

## **Matter 4: The Spatial Strategy**

*Issue 1: Are the Vision, Aims and Objectives of the Plan soundly based?*

4.1 Are the Vision, Aims and Objectives of the Plan appropriate for Sheffield and are they soundly based and supported by evidence? Do they align with the Spatial Strategy?

4.2 Are there any other matters which should be included, clarified, or given greater emphasis within the Vision, Aims and Objectives?

4.3 How does Figure 1 relate to the vision statement set out in paragraphs 2.2 - 2.9, and is there internal consistency in this regard?

*Issue 2: Whether the Overall Growth Plan is justified and effective?*

*Note: Detailed questions on a number of elements of Policy SP1 will be covered in relevant Matters.*

**4.4 Is the Overall Growth Plan, as set out in Policy SP1, justified and consistent with national policy? Will it provide an effective basis to deliver the Vision for Sheffield?**

1. The Vision states that the city will provide a good quality housing offer meeting the needs of different household types and sizes. The HBF does not consider that SP1 will provide this good quality housing offer that meets the needs of different household types and sizes.

**4.5 Is there robust evidence that the 372 site allocations referred to in Policy SP1 c) are deliverable/developable, and that they can be relied upon to meet Sheffield's needs for housing, employment, mixed use and recreational development within the Plan period?**

1. The HBF does not consider that there is robust evidence that the 297 housing allocations are deliverable or developable, and is concerned that as such they cannot be relied upon to meet Sheffield's needs for housing within the Plan period. The Sheffield Housing and Economic Land Availability Assessment (Dec 2023) provides very limited information.

4.6 Having regard to Policy SP1 m), how does the Plan set out a positive strategy for the conservation and enjoyment of the historic environment, consistent with paragraph 190 of the Framework?

*Issue 3: Is the Plan's Spatial Strategy soundly based?*

**4.7 Is the Plan's Spatial Strategy soundly based? Does it represent an appropriate strategy when considered against the reasonable alternatives available?**

2. The Spatial Strategy aims the majority of growth on previously developed sites within existing urban areas, it also sets out 9 sub-areas and states that they will deliver a pattern of sustainable development within the settlement hierarchy of Sheffield (Main Urban Area) and the identified Principal Towns, Larger Villages and Smaller Villages.
3. The HBF considers that the Spatial Strategy can only be considered appropriate, if it ensure that the vision, aims and objectives are met and housing needs for all members of the local community are met. In order for the Spatial Strategy to be appropriate, it may be that the Council needs to move through the settlement hierarchy more effectively to

ensure that all of the housing needs of all groups of the local community are met, these include those that need affordable housing, family housing and housing suitable for older or disabled people. It may also be that whilst there is a focus on previously developed sites within the existing urban areas that this does not prevent development elsewhere within the Council area, particularly where it helps to meet housing need eg family housing or affordable homes.

4. The HBF considers that whilst it is appropriate to support the use of previously developed sites and to give weight to the value of using brownfield sites this needs to be done in the right way and should not prevent the delivery of other sustainable sites or sustainable developments. The Council will need to be able to demonstrate with evidence that this strategy is deliverable and developable over the Plan period, will meet the varied housing need and will not lead to a shortage of homes being delivered.

**4.8 How was the distribution of development established within the Plan? What alternative options were considered as part of the Plan's preparation and why were they discounted? What was the process, and what factors influenced the spatial distribution of development across the Plan Area? Why was the preferred option chosen?**

5. The Issues and Options (2020) consultation considered three spatial options:
  - Option A - high density, vibrant walkable neighbourhoods with a wide choice of homes, located in the Central Area – in and around the City Centre and at Attercliffe;
  - Option B – Mid-rise and vibrant central area and some new houses with private gardens in the suburbs, located in the Central Area and some limited areas on the edge of the City; and
  - Option C – Less dense central area, more new houses with private gardens in the suburbs, located on the edges of the city including some Green Belt.
6. The Issues and Options Consultation Report Summary of Comments and Council Response, states that following the Issues and Options consultation, Members engaged in discussion around the preferred spatial option for the Local Plan. It provides no detail of this discussion or the outcomes of it. It then goes on to state that the spatial approach taken forward in the Local Plan (SP1) sets the Central sub-area at the forefront of transformation in the city, based on its accessible location and focus for hubs, education and culture and leisure facilities. This approach means that outward expansion of the city is limited, reducing the need to travel and protecting the countryside taking account of the Green Belt. This document also states that it was concluded that exceptional circumstances do not exist to justify the removal of greenfield sites from the Green Belt.
7. The Plan does not appear to set out why the preferred option was chosen, or how the distribution of development was established or what exceptional circumstances were considered in relation to Green Belt release.

**4.9 Noting Policy SP1 n), how have flooding constraints been taken into account in determining the spatial distribution of development? Is the Plan consistent with paragraph 161 of the Framework?**

8. The NPPF<sup>1</sup> states that all plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible flood risk to people and property. Parts of Sheffield are subject to flood risk including zones 2 and 3. The Council has undertaken a Level 1 Strategic Flood Risk Assessment (SFRA), this recommends that the sequential approach must be followed in terms of site allocation. The SFRA 1 has considered 597 sites, 77 sites were recommended as being potentially unsuitable for development, 290 sites require the Exception Test and 164 potential sites require an SFRA level 2 to confirm climate change risks or progress to flood risk assessment. There does not appear to be a Level 2 SFRA within the evidence library. The HBF would expect the Council to ensure that flood risk is taken into account in determining the spatial distribution of development, to ensure that they have the appropriate evidence to demonstrate that. The HBF also note that footnote 7 of the NPPF also includes areas at risk of flooding.

**4.10 Is the Plan’s Spatial Strategy overly reliant on a mixture of large and small urban sites?**

9. The HBF is concerned that the Plan’s Spatial Strategy is overly reliant on urban sites, and whilst this may provide part of the overall strategy, the strategy should ensure that the Plan is able to deliver its vision of meeting the needs of different households types and sizes, its aim of creating thriving neighbourhoods and communities with high quality and affordable homes, and its objective to significantly increase the supply of affordable housing, accessible market housing and specialist housing for older people. The HBF is concerned that any over reliance on one type or location of housing site, could be detrimental to the delivery of the Plan, and in meeting the housing needs of the area.

**4.11 Would the strategy of focusing development within the Central Sub-Area and other urban locations align with the objective of creation of thriving neighbourhoods and communities with a housing market that works for everyone?**

10. The HBF does not consider that the strategy of focusing development within the Central Sub-Area and other urban locations on its own, aligns with the objective of creating thriving neighbourhoods and communities with a housing market that works for everyone. The HBF considers that the Council may need to consider further locations and sites to ensure that all of their housing needs are met.

**4.12 Is the Plan’s settlement hierarchy as set out in Policy SP2 and the Glossary soundly based?**

11. The HBF does not wish to comment on the settlement hierarchy at this time.

**4.13 Is the ‘20-minute neighbourhood’ within Policy SP2 appropriate and achievable?**

12. The HBF considers that the 20-minute concept can be a useful consideration when determining the appropriate location of development. However, the HBF does not consider that it should be used as a blunt tool for development management or site allocations. The HBF considers it will also be appropriate to consider the range and variety of development provided, it may be that additional development could help a

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<sup>1</sup> NPPF paragraph 161

smaller settlement or cluster of settlements to support more services and therefore contribute to the creation of a 20-minute or a more sustainable neighbourhood. The Council may also want to consider that larger developments may also be able to contribute to the creation of services or improved active travel infrastructure or open spaces. The HBF considers that there is a need for flexibility within the policy to allow for the development and promotion of sustainable developments, and to ensure that the policy is not used negatively to prevent development. The Council will also need to work on making active travel and public transport quick, easy to use, well maintained, safe and available to all, and therefore more appealing than using a car.

#### **4.14 Is the Plan's approach to Broad Locations for Growth soundly based?**

13. The Council are defining 'broad locations' within the Plan as areas of the city where more housing is likely to be delivered on brownfield sites in the longer term, they are areas which are already transitioning or have the potential to transition from employment uses to housing, sometimes with public sector support.
14. Table 1 of the Plan sets out the Housing Land Supply 2022-2039, it states that developable sites with 'broad locations for growth' and in other areas (mainly years 6-15) will provide 4,675 dwellings.
15. The Sheffield Housing and Economic Land Availability Assessment (SHELAA) appears to refer to the broad locations as large windfalls (10 or more dwellings). The SHELAA includes a large windfall allowance of 4,675 dwellings, which it states is a conservative estimate of 292dpa. It suggests that the average number of dwellings granted permission on large windfall sites between 2015/16 and 2022/23 is 736dpa, this is permissions on sites that have not previously been identified in any way in the SHELAA. However, the SHELAA proposes to only count large windfalls as part of the trajectory from 2029/30 and at a rate of 468/467dpa until the end of the Plan period.
16. The HBF would expect the Council to ensure that there is a robust methodology for the calculation of anticipated delivery from the 'broad locations'. The HBF would also assume that the Council have ensured that they are developable in line with the NPPF<sup>2</sup> definition, and that they are 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. There is no definition of 'broad locations' within the NPPF, however, the PPG in relation to housing and economic land availability assessment uses sites / broad locations interchangeably in terms of its guidance including in terms of what can be considered when assessing whether sites / broad locations are likely to be developed.
17. The HBF considers that if the Council intends to include an allowance for windfalls of whatever size that they have an appropriate evidence base to support this, this would be in line with the NPPF<sup>3</sup> which states that where an allowance is made for windfall sites there should be compelling evidence that they will provide a reliable source of supply.

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<sup>2</sup> NPPF 2023 glossary

<sup>3</sup> NPPF 2023 paragraph 71

**4.15 What investment is needed to facilitate the transition from employment to housing in the Broad Locations for Growth? Is this realistic and achievable within the Plan period?**

18. The HBF considers that this is a question for the Council, but would expect the Council to have evidence to demonstrate that these transitions can be facilitated, that investment is available, that they are realistic, and that they are achievable within the Plan period.

**4.16 With regard to the Broad Locations for Growth and the cross-referred policies listed in Policy SP1 e), have some Broad Locations been omitted? Are there inconsistencies in Policy H1 and the policies for the Sub-Areas in this regard?**

19. Policy SP1 (e) states that the Plan will deliver co-ordinated investment in the identified broad locations for growth (with parts of the Upper Don Valley, the Lower Don Valley and the Sheaf Valley) to enable these areas to transition from employment uses to housing, particularly after 2029 (see Policy SA2, Policy SA4 and Policy SA6). Policy H1(c) states that new housing will be delivered on sites in the broad locations for growth (policies SA2-SA8) and through large site windfalls.

20. Policies SA2, SA3, SA4, SA5, SA6 and SA8 all appear to state that longer term housing growth may also take place within several of the Flexible Uses Zones in the Sub-Areas (Broad Locations for Growth), where existing commercial uses will be allowed to transition to residential use.

21. The HBF considers that the Council needs to check these policies for clarity and for consistency. It would be useful if these sites were referred to by one name and description consistently through the Plan, the evidence base and the maps and diagrams.

**4.17 Are Broad Locations for Growth clearly defined on the Key Diagram, the relevant Sub-Area maps, and the Policies Map?**

22. Flexible Use Zones appear to be identified on the Policies Map and Sub-Area maps. They do not appear to be identified on the Key Diagram.

**4.18 Are the Broad Locations for Growth always consistent with the Flexible Use Zones?**

23. The HBF considers that this is a question for the Council.

**4.19 Is Policy AS1 justified and effective? Is it sufficiently flexible?**

24. This policy states that on allocated sites the required uses should cover at least 80% of the sites area. The HBF considers that this policy is not justified or effective, and that it is not sufficiently flexible. The HBF is concerned that this policy has not given sufficient consideration to the other policy requirements in this Plan and in national legislation and policy, and that it will not be sufficiently flexible to allow for other site-specific circumstances. The HBF recommends that this policy is reworded to allow for flexibility.

*Issue 4: Whether the Plan is justified, effective and consistent with national policy in relation to blue and green infrastructure and design principles and priorities?*

- 4.20 Is the approach to the protection and enhancement of blue and green infrastructure in Policies SP1 l) and BG1, consistent with national policy and supported by evidence? Is it clearly set out?
- 4.21 Which features and/or areas constitute blue and green infrastructure for the purposes of the Plan? What evidence has been used to identify them, and have they been mapped?
- 4.22 What is the Green Network? Does this encompass all blue and green infrastructure or is it different? If so, how?
- 4.23 What status does the Local Nature Recovery Network have? Is this clearly set out?
- 4.24 How does the approach to the protection of 'valuable greenspace' differ from that to be applied to all blue and green infrastructure, and what is the justification for this?
- 4.25 What is meant by 'inappropriate built development' in the final paragraph of Policy BG1, and how does this relate to the requirements set out in Policies GS1 and GS2? Is Policy BG1 consistent with national policy on the protection of Green Belts?
- 4.26 Where new green infrastructure is created, how would this be protected through the Plan?
- 4.27 Is the approach to blue and green infrastructure in Policy BG1 and SP1 part l) internally consistent? Is suggested modification LS20 needed to make the Plan sound?
- 4.28 Are suggested modifications SV6, SV8, SV9, SV14 and SV15 necessary to make Policy BG1 sound? What would the resultant policy look like?
- 4.29 Is Policy D1 consistent with national policy, justified and effective?
- 4.30 With regard to Policy D1 f) and j), where are the principles of inclusive and dementia friendly design clearly set out?
- 4.31 Does Policy D1 repeat numbering for criteria a) and b), replicate criteria e) – g) at criteria i) – k), and partially replicate criterion h) at criteria l) and m)? Does Policy D1 h) make sense as drafted?