

Jenny Poxon
Head of Planning Delivery and Conformity
01924 331601
jenny.poxon@yhassembly.gov.uk

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Ben Benest
Principal Planning Officer
Sheffield City Council
Forward and Area Planning
Howden House
1 Union Street
Sheffield
S1 2SH

Dear Ben

**Sheffield Local Development Framework
City Policies, City Sites and Proposals Map: Preferred Options**

The Yorkshire and Humber Assembly welcomes the opportunity to comment on the Sheffield City Policies, City Sites and Proposals Map: Preferred Options and to continue its involvement in the development of a coherent spatial planning framework for the region. The comments offered in this letter are intended to be within the spirit of continued and productive joint working.

At this stage, the Assembly's response to the consultation document is a set of officer comments. The aim is to highlight where issues related to general conformity with the Regional Spatial Strategy might arise. When the City Policies, City Sites and Proposals Map is submitted to the Secretary of State a formal Assembly view on its general conformity with the Regional Spatial Strategy will need to be given.

The following officer comments are made in relation to the existing Regional Spatial Strategy for Yorkshire & the Humber (based on the selective review of RPG12 issued in December 2004) and the Draft Regional Spatial Strategy – the

Yorkshire and Humber Plan (submitted to the Secretary of State in December 2005).

The comments place emphasis on the draft Regional Spatial Strategy (RSS), which reinforces and develops the general thrust of existing RSS. It is also more up to date and is gathering 'weight' as it passes through the preparation process. The Panel Report of the Examination in Public of the Yorkshire and Humber Plan has now been published (May 2007). This contains recommendations to Government that may or may not be reflected in the Proposed Changes to the Plan that are due to be published for consultation in the summer. The Panel Report backs the Plan's overall approach and strategy. It also includes recommendations for changes or additions to policies. Any points from the Panel Report that are particularly relevant to this response are noted within the following paragraphs. The Yorkshire and Humber Plan should be published in early 2008.

General Conformity with the Regional Spatial Strategy

As you know, the Planning and Compulsory Purchase Act 2004 introduced mechanisms to help ensure that Development Plan Documents (DPDs) drawn up by local authorities as part of the Local Development Framework (LDF) are in general conformity with the Regional Spatial Strategy (RSS). The intention is to ensure that DPDs are contributing to the delivery of the RSS and that the two strands of the Development Plan for an area (the RSS and DPDs) are mutually supportive and not in conflict. We therefore welcome the reference in the introduction of the need for the DPD to be in general conformity with the RSS and the helpful references to the RSS that are made throughout the document.

Summary of comments

Overall, the City Policies, City Sites and Proposals Map: Preferred Options reflects the policy direction of current and draft RSS. In particular, the Assembly supports the Preferred Options on:

- Business and Industry (PB 1 and PB 2)
- Shopping and Built Leisure (PS 1 and PS4)
- Housing (PH 4 and PH 5)
- Historic Environment (PHE 5)
- Green Environment (PGE 1 and PGE 5)
- Natural Resources (PR 1, PR 5, PR 9, PR 10)
- Transport (PT 1 and PT 7)

The Assembly would wish to see changes to the City Policies, City Sites and Proposals Map to ensure that:

- there is reference to housing provision targets set out in draft RSS (2005)
- justification and approach to elements of the waste management help to meet RSS objectives
- there is reference to the accessibility criteria set out in current and draft RSS

These points are expanded on in Annex A.

I trust that these comments are helpful to you as you prepare the Sheffield City Policies, City Sites and Proposals Map: Preferred Options for submission to the Secretary of State. If you wish to discuss any of the points made here please do not hesitate to get in touch. We look forward to continuing to work with you on your Sheffield City Policies, City Sites and Proposals Map: Preferred Options.

Regards

A handwritten signature in blue ink, appearing to read 'Jenny Poxon', written in a cursive style.

Jenny Poxon
Head of Planning Delivery and Conformity

Annex A

Business and Industry

Preferred Option PB 1 and 2 place much emphasis on focussing office development in the city centre. This spatial approach to office development is fully supported by the Assembly. Both current and draft RSS seek to locate office uses in city or town centres. Policy E4 of current RSS (December 2004) specially states, "offices should be located in town and city centres". Policy E2 of draft RSS (December 2005) reinforces these principles by stating, "city and town centres will be the main focus for office...and other uses which generate a high level of people movements."

As stated above, the Panel Report (May 2007) considers 'that Policy E2 represents the most appropriate strategy for guiding new town centre type development' (paragraph 4.49, page 44).

Shopping and Built Leisure

The Assembly is encouraged by **Preferred Option PS 1** which provides for the Core Retail Area to be the City's Centre's primary shopping area where retail (A1) is the preferred use. This policy also provides for restaurants, leisure and cultural facilities to support the City Centre's vitality and attract visitors.

In the draft RSS (2005), Policy YH5 identifies Sheffield as a Regional Centre. This policy clearly states that these centres will be the prime focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities in the region. Policy E2 of draft RSS (December 2005) reinforces that city and town centres "will be the main focus for office, comparison shopping, health, education, casino, leisure, recreation, entertainment, cultural, public services, business services and other uses which generate a high level of people movements".

The Panel Report (May 2007) does not recommend changes to Policy YH5 and considers 'that Policy E2 represents the most appropriate strategy for guiding new town centre type development' (paragraph 4.49, page 44).

The Assembly is encouraged by **paragraph 5.12**, which makes reference to the Regional Spatial Strategy stating that any large-scale expansion at Meadowhall, including the cumulative effect of smaller extensions, is unacceptable. **Preferred Option PS 4** limits the amount of retail and leisure development that can take place at Meadowhall. The Assembly commented on the Core Strategy: Preferred Options on 6 April 2006, which highlighted concern that the Core Strategy indicated that where leisure and employment could not be located in the City it would then be appropriate to locate it at and around Meadowhall. The Assembly is

pleased that the Preferred Option provides for minor leisure and recreational facilities and only offices that are of the appropriate scale.

Housing

The Assembly is encouraged by **Preferred Option PH 4** which seeks to address the need for housing mix in Sheffield, requiring that 'on large housing sites (except in the City Centre), at least half the new homes should be family housing' and 'on medium sized sites, and in the City Centre, no more than half the new home should consist of a single house type'. Policy H4 in draft RSS (December 2005) emphasises the need for the current mix of housing in the Region to change so that it better supports the creation of more sustainable communities.

Current RSS (December 2004) encourages local authorities to set targets for the provision of affordable housing based on housing needs assessments (Policy H4). Draft RSS identifies Sheffield as an area of 'medium need' for affordable housing (based on the Regional Housing Strategy, 2005). Policy H3A of the draft RSS suggests that in areas of 'medium need' (including Sheffield) between 30 and 39% of homes (on sites of 15 homes or more) need to be affordable.

The Assembly recognises that the affordable housing provision set out in **Preferred Option PH 5** is not in accordance with the figures set out in Policy H3 of draft RSS (2005). However, it has been noted that at the Examination in Public Sheffield City Council expressed concern about delivering between 30% and 39% of affordable housing due to difficulties with the economics of PDL sites. The Panel Report (May 2007) acknowledges that Policy H3 should be reconsidered and should set out a forecast of affordable housing in each local authority or housing market area. The Assembly also understands the need for variable percentages in complex housing markets such as Sheffield.

It should be noted that the Panel Report (May 2007) recommends changes to Policy H3 and Policy H4 (see pages 80 – 85 and recommendations 5.9, 5.10 and 5.11).

The Assembly is encouraged by **paragraph 7.27**, which makes reference to the South Yorkshire Gypsy and Traveller Accommodation Needs Assessment, which indicated a shortfall of pitches for gypsies and travellers in Sheffield. Policy H5 of draft RSS (2005) encourages Local Authorities to carry out an assessment of the housing needs of Gypsies and Travellers, and through the Local Development Frameworks ensure there is an adequate provision of sites made available. The Panel Report (March 2007) accepts that there is an overall shortfall in provision for Gypsies and Travellers across the Region.

It should be noted that the Panel Report (May 2007) recommends changes to Policy H5 (see pages 76-78 and recommendation 5.6).

The Assembly is concerned that there is no reference to housing provision targets set out in the draft RSS (2005). Draft RSS (December 2005) sets an average annual net completion rate of 1025 dwellings for Sheffield between 2004-2011 and 2011-2016 and 1100 dwellings between 2016-2021. It is recognised that at the Examination in Public, Sheffield District Council made the case that the average annual net housing requirement for South Yorkshire should be increased to 3,925 dwellings per year over the period 2004-2021. The Panel Report (March 2007) makes the recommendation that the average net completions rate for Sheffield should be 1025 dwellings per annum between 2004-2011 and 1425 dwellings per annum between 2011-2016 and 2016-2021. Since the Panel Report was published in March 2007 a further round of projections from CLG confirm the upward trend in housing projections.

Waste Management

It is suggested that the supporting text of **Preferred Option PW3** be re-examined. The criteria for permitting waste development should include explicit reference to evaluating the need for facilities in the context of the waste hierarchy and the current "capacity gap" identified by RSS. Proposals will be evaluated by judging proposals against the RSS tonnage apportionments for recycling, recovery and landfill.

There are concerns that the justification for not allocating sites for non-MSW waste streams in **Paragraph 9.9** may not be robust. There really needs to be a statement that Sheffield City Council will take its "fair share" of Commercial & Industrial (C&I) and Hazardous waste management. However, because of the complete uncertainty over what management choices will be made over particular sub-streams of total C&I, it cannot be assumed that all, or even a significant part of the C&I arising in any given district will be managed there. Hence, "generic" sites need to be allocated.

This points to some clear upfront messages about meeting RSS tonnage apportionments for non-MSW waste streams. Given that it seems reasonable to allow for at least a 50% margin for loss, choice and uncertainty in sites, there needs to be the will to allocate several sites, and back this up with the suggested criteria based approaches for other employment land.

Historic Environment

Policy N2 of current RSS (2004) provides for the preservation and enhancement of the historic environment. Policy ENV9 of draft RSS (2005) provides for the Region to safeguard and enhance the historic environment, and also places emphasis on the protection of industrial landscapes, housing areas and civic buildings especially

in South Yorkshire. The Assembly is pleased to see that **Preferred Option PHE 5** encourages the retention and protection of historic buildings from development.

It should be noted that the Panel Report (March 2007) recommends changes to Policy ENV9 (see pages 109 – 112 and recommendation 6.8).

Green Environment

The Assembly is encouraged by **paragraph 14.6** that makes reference to draft RSS (2005), which advises that development plans should 'retain and incorporate biodiversity in development'. **Preferred Option PGE 1** clearly reflects Policy ENV8 of draft RSS (2005).

It should be noted that the Panel Report (March 2007) recommends changes to Policy ENV8 (see pages 109 – 111 and recommendation 6.8).

Policy ENV6 of draft RSS (2005) encourages all development plans, strategies, programmes and decisions to identify, safeguard and enhance ancient woodlands especially in South Yorkshire. **Preferred Option PGE 5** is welcomed as it is clearly accords with Policy ENV6 of draft RSS (2005).

Natural Resources

The Assembly is encouraged by **paragraphs 15.1 and 15.5**, which both make reference to the draft RSS (2005), advising that development should be avoided in areas of high flood risk and that flood management will be required to provide flood storage. **Preferred Option PR1** is supported as it aims to reduce flood risk and avoid building in areas where flood risk is deemed unacceptable. Current RSS (Policy R2) states that a sequential risk-based approach to planning for flood risk should be taken and that development in high flood risk areas should be avoided. Draft RSS policy (Policy ENV1) states that development in high flood risk areas should be avoided where possible and flood management should be undertaken pro-actively. ENV1 of draft RSS (December 2005) specifies that flood management will be required to facilitate development in the city of Sheffield.

It should be noted that the Panel Report (May 2007) recommends changes to Policy ENV1 (see pages 104 – 107 and recommendation 6.6).

Paragraph 15.16 is welcomed as to the reference to the draft RSS (2005) which provides for development strategies, plans and decisions which minimise development that could pollute surface and underground water resources. The Assembly is encouraged by **Preferred Option PR 5** that seeks to ensure that development does not harm the quality or quantity of water resources.

The sustainable use of resources is a key theme of both current and draft RSS. Policy S6 of current RSS encourages new development to maximise energy efficiency and minimise resource demand. The Assembly welcomes **Preferred Option PR 9**, which provides for all developments being required to achieve a high standard of energy efficiency using passive solar design principles; and make the best use of solar energy, passive heating and cooling, natural light, natural ventilation and renewable energy resources. This preferred option clearly reflects Policy ENV5A of draft RSS (2005).

Preferred Option PR 10 provides for all significant developments, whether new-build or conversion will be required to generate renewable energy to provide at least 20% of predicted energy needs on-site. Policy ENV5 B iii) of draft RSS requires at least 10% of the energy to be used in sizeable new development is to come from on-site renewable energy sources. The Assembly is encouraged that **Preferred Option PR 10** goes further than Policy ENV5 B iii) in draft RSS (December 2005) as it will help to implement RSS objectives.

The Panel Report (May 2007) recommends that Policy ENV5 should be applied to developments of 10 houses or more (see pages 102 – 103 and recommendation 6.5).

Transport

The Assembly is encouraged by **paragraph 16.3**, which makes reference that the RSS requires the use of Travel Plans to reduce congestion. The Assembly welcomes **Preferred Option PT 1** as it clearly reflects the overarching spatial vision of the RSS. It is perhaps worth mentioning that there is no specific detailed information on Travel Plans in the draft RSS (2005) as these are a local issue and national guidance is provided on these plans.

Preferred Option PT 7 is welcomed. This policy applies more stringent parking controls than those set out in the RSS. The Assembly is encouraged that this policy goes further than Policy T2 in draft RSS (December 2005) as it will help to implement RSS objectives.

It should be noted that the Panel Report (May 2007) recommends changes to Policy T2 (see pages 142 – 143 and recommendation 8.6).

The Assembly is concerned that there is no reference in this document to the accessibility criteria set out in the RSS. Ensuring the accessibility of development by non-car modes is a key principle of regional planning policy. Accessibility criteria are set out in both the current and draft RSS (Table 7.1 and 7.2 of current RSS and Table 16.8 and 16.9 of draft RSS) and they provide guidance for developments in terms of their accessibility to employment and social infrastructure uses.

It should be noted that the Panel Report (March 2007) makes no recommendations with regard to these criteria.