

Matter 18: Housing Supply

Issue 1: Whether the Plan is positively prepared, justified, effective and consistent with national policy in relation to housing land supply?

18.1 What is the up-to-date position regarding actual housing completions within the Plan period?

1. The Plan identifies as the Plan period as 2022-2039. The DLUHC live tables on housing supply¹ identifies that there have been 1,667 net additional dwellings completed in Sheffield in 2022/23. The Sheffield Housing and Economic Land Availability Assessment (HELAA) (Dec 2023) states that 1,684 gross dwellings and 1,628 net dwellings were completed in Sheffield in 2022/23.

18.2 For each of the following sources of supply for the Plan period, please provide the assumptions about the density/capacity, lead-in times, timing, and annual delivery rates. What is the basis for these assumptions and are they realistic and justified?

a) Dwellings completed since the start of the Plan period;

2. This is as set out above.

b) HELAA (EXAM 3A and 3B) sites under construction;

3. The HELAA states that 6,621 dwellings were actively under construction, 6,401 dwellings on large sites and 220 dwellings on small sites. It also suggests that there were 977 dwellings on large sites where construction had started but was suspended.

c) HELAA sites with outline planning permission, but not yet commenced;

4. The HELAA identifies that there are 313 dwellings with outline planning permission, 249 on large sites.

d) HELAA sites with full planning permission, but not yet commenced;

5. The HELAA identifies that there are 10,773 dwellings with full planning permission, although this includes sites where construction had been suspended and 6,621 dwellings that were currently under construction. The HELAA goes on to state that there were 2,530 dwellings on large sites with full planning permission that were not under construction and not on sites where construction has been suspended. It also suggests that there were 425 dwellings on small sites that had full planning permission and weren't on sites that were actively under construction.

e) Small windfall sites;

6. The HELAA has considered permissions granted on small sites between 2005 and 2022/23 and completions on small sites between 2008/9 and 2022/23. The average permissions granted was 371 dwellings, whilst the average number of dwellings completed was 227 dwellings. The Council suggests that it is reasonable to make an allowance for 200 new homes per annum on small sites. The Council suggests that there

¹ Table 122: housing supply; net additional dwellings, by local authority district
<https://www.gov.uk/government/statistical-data-sets/live-tables-on-net-supply-of-housing>

is no evidence to suggest that the level of small windfall sites will decrease, and suggests that the potential sources of supply include the conversion or redevelopment of non-residential buildings, sub-division of large houses; conversion of vacant floor spaces above shops and infill on small areas of unused land. Table 10 of the HELAA sets out the assumptions made in relation to small site windfalls, based on the small sites with planning permission as at 31/03/2023, the Council appears to have included an assumption that the small sites delivered will always average 200 dpa. Therefore, they have included an assumption that 88dpa will be delivered from windfalls in the years 2024/5 to 2027/8. They have then assumed the 200dpa continues for the remainder of the Plan period.

7. The HBF considers that any windfall allowance should only be included if compelling evidence is provided in line with the NPPF², and that it will not lead to double counting. The HBF recommends that any windfall, change of use or conversion allowance is not included within the first three years of the Plan, as it is likely that that would lead to double counting with existing permissions. Where small scale allocations are also included within the supply or where small-scale sites may be included within broad locations, the HBF would also expect these to have been taken in to consideration in terms of the windfall allowance identified.

f) Large windfall sites;

8. Table 9 of the HELAA identifies the annual large windfalls that have occurred between 2015/16 to 2022/23, this gives an average of 736 dwellings over the eight-year period, The Plan proposes an allowance of 4,675 windfalls on broad locations for Growth and windfalls on larger sites (10 or more dwellings) over the Plan period. It suggests that these sites are over and above the Site Allocations and windfalls on small sites, and that much of the additional developable supply is likely to be delivered after 2029. The HELAA states that the Council have included a large windfall estimate for years 6-10 and 11-15. It states that large site windfalls are not included in the 5-year supply as they cannot by definition be evidence as being deliverable using the definition in the NPPF. Table 10 of the HELAA sets out how the Council intend to deal with large site windfalls this appears to include an assumption that 468dpa will be delivered through large windfalls from 2029/30 onwards.
9. The HBF considers there is potential confusion here between broad locations for development and large windfall. The HBF is also concerned that there is potential for double counting and for over-estimation of the likelihood of these sites continuing to come forward. If these sites are windfall then the HBF considers that they should only be included if there is compelling evidence provided in line with the NPPF, and that there is certainty that they will continue to provide a reliable source of supply in future. 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. It also

² NPPF Sept 2023 paragraph 71 / Dec 2023 paragraph 72

suggests that there can be windfall within broad locations. The PPG³ states that a site or broad location can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated. It also states that when assessing whether sites / broad locations are likely to be developed that plan-makers will need to assess the suitability, availability and achievability of sites, including whether the site is economically viable⁴. It goes on to state that a standard set of outputs are expected and these include an assessment of each site or broad location including where these are considered suitable, available and achievable, the potential type and quantity of development, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when, and finally that these assessments will need to be made public⁵. Therefore, the HBF considers that if the Council wishes to consider these sites as broad locations that again there needs to be robust and detailed evidence to support their development, and to ensure that it does not include double counting.

g) Allocations within each Character Area or Sub-Area (inclusive and exclusive of Priority Locations and Catalyst Sites;

10. The HBF considers it is for the Council to provide the evidence which support the assumptions made about the density/capacity, lead-in times, timing, and annual delivery rates for the Character Areas and Sub-Areas.

11. The HBF notes that the Sub-Areas are:

- Central (18,284 dwellings - total taken from the Housing Trajectory);
- Chapeltown / High Green (23 dwellings);
- East Sheffield (3,111 dwgs);
- North East Sheffield (823 dwgs);
- North West Sheffield (854 dwgs);
- South East Sheffield (1,443 dwgs);
- South Sheffield (728 dwgs);
- South West Sheffield (854 dwgs); and
- Stocksbridge / Deepcar (914 dwgs).

12. Policy SA1 sets out the six Character Areas, five Priority Locations and three Catalyst Sites.

- The Character Areas are identified as
 1. Kelham Island, Neepsend, Philadelphia and Woodside;
 2. Castlegate, West Bar, The Wicker, Victoria;
 3. St Vincent's, Cathedral, St George's and University of Sheffield;
 4. City Arrival, Cultural Industries Quarter, Sheaf Valley
 5. Heart of the City, Division Street, Springfield, Milton Street, The Moor and Hanover Street; and
 6. London Road and Queen's Road.

³ PPG ID: 3-018-20190722

⁴ PPG ID: 3-017-20190722

⁵ PPG ID: 3-026-20190722

- The Priority Locations are: Neepsend; Wicker Riverside; Castlegate; Furnace Hill; and Moorfoot.
- The Catalyst Sites are: Between Penistone Road, the River Don and Rutland Road; Gateway between Scotland Street, Smithfield and Snow Lane; and the Junction between St Mary's Gateway, The Moor Street and London Road.

13. The Housing Trajectory (24/01/24) identifies supply by sub-area and character area, it is assumed these figures include the Priority Locations and Catalyst Sites.

h) Each Priority Location;

14. The HBF considers it is for the Council to provide the evidence which support the assumptions made about the density/capacity, lead-in times, timing, and annual delivery rates for the Priority Locations.

i) Each Catalyst Site;

15. The HBF considers it is for the Council to provide the evidence which support the assumptions made about the density/capacity, lead-in times, timing, and annual delivery rates for the Catalyst Sites

j) Each Broad Location for Growth;

16. The HBF considers it is for the Council to provide the evidence which support the assumptions made about the density/capacity, lead-in times, timing, and annual delivery rates for the Broad locations for Growth.

k) Any other sources of supply.

17. The HBF considers this is for the Council to identify.

18.3 Would there be an adequate supply of housing land throughout the Plan period to meet the Plan's requirement? Has sufficient land been identified to ensure that housing needs will be met, including an appropriate buffer for changing circumstances?

18. The 24/01/24 Housing Trajectory and Housing Land Supply suggests that there is a gross supply of 34,909 dwellings and 34,109 net supply of dwellings, between 2023/24 and 2038/39. The Sheffield Housing and Economic Land Availability Assessment (HELAA) (Dec 2023) states that 1,684 gross dwellings and 1,628 net dwellings were completed in Sheffield in 2022/23. This equates to 36,593 gross dwellings or 35,737 net homes.

19. Policy SP1 states that the Plan will deliver 35,530 new homes by 2039 (2,090dpa). This is only 207 dwellings less than the net supply and equates to less than a 1% buffer, assuming that all of the sites come forward and at the capacity that has been proposed in the Plan.

20. The HBF is concerned that this is not an adequate supply of housing land, particularly when you consider that the supply already includes both a small site and large site windfall allowance. The HBF does not consider that sufficient land has been identified to ensure that all of the housing needs are met, this applies not only to the quantum of

development but also to the range, variety and location of the supply. The HBF does not consider that the Council have provided an appropriate buffer for changing circumstances. In fact, the buffer is almost non-existent and as such it would only take one or two sites to not come forward for the Plan to not be able to deliver, or for a small change in circumstances for the Plan not to be able to deliver.

18.4 How is purpose built student accommodation and other forms of specialist housing factored into supply?

21. The HELAA appears to suggest that student housing will be included in the housing supply.

18.5 Regarding paragraph 69 of the Framework, would at least 10% of the housing requirement be from sites no larger than a hectare?

22. The Housing Trajectory 24/01/24 appears to show 253 sites of less than 1ha with a capacity for 16,827 homes. The HBF considers that this is in line with the requirements of the NPPF.

18.6 Has allowance been made for non-implementation or for estate demolitions? If so, is this justified?

23. The Housing Trajectory 24/01/24 appears to include an allowance for losses of 50 dpa. It is not clear how this allowance has been determined. For example, Table 12 of the HELAA identifies the losses through demolition, conversion and change of use and at Park Hill. Together these have an average of 295 losses per year, over the period 2004/5 to 2022/23, and without Park Hill these still average 248 losses per year.

24. The Housing Trajectory 24/01/24 does not appear to include any allowance for non-implementation or slippage.

18.7 The HELAA refers to sites where construction has been suspended (977 dwellings in Table 17). What are the sites' circumstances and how should they be considered as part of supply?

25. The HBF considers that it is for the Council to demonstrate that there is evidence that these sites will come forward within the Plan period, otherwise they should not be included.

18.8 With regard to paragraph 71 of the Framework, is there compelling evidence that the windfall allowances for large and small sites would represent a reliable source of housing supply? Does the approach to windfall sites avoid double-counting?

26. The HBF considers that there is not compelling evidence that the windfall allowances for large and small sites would represent a reliable source of housing supply. The HBF is also concerned that there may be opportunities for double counting of sites, and it is not clear what approaches the Council has taken to avoid this. As set out in our previous responses.

18.9 Would the Plan provide for a robust five year supply of deliverable housing land on Plan adoption?

27. The HBF does not consider that the Plan would provide for a robust five-year supply of housing land on adoption. The 5-Year Housing Land Supply Monitoring Report identifies the net 5-year requirement as 15,952 dwellings. Table 4 of the same document identifies a 5-year housing land supply (5YHLS) of 9,165 dwellings, equating to a supply of 2.87 years. It is noted that the 5YHLS in the Housing Trajectory 24/01/24 differs slightly at a supply of 9,123 dwellings, this would also reduce the 5YHLS slightly to 2.86 years.

28. The Plan proposes a housing requirement of 2,090dpa. Five years of this requirement would be 10,450 dwellings, if a 5% buffer is added this would add an additional 523 dwellings and give a total requirement of 10,973 dwellings. Using the identified supply from the 5YHLS Monitoring Report this equates to a 5YHLS of 4.18 years, and 4.15 years if using the Housing Trajectory.

18.10 What flexibility does the Plan provide if some of the larger sites do not come forward to the Council's estimated timescales?

29. The HBF considers that the Plan does not provide any flexibility if any of the larger sites do not come forward at the Council's estimated timescales.

18.11 Does the Plan identify a developable supply and/or broad locations in years 6 – 10 and, where possible, years 11 – 15 necessary to maintain continuity of deliverable supply?

30. The HBF considers that whilst numerically the Plan might identify a supply and / or broad locations for years 6-15, there is insufficient evidence within the Plan to determine if these sites are developable and will be brought forward within the Plan period.

18.12 Having regard to paragraph 74 of the Framework, what buffer should be used?

31. The NPPF⁶ makes it clear that a buffer is required as part of the supply of specific deliverable sites, the 5% requirement is the minimum requirement and applies where the Council is not wishing to demonstrate a five-year supply of deliverable sites through a recently adopted plan (where a 10% buffer would apply) and there has not been a significant under delivery of housing over the previous three years (where a 20% buffer would apply). The NPPF⁷ states that under delivery will be measured against the Housing Delivery Test (HDT), where this indicates that delivery was below 85% of the housing requirement. The 2022 HDT score for Sheffield was 121%, therefore the 20% buffer would not apply.

18.13 Should the Plan include a trajectory illustrating the expected rate of housing delivery over the Plan period?

32. The NPPF⁸ states that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the Plan period. Therefore, the HBF would expect the Plan to provide a trajectory.

⁶ Paragraph 74 of the NPPF Sept 2023

⁷ Footnote 41 of the NPPF Sept 2023

⁸ Paragraph 74 of the NPPF Sept 2023

18.14 Is it appropriate to include allocations within the Plan which have been completed since the beginning of the Plan period?

33. The HBF considers that it is unnecessary to include allocations that have been completed, and could cause confusion.

18.15 Are the 311 homes on site NWS09 within Barnsley Metropolitan Borough Council's area intended to contribute towards Sheffield's housing supply? Is this clearly set out in the Plan, agreed with Barnsley Metropolitan Borough Council, and is this justified?

34. The Housing Trajectory 24/01/24 appears to include the dwellings on this site within the supply. The HBF does not consider that this is clearly set out within the Plan, and does not consider that this is justified.

18.16 Is Policy H1 b) realistic in respect of brownfield land? Is this 85% of total supply?

35. The HBF considers this is a question for the Council.

18.17 Should the figures within Table 2 at Policy H1 be consistent with the housing figures set out within Policies SA1 – SA9?

36. The HBF would expect there to be consistency between Table 2 at Policy H1 and the housing figures set out within Policies SA1 -SA9.

18.18 Do the neighbourhood planning area housing figures in Policies CA1 b), SA7 b), SA8 b) and SA9 b) form part of the headline housing figures set out in criterion a) of each of those policies?

37. The HBF considers this is a question for the Council.