expected to maximise” and “as relevant” and should be amended to be clear, especially to maximise but only where relevant.
- 19.2 The Framework at paragraph 16 point d) states that Plans should: *“contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.”* It is clear then that policies should be clear and make sense to decision makers. The current wording of this policy is unclear and vague and should therefore be amended to be clear and incorporate flexibility.
- 19.3 Furthermore, the Viability Appraisal does not appear to include sufficient provision for Policy ES4. It only appears to consider green roofs and makes only a small percentage allowance for housing and flatted schemes.
- 19.4 Therefore, there is no evidence supporting the policy approach or an assessment of its implications, especially in a Local Plan that is focussed on brownfield urban sites.

Proposed Change

19.5 To overcome the objection and address soundness matters, the following changes are proposed:

- Update evidence.
- Amend policy to for clarity purposes.
- Incorporate flexibility.

020 Policy NC3

Policy NC3: Provision of Affordable Housing

- 20.1 Strata Homes does not consider Policy NC3 accords with national policy and guidance.

Justification

- 20.2 Policy NC3 states that a contribution towards the provision of affordable housing will be required from sites with the capacity of 10 or more dwellings.
- 20.3 The policy then continues indicating a minimum requirement ranging from 10% to 30% dependent on the affordable housing market area. It also sets the affordable housing tenure mix, which should be 25% First Homes, 25% social rent or equivalent affordable tenures and 50% affordable rent or housing for intermediate or equivalent affordable tenures.
- 20.4 Strata Homes is concerned, as highlighted in response to Policy SP1 that the affordable housing need will not be met in the City and the proposed housing requirement and Spatial Strategy is insufficient.
- 20.5 The Sheffield and Rotherham SHMA (July 2019) identifies an annual shortfall in affordable units of 902 dwellings in Sheffield, it also recommends as a guideline of 25% of units could be shared ownership, affordable rent or other intermediate products. It suggests that the majority of affordable homes should be homes for social rent.
- 20.6 However, the Sheffield Whole Plan Viability Appraisal identified viability issues in Sheffield. The Viability Appraisal states that when assessed under the methodology set out in the PPG development in the Central Area, East and North East is unviable. The Appraisal also states that Private Rented Schemes are unviable. The Appraisal also states that the Council should be cautious about relying on development in the Central Area, and East and North East and on brownfield sites in the Urban West, Stocksbridge/Deepcar, and Rural Upper Don Valley and Chapelton/Ecclesfield areas to deliver its housing requirement.
- 20.7 Strata Homes supports the need to address the affordable housing requirements of the City. However, the Framework is clear that the derivation of affordable housing policies must not only take account of need but also viability and deliverability. The Council should be mindful that it is unrealistic to negotiate on a site-by-site basis because the base-line aspiration of a policy or

combination of policies is set too high as this will jeopardise future housing delivery. The Viability Appraisal highlights the issues with viability in the area, and the conclusions highlight the challenges faced by the Council in terms of preparing policy and for developers providing the full policy requirements.

- 20.8** The Framework is also clear that where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership. Strata Homes is concerned that evidence is not available to demonstrate this and the proposed policy may not deliver this requirement.
- 20.9** Strata Homes consider that further sites are needed to be identified to meet the affordable housing needs in the City.

Proposed Change

20.10 To overcome the objection and address soundness matters, the following changes are proposed:

- Provide evidence and clarification
- Amend the policy to incorporate flexibility.
- Allocate the site at Whitley Lane, Ecclesfield for housing use.

021 Policy NC5

Policy NC5: Creating Mixed Communities

21.1 Strata Homes does not consider Policy NC5 accords with national policy and guidance.

Justification

21.2 Policy NC5 requires that development of 30 or more dwellings in the City Centre and other highly accessible locations that no more than half the homes consist of one-bedroom apartments and studios. It also requires a greater mix of house types on developments of 30 or more dwellings in other locations to include homes for larger households.

21.3 Strata Homes understands the need for a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the local area.

21.4 The Framework at paragraph 16 point d) states that Plans should: *“contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.”* It is clear then that policies should be clear and make sense to decision makers. The current wording of this policy should therefore be amended to incorporate flexibility.

21.5 Strata Homes recommends a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site. Such an approach would ensure that the scheme is viable and provides an appropriate mix for the location and market.

Proposed Change

21.6 To overcome the objection and address soundness matters, the following changes are proposed:

- Amend the policy to incorporate flexibility.

022 Policy NC8

Policy NC8: Housing Space Standards

- 22.1 Strata Homes does not consider Policy NC8 accords with national policy and guidance.

Justification

- 22.1 Policy NC8 states that all new housing should comply with the Government's nationally described space standards and any subsequent updates. This is verified in the supporting text which states that all new housing should comply with the optional nationally described space standards as well as the provision for outdoor amenity space.
- 22.2 Strata Homes would like to highlight that any policy seeking to implement national space standards for new homes needs to be accompanied by appropriate justification and evidence. The enhanced standards, as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a 'need to have' rather than a 'nice to have' basis. PPG (ID 56-020) identifies the type of evidence required to introduce such a policy.
- 22.3 Strata Homes is generally supportive of providing homes that are suitable to meet the needs of older or disabled people. However, there needs to be appropriate evidence and suitable flexibility in the policy to address site specific considerations, including topography and flood risk/drainage. Such site specific factors is in accordance with national policy and guidance.
- 22.4 Furthermore, if the Council wishes to adopt the higher optional standards for accessible and adaptable homes the Council should only do so by applying the criteria set out in the PPG. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability.
- 22.5 In preparing such a policy the Council should also be aware that the Government is seeking to raise accessibility standards through Building Regulations to M4(2) as a minimum for all new homes.

- 22.6 Strata Homes is concerned with regards to the interaction of this policy with other policies in the emerging Local Plan and the ability for sites to accommodate the aspired number of new homes. Strata Homes consider that further sites are needed to be identified to deliver the requisite number of homes in the Plan.

Proposed Change

- 22.7 To overcome the objection and address soundness matters, the following changes are proposed:
- Provide evidence and clarification.
 - Amend the policy to incorporate flexibility.
 - Allocate the site at Whitley Lane, Ecclesfield for housing use.

023 Policy NC9

Policy NC9: Housing Density

- 23.1 Strata Homes is concerned that the interaction of this policy with other policies in the Plan shows that this policy is inconsistent with the Spatial Strategy and the Plan is unsound.

Justification

- 23.2 Policy NC9 establishes the density requirements for different areas of the City, which ranges from 70 dwellings per hectare (dph) within or near to the Central Area, 50 to 80dph within or near to District Centres, 40 to 70dph within easy walking distance of tram stops and high frequency bus routes, 30 to 50dph in remaining parts of the urban area and 30 to 40dph in the rural areas. It allows for exceptions to these requirements to reflect the character of a Conservation Area or to protect a heritage asset, to create different density character areas on larger development sites or are necessary to protect an environmentally sensitive area.
- 23.3 Strata Homes consider that flexibility is important to this policy, as its interaction with other policies in the Plan, such as on site Public Open Space, green and blue infrastructure, tree planting, BNG, residential space standards will all affect potential housing densities.
- 23.4 Strata Homes suggest that further flexibility is incorporated and a review of densities occurs in terms of potential housing provision within the proposed Plan. Strata Homes suggest that further sites are needed to be identified to address the reduction in potential homes due to the interaction of policies.
- 23.5 The Framework at paragraph 16 point d) states that Plans should: *“contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.”* It is clear then that polices should be clear and make sense to decision makers. The current wording of this policy should therefore be amended to incorporate flexibility.

Proposed Change

23.6 To overcome the objection and address soundness matters, the following changes are proposed:

- Amend the policy to incorporate flexibility.
- Allocate the site at Whitley Lane, Ecclesfield for housing use.

024 Policy GS6

Policy GS6: Biodiversity Net Gain

- 24.1 Strata Homes is concerned that Policy GS6 does not accord with national policy and guidance and is therefore unsound.

Justification

- 24.2 Policy GS6 states that a minimum of 10% gain from pre to post development must be achieved for all habitat types evident on site. Furthermore, Policy GS6 sets out criteria for where in excess of a 10% net gain may be required.
- 24.3 Stem d) of Paragraph 174 of the Framework states that planning policies should “minimise impacts on and provide net gains for biodiversity”. If a development delivers the 10% minimum requirement by law it will ensure that paragraphs 174(d) of the Framework is addressed as it will ensure a net gain. As such any level above this is not necessary to make a development acceptable in planning terms and cannot be made a requirement in the Local Plan. Therefore, Strata Homes does not consider that requiring Biodiversity Net Gain above a minimum of 10% meets the tests set out in paragraph 57 of the Framework.
- 24.4 As the Government note on page 9 of their response to the consultation on Biodiversity Net Gain, they considered 10% to deliver the right balance between “ambition, achieving environmental outcomes, and deliverability and cost to developers”.
- 24.5 Strata Homes consider it should be for the developer to decide whether they go beyond 10%. This is a position the Government also supports stating on page 9 of their response to the consultation on net gain that the 10% should not be a cap on the aspirations of developers who want to go further “voluntarily”. It is important to remember that it is impossible to know what the cost of delivering net gain is until the base level of biodiversity on a site is known and consequently what is required to achieve a 10% net gain. On some sites this may be achievable on site with no reduction in developable area, for others it may require a large proportion of it to be addressed offsite, or a significant reduction in the developable area.
- 24.6 Strata Homes therefore considers Policy GS6 should be amended to achieve only a 10% Biodiversity Net Gain.

Proposed Change

24.7 To overcome the objection and address soundness matters, the following changes are proposed:

- Amend Policy GS6 to only achieve a 10% Biodiversity Net Gain.

025 Policy GS7

Policy GS7: Trees, Woodlands and Hedgerows

- 25.1 Strata Homes is concerned that Policy GS7 is requiring significant new tree planting, which could affect the delivery of developments on tightly constrained urban sites.

Justification

- 25.2 Policy GS7 requires 1 tree per dwelling. Strata Homes supports Green and Blue Infrastructure and the need for further tree planting. However, the interaction of this policy alongside the need to deliver significant new housing on urban brownfield and recycled sites may render some sites undeliverable.
- 25.3 Strata Homes considers that such ambitions for new tree planting as part of Biodiversity Net Gain can only be achieved through larger sites.
- 25.4 Strata Homes is concerned with regards to the interaction of this policy with other policies in the emerging Local Plan and the ability for sites to accommodate the aspired number of new homes. Strata Homes consider that further sites are needed to be identified to deliver the requisite number of homes in the Plan.
- 25.5 Strata Homes therefore considers that their site at Whitley Lane, Ecclesfield should be allocated for housing purposes.

Proposed Change

- 25.6 To overcome the objection and address soundness matters, the following changes are proposed:

- Amend policy to be less prescriptive.
- Allocate the site at Whitley Lane, Ecclesfield for housing use.

026 Policy DC1

Policy DC1: The Community Infrastructure Levy (CIL) and Other Developer Contributions

- 26.1 Strata Homes is concerned that the evidence base and the Viability Appraisal has limited information in relation to the assessment of Policy DC1.

Justification

- 26.2 Policy DC1 states that non-residential schemes will be required to contribute to transport infrastructure in accordance with Policy CO1 towards flood mitigation measures in accordance with Policy GS9.
- 26.3 The Viability Appraisal states that £1,500 per residential unit has been assumed for contributions towards infrastructure, which was provided in an email in April 2019 (according to footnote 66). Strata Homes is concerned that there is no supporting evidence for this assertion or how it was derived.
- 26.4 Strata Homes considers that further evidence is required and be consulted upon in relation to the Viability Appraisal.
- 26.5 Furthermore, Policy DC1 does not include flexibility in relation to viability-led planning applications in case there are changed circumstances or unknowns during the lifetime of the Plan. Such an approach is in full accordance with the Framework.

Proposed Change

- 26.6 To overcome the objection and address soundness matters, the following changes are proposed:

- Update evidence base.

Appendix 1: Housing Site Analysis

Site Reference	Site Name	No. of Dwellings	Comments	Estimated 5YS	Developable
SV10	Land at Sylvester Street	108	No evidence of planning permission onsite. Only refused and withdrawn applications. No evidence of availability. Currently used as a car park.	0	No.
NWS12	Former British Glass Labs, Crookesmoor	76	There is a implemented consent on this site for 76 units from 2005. No evidence of availability or deliverability.	0	No.
SES12	Land at Vikinglea Drive	90	No Planning Permission. Site is unlikely to come forward quickly. Requirement to gain planning permission and site set up will delay delivery. Low priced market area. Allowance for one outlet.	45	Yes.
HC04	NCP Furnival Gate Car Park	100	No Planning permission. Risk of contamination. Existing car park and businesses may need to be relocated. There is a planning refusal onsite. No evidence to suggest that car parking is not required in this location – no plans for replacement car parking.	0	No.

Site Reference	Site Name	No. of Dwellings	Comments	Estimated 5YS	Developable
SU06	Site of 1-7 Allen Street	100	Planning appears to have expired. There are multiple ownerships across the site. There are existing businesses operating across the site.	0	No.
SV09	3-7 Sidney Street	117	No Planning permission in place. The site is currently used as a car park and there is no evidence of availability. There is no assessment of whether car parking is required in this location.	0	No.
ES27	Land at Kenninghall Drive	120	No planning permission in place. The site is unlikely to come forward quickly. Requirement to gain planning permission and site set up will delay delivery onsite. Low price market area. Allowance for one outlet.	45	Yes.
SV08	Mecca Bingo	121	No planning permission in place. Bingo Hall operating onsite. There is no evidence of availability. Therefore highly unlikely to come forward in the short term. Heritage assets in close proximity may reduce unit numbers.	0	No.
HC15	Land and Buildings at	136	No planning permission in place. There are businesses currently operating onsite. Heritage assets in proximity	0	No.

Site Reference	Site Name	No. of Dwellings	Comments	Estimated 5YS	Developable
	Fitzwilliam Street		to the site may reduce capacity further. Unlikely to come forward in the short term.		
ES25	Land to the North of Bawtry Road	147	No planning permission in place. The site is a former sports ground and gym. The surrounding area has a significant deficiency in terms of open space provision. There is no evidence of consultation with Sports England regarding the loss of sports pitches. There are heritage assets in close proximity to the site. The site is highly unlikely to come forward in the short term.	0	No.
SV07	Buildings at Shoreham Street	149	No planning permission in place. The Strategic Flood Risk Assessment shows that this site would have a Significant negative impact and therefore the suitability of the site is questioned. The site has issues relating to contamination which are yet to be resolved. There is no evidence of availability. Existing business uses onsite will need to be re-located.	0	No.
SES11	Manor Top Army Reserve Centre	151	No planning permission in place. Site is within a hazardous installation consultation zone. The site contains a historic landfill site. The site appears to	0	No.

Site Reference	Site Name	No. of Dwellings	Comments	Estimated 5YS	Developable
			currently be in use and the existing use will need to be relocated. There is no evidence of availability onsite.		
SES10	Land to the East of Moor Valley Road	151	No Planning permission in place. The site is in an ecologically important area (LWS). There may be archaeological remains to be recorded. Likely to be delay in delivery of this site.	0	Yes
NWS10	Land at Outbridge Lane	169	Planning permission for 80 dwellings but no delivery. Existing businesses still appear to be operating onsite and will require relocating. There are TPO's which will be affected by development here. Heritage assets and flood risk concerns may reduce capacity and delay delivery onsite.	0	Yes
SD03	Site A Stocksbridge Steelworks	190	Planning permission appears to be expired. No development work has begun. It is likely that there is significant contamination and land fill affecting the site. There is no recent evidence of availability	0	No.
KN03	Wickes, Rutland Road	191	No Planning permission in place. There is an existing Wickes Store operating	0	No.

Site Reference	Site Name	No. of Dwellings	Comments	Estimated 5YS	Developable
			onsite and therefore no evidence of availability.		
KN04	Land at Russel Street	200	No Planning permission in place. There are existing businesses operating onsite including a Gym and a Car Park. There is therefore no evidence of availability. There is a risk of contamination onsite which will likely delay delivery. There may be significant archaeological assets onsite which may delay delivery of units.	0	No.
ES24	Manor Sites 12/13	210	Planning permission in place. Development appears to have begun. One outlet therefore likely to be delivered at 30 dpa.	150	Yes.
HC13	999 Parcel Ltd	213	Planning permission in place. This only allows for 144 Apartments. Existing business operating from site. Likely to delay delivery.	144	Yes.
SU12	134 West Bar	216	No Planning Permission. The site is within multiple ownerships and businesses are currently operating from the site. There are heritage assets which will likely reduce the number of units delivered. There is a risk of contamination onsite. There is no evidence of availability.	0	No.

Site Reference	Site Name	No. of Dwellings	Comments	Estimated 5YS	Developable
SES09	Former Newstead Estate	218	Planning permission in place. Construction appears to have begun. One outlet will allow approximately 30 dpa.	150	Yes
SU08	Buildings at Scotland Street	225	No Planning permission in place. A number of businesses are currently operating onsite. There is a risk of contamination. There are heritage assets in close proximity to the site. The site is in multiple ownerships, there is no evidence of availability.	0	No.
SES28	Woodhouse East	258	No Planning permission in place. The site is likely to have significant ecological value. The site may contain best and most versatile agricultural land which may preclude development. The site is within close proximity to a landfill site. The site was allocated in the UDP and has yet to come forwards.	0	Yes.
SS17	Norton Aerodrome	270	No Planning permission in place. There are existing open space facilities onsite which should be retained. There is a likelihood of contamination onsite which will delay delivery of the site. There are heritage assets onsite which will be harmed by development. The site is likely to have ecological	0	Yes

Site Reference	Site Name	No. of Dwellings	Comments	Estimated 5YS	Developable
			value. The site is likely therefore to deliver a lower yield of houses.		
SES08	Land at Silkstone Road	272	No Planning permission in place. The site is likely to have significant ecological value which will reduce capacity. There is a risk of contamination which may delay delivery of units. Assume one outlet due to the size of scheme a sales rate of 30dpa plus two years to obtain planning permission and six months before the site begins delivering units onsite.	75	Yes
SV04	Decathlon Eye Street	303	No Planning permission in place. There is an existing Decathlon store operating onsite and therefore no evidence of availability. There are heritage assets in close proximity to the site which will reduce the site capacity or preclude development. There is a risk of contamination on site which may delay or preclude development.	0	No
CW09	Land to North of Derek Dooley Way	336	No Planning permission in place. This site is owned by National Grid and may still be required. There is no evidence of availability. The site is likely to be contaminated which may	0	Yes.

Site Reference	Site Name	No. of Dwellings	Comments	Estimated 5YS	Developable
			delay or preclude development. The development of this site will impact upon heritage assets which may mean the capacity of the site is reduced.		
SU04	Site of Former HSBC	355	Following initial demolition and preliminary work on foundations no progress has been made for several years. There are clearly deliverability issues affecting this site which may mean that the site will not come forward within the plan period.	0	No.
LR02	Buildings at Sheaf Gardens	367	No Planning permission in place. There are a number of existing businesses currently operating onsite which includes a Gym. There are a number of landownerships covering the site and no evidence of availability of the site to accommodate new accommodation.	0	No.
ES23	Globe II Business Centre 128 Maltravers Road	371	Planning permission is in place for 85 care home units on part of the site. The remaining part of the site has no planning permission and there is no evidence of availability. Site may be contaminated which will delay delivery. No proposal for apartment scheme. The	0	No

Site Reference	Site Name	No. of Dwellings	Comments	Estimated 5YS	Developable
			developer has confirmed no intention to develop the site.		
SD02	Former Steins Tip, Deepcar	428	Planning permission in place but delays to construction and delivery of units. Assume one outlet at 30 dpa will deliver units in the plan period.	150	Yes.
LR01	B & Q Warehouse Queens Road	466	No Planning Permission in place. There is currently a B&Q Store operating onsite and therefore no evidence of availability. The site is affected by flood risk. There is a risk of contamination onsite which may delay or preclude delivery.	0	No.
KN36	Land at Penistone Road	572	There is no planning permission in place. The site is currently vacant previously developed land. The site is likely to be contaminated which may delay or preclude delivery. There are multiple ownerships onsite and therefore no evidence that the site is available. This is a large site without planning permission and is therefore unlikely to deliver in the first five years of the plan period.	0	No.
ES22	Attercliffe Canalside	596	There is no planning permission in place. The site is within a hazardous installation consultation	0	Yes.

Site Reference	Site Name	No. of Dwellings	Comments	Estimated 5YS	Developable
			<p>zone. There are nearby heritage assets which will be impacted upon by the development and will reduce the sites capacity. This is a large scheme with significant constraints to overcome without planning permission in place and therefore is unlikely to deliver in the first five years of the plan.</p>		
HC08	Moorfoot Building	714	<p>The site is currently home to Sheffield City Council offices. There is no planning permission in place which demonstrates delivery. The site is potentially contaminated which may delay or preclude development. An underground National Grid Power cable runs underneath the site. There are areas of the site which are within flood risk zones. This site is currently in use as an office for the Council, it is large and does not currently have planning permission. Therefore, it is unlikely to be delivered in the plan period.</p>	0	No.
HC03	Land and Buildings at St. Mary's Gate	1006	<p>This site does not currently have planning permission. The site is within multiple ownerships and there is no evidence of the site being available. There are businesses currently operating onsite such as</p>	0	No.

Site Reference	Site Name	No. of Dwellings	Comments	Estimated 5YS	Developable
			Office Outlet. The site is within an area of Flood Risk which may reduce the capacity of the site. There is a risk of contamination on site. This is a very large scheme without planning permission and is therefore unlikely to deliver units within the plan period.		

Appendix 2: Advocacy Report

(Bound Separately)