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Our ref: Sheffield/40b – Planning Conformity/Final responses/Sheffield Core Strategy Submission Nov 07

8 November 2007

Ben Benest  
Principal Planning Officer  
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Dear Ben

### **Sheffield Development Framework: Core Strategy – Submission Version**

Further to your letter of 25 September 2007, I am pleased to confirm the Assembly's opinion that the Sheffield Core Strategy Development Plan Document, as submitted to the Secretary of State on 28 September 2007, is in general conformity with the existing and draft Regional Spatial Strategy and the Secretary of State's Proposed Changes to the Regional Spatial Strategy (RSS).

Paragraph 4.19 of PPS12 (Local Development Frameworks) makes it clear that an RSS under preparation gathers more weight as it passes through its preparation process. It states "Where the regional spatial strategy has been through an Examination in Public, and the Proposed Changes have been published, considerable weight may be attached to that strategy because of the strong possibility that it will be published in that form by the Secretary of State". The Assembly has therefore referred to the Proposed Changes to the Draft RSS (published at the end of September 2007) in this response but would like to make it clear that the Assembly will be commenting on the Proposed Changes and that final RSS is expected to be published in Spring 2008.

At this stage in the document's development, the Assembly would like the following comments to be taken into account.

### *Need for General Conformity*

The RSS has an important role in providing a strategic policy context for local policies. The need for there to be 'general conformity' between the RSS and the Local Development Framework is explained at the start of the Core Strategy.

Throughout the document references are made to the RSS but it is not clear whether these refer to current or draft RSS. It would be helpful if the dates and status of the current and draft RSS were explained in the introduction of the DPD. For clarification, current RSS was published in December 2004 and draft RSS was published in December 2005. The Panel Report of the Examination in Public of the RSS was published in May 2007 and the Government's Proposed Changes was published on 28 September 2007. The Yorkshire and Humber Plan is due to be published in early 2008.

### *Land for Employment and Economic Development*

The Assembly welcomes Policy **SB1 Land for Employment and Economic Development**. In comments made in the response to the Core Strategy: Preferred Options and Additional Options it was considered that this could better reflect draft RSS (2005) by citing the approach to employment land reviews set out in current and draft RSS (Policy E3), including the commitment to reallocate (or potentially deallocate) employment land found to be unsuitable for modern economic uses or in unsustainable locations. The Secretary of State's Proposed Changes reinforce this requirement (Policy E3).

### *Locations for Office Development*

**Policy SB 3** states the locations of where office development will take place, these locations being the city centre, in accessible locations at the edge of the City Centre, around Meadowhall, around Hillsborough and Crystal Peaks transport interchanges, Tinsley Park and in district centres on high-frequency public transport routes in urban areas and near Supertram stops. The Assembly wishes to raise concerns to this spatial approach to office development. Both current and draft RSS seek to locate office uses in city or town centres. Policy E4 of current RSS (December 2004) specifically 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." Proposed Changes to RSS Policy E2 maintains this overall approach. While the Policy suggests that the City

Centre and its edge will provide for at least 65% of total office development, it is considered that this should be more explicitly tied to a sequential test approach.

### *Meadowhall*

The Assembly's response to the Core Strategy Preferred Options welcomed the message that there will be no significant retail expansion at the Meadowhall centre as it accords with both existing and draft RSS. The Assembly is encouraged that **Policy SS1** states "Meadowhall Shopping Centre will remain at around its present size". Policy E2 Bi of draft RSS (2005) states that no further development or large-scale expansion of out-of-centre regional or sub-regional shopping centres, including Meadowhall should be permitted. It should be noted that the Secretary of State's Proposed Changes to draft RSS (2007) recommends that "no further development of new, or expansion of existing, out-of centre regional or sub-regional shopping centres should be permitted".

In its previous response, the Assembly did express concerns that preferred option PS5 indicated that where employment could not be accommodated in the City Centre it would be appropriate to locate it in and around Meadowhall. The Assembly is concerned that **Policy SB 3** states that office development will take place around Meadowhall without caveat.

### *Housing*

The Assembly has concerns with the housing figures provided in **Policy SH 1** as the figures increase from 1,425 dwellings per year over the period 2004/05 to 2010/11 to 1,825 dwelling per year within the time period 2011/12 to 2015/16. The figure then decreases to 1,425 dwellings per year over the time period 2016/17 to 2025/26. This is not in accordance with draft RSS (December 2005) or the Secretary of State's Proposed Changes to Draft RSS (September 2007). Draft RSS (2005) sets an average annual completion rate of 1025 dwellings for Sheffield between 2004-11 and 2011-2016 and 1100 dwellings between 2016-2021. It should be noted that the Secretary of State's Proposed Changes to draft RSS recommends an annual average net addition of 1025 dwellings between 2004-2008 and 1425 dwellings between 2008-2026.

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

The Assembly is encouraged by **paragraph 8.18** which makes reference to the affordable housing targets set out in the draft RSS (2005) that between 30 and

39% of new homes on medium and large developments should be affordable. It is also stated that these figures need to be reviewed in the light of the forthcoming local Housing Market Assessment 2007. It should be noted that the forthcoming Strategic Housing Assessment to be undertaken by Ecotec should provide the evidence needed to support Sheffield's affordable housing targets. The Secretary of State's Proposed Changes to draft RSS (2007) recommends that LDFs should set targets for the amount of affordable housing to be provided. Provisional estimates of the proportion of new housing that may need to be affordable in Sheffield are between 30 and 40%.

In the Assembly's responses to the Core Strategy: Additional Options, the Assembly encouraged the inclusion of Additional Option AH2 that provided for sufficient permanent sites to be made available to accommodate Gypsies and Travellers. The Assembly welcomes Policy SH8 in the Core Strategy Submission Draft, which ensures sufficient sites for Gypsies and Travellers will be provided for. The Secretary of State's Proposed Changes to draft RSS recommends that the Region needs to make additional provision to meet the housing needs of Gypsies and Travellers to address an overall shortfall of at least 255 pitches. In the South Yorkshire sub region at least 78 pitches will be required by 2010 to address the shortfall in the Region. The Proposed Changes also requires local authorities to carry out an assessment of the housing needs of Gypsies and Travellers by July 2008.

### *Environment*

The sustainable use of resources is a key theme of both current and draft RSS. Policy P6 of current RSS encourages new development to maximise energy efficiency and minimise resource demand. Policy ENV5 of draft RSS (December 2005) requires at least 10% of energy to be used in sizeable new development to come from on-site renewable energy sources. The Assembly welcomes **Policy SE 5**, which encourages local small-scale generation and requires developments to generate their own energy from renewable energy sources. It should be noted that the Proposed Changes recommends that the 10% target is removed from the RSS Policy but requires Development Plan Documents to set an appropriate local target for on-site renewable energy generation, bearing in mind the 10% standard and considering how they can expect far greater percentages where it is feasible and viable (RSS Proposed Changes Paragraph 15.37A)

The Assembly welcomes **Policy SE 5**, which states that the renewable energy capacity in the city will exceed 12 MW by 2010 and 60 MW by 2021. Draft RSS Policy ENV5 sets an indicative renewable energy generation target for Sheffield of 10.6MW to 2010. It should be noted that the Secretary of State's Proposed Changes to draft RSS recommend a renewable energy target in Sheffield of 11MW to 2010 and 52MW to 2021. Therefore encouragingly the indicative renewable

energy targets set out in the Core Strategy exceed those set in draft RSS and the Secretary of State's Proposed Changes.

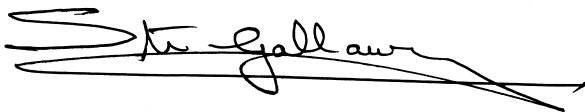
*Travel*

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. The Secretary of State's Proposed Changes to the RSS amends policy YH8 of the Core Approach to reinforce and further strengthen this requirement.

At this stage, the Assembly would be happy for the points made here to be dealt with by written representations at the Examination of the Sheffield Core Strategy DPD. We are happy to have discussions with you if this would help to clarify any issues prior to the Examination of the Core Strategy DPD.

If you have any queries about these points, please do not hesitate to contact Jenny Poxon on 01924 331 555.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Stephen Galloway', with a long horizontal flourish extending to the right.

Cllr. Stephen Galloway  
Chair, Regional Planning Board