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To whom it may concern,

**Sheffield Emerging Local Plan - 'Our City, Our Future' – Issues and Options 2020**

Thank you for the invitation to comment on the current stage of consultation on the emerging Local Plan.

First and foremost, the Sheffield Property Association (S-PA) welcomes the renewed progress with the Sheffield Local Plan. We recognise the importance of having an up-to-date adopted Plan in providing confidence for our members, guiding new development in the city in a positive and sustainable direction, and achieving growth and success for Sheffield as a whole.

That being the case, we would also like to offer support to many of the central elements of the consultation document. Placing the utmost importance on achieving truly sustainable development and recognising the interconnectedness of this with future economic success, is to be welcomed. Accordingly, the emphasis placed in all the potential spatial options upon most development happening within the existing urban areas of the city is welcomed. It is understood that this aligns with the goals of national planning policy as well as the Council's declaration of a climate emergency, and it is right that these areas, especially the City Centre, should be the focus for growth.

That being said, as an Association we are also keenly aware of the statutory requirement for the Plan to be 'sound', and that a critical element of soundness is ensuring that the proposed extent and location of all required allocations for development, particularly housing, is 'deliverable'. In this respect, we understand that the Central Area Strategy (CAS) is intended to help explore and guide the level of growth that may be accommodated within the City Centre and some of its immediate surroundings – i.e. the 'Central Area'. Nonetheless, currently only the CAS Capacity Report has been released for public consultation to inform opinions on the different spatial options.

It is evident that whichever spatial option is chosen by the Council, its justification will be predicated on the CAS and the Capacity Report in demonstrating the deliverability of the selected number of dwellings in the Central Area. However, the available evidence contained in the CAS Capacity Report does not confirm whether or not the identified capacity is deliverable. Crucial questions remain:

- We are aware of several existing approved proposals identified within the Capacity Report that are unviable and, consequently, are highly unlikely to come forward as presently described. In these circumstances, can the Council be confident that all of the identified Central Area housing capacity is actually deliverable?
- We are aware that there remains a significant under delivery of larger family housing in the city, and that there are both physical and financial difficulties in delivering this sort of housing within the Central Area. Will the potential higher end of delivery in the Central Area (Option A) be capable of fulfilling the evident need for family housing and will that need be met in the various locations discussed?
- The Capacity Report correctly identifies some of the other constraints to delivery in the Central Area, for instance, land ownership issues and the potential need for public sector investment. Can the Council be confident, and provide the requisite evidence for the purposes of the Plan being 'sound', that such constraints can be overcome or investment provided?

Considering the aforementioned outstanding matters, there is insufficient evidence available on which to reliably comment on what level of Central Area housing development is capable of being delivered within the plan period. As a result, it is not possible to confirm at this stage which spatial option is most appropriate for the Council to take forward.

Consequently, the S-PA expects that beyond this stage of consultation, greater evidence will be provided to substantiate the level of identified growth within the Central Area, in order to ensure that the Plan is deliverable and satisfies the test of soundness.

More generally, the S-PA wishes to acknowledge the fact that for the most part when it comes to the built environment, Sheffield has a reputation as being open to new development. Invariably, if there is a suitable site in a sustainable location, especially in the Central Area, it will be able to come forward for development within the right circumstances. This openness is a strength of the city, but within the context of the previous discussion it does present a possible concern. There is no doubt that the higher end of Central Area capacity potentially sought under spatial option A will represent a fundamental step-change in the rate of non-student residential delivery in the City Centre. This begs the question: what measures and interventions are proposed to be secured through the Plan that will allow for this to be achieved? If the city already responds positively to new development, what can or will be done to successfully respond to the key deliverability questions set out above?

This ties into the consultation document's approach towards employment growth and, looking forward, the ability of the emerging Plan to reliably achieve 'more highly skilled and highly paid' jobs. Other than brief reference to the Advanced Manufacturing Innovation District (AMID), there is little to indicate specifically how higher skilled employment will be achieved. At present, other than an approximate indication of the scale of potential employment land allocations in the City Centre and 'other parts of the city', there is a lack of evidence of any plans or provisions that will deliver the higher level of employment sought. Again, as indicated previously, it is considered that this objective of the Plan will need to be achieved to help support the demand for, and delivery of, the possible higher level of Central Area housing growth. As such, we hope in future to see tangible actions presented to achieve this objective.

In line with this it is also recognised that when it comes to new development across the city as a whole, associated infrastructure/strategic transport projects will always be important, and in many areas absolutely imperative, to ensuring the sustainability and deliverability of such proposals. While the emerging Plan does recognise this (for instance in the Transport Technical Note Document), and it is understood that specific projects will be more relevant at the next site-specific stage of consultation, the significance of this must still be stressed. This is especially critical

where such projects -that will doubtless be relied upon to enable the deliverability of key parts of the housing supply- take several years to be delivered and depend on public sector investment. It is therefore requested that further insight be provided by SCC into such projects to help provide confidence of the associated deliverability, in the interests of the soundness of the Plan.

Beyond the above, it is understood that views are also being sought with respect to more specific housing issues, such as whether the Plan should seek to adopt Nationally Described Space Standards (NDSS) for new homes, and the need for older people's accommodation. The S-PA recognises the critical importance of viability issues acting as a constraint to delivery, but nonetheless believes that to ensure that future development contributes to the health and happiness of all of Sheffield's residents, NDSS should be adopted, subject to the Local Plan Viability Assessment demonstrating that this will not render proposed allocations undeliverable.

Likewise, with an ageing population the need for older people's housing (e.g. care homes, sheltered housing, 'independent living') must be met through the Plan. It must be appreciated though that the impact of ensuring that such objectives are met may constrain the delivery of use class C3 dwelling houses and the need to meet the NDSS can reduce the overall capacity of development sites. As a result, the Council must give careful consideration to this important issue and ensure that, moving beyond this consultation to site-specific allocations, where necessary, additional sites are allocated to ensure that all Sheffield's housing needs are met. This may be felt most keenly in the Central Area where denser development will be most significantly affected by the NDSS, with overall capacity being consequently constrained.

In locations outside of the Central Area, the identification of land for housing should reflect evidence of need within an up to date Housing Needs Assessment. The HELAA 2020 confirms that whilst extensive previously developed land can be identified, at least 40% of this land has acknowledged viability constraints or is undeliverable within the future plan period. Where brownfield land is available, the challenges of delivering housing on such sites must be acknowledged and a robust viability assessment undertaken in order to ensure that planning requirements in relation to affordable housing, open space and other planning contributions act as an incentive to development, rather than undermining delivery. This approach will ensure that sufficient housing is delivered to support the economic objectives of the plan, which as set out above should be ambitious and clearly focused.

The S-PA wants to support the emerging Sheffield Local Plan and enable our city to achieve its full potential and a sustainable future. However, as currently presented within the consultation document, it is clear that a more robust evidence base will be required to achieve a sound Local Plan for Sheffield.

We trust that the above commentary is of use in further consideration beyond the Issues and Options stage of the Plan and look forward to future close engagement.

Faithfully,

Yours sincerely



Martin McKervey, Chair  
On behalf of the Sheffield Property Association