PART A - Initial Impact Assessment

Proposal Name:	Sheffield Plan – Proposed Additional Site Allocations
EIA ID:	3122
EIA Author:	Simon Vincent
Approval Status:	Approved

Proposal Outline:

This Assessment relates to the Sheffield Local Plan and revises the previous EIA(s) that was most recently updated in July 2023. The associated report and appendices to which this EIA relates set out potential changes to the Sheffield Plan that was submitted to the Government for public examination in October 2023. They set out the recommended Council response to the Sheffield Plan Inspectors' request for the Council to identify additional land for new homes and employment use. The Inspectors wrote to the Council on 6th February 2025 to set out their views on those issues following completion of the first two stages of public examination hearings held in 2024. The main body of the report explains the Inspectors' concerns, sets out the methodology that has been used to identify additional land and puts forward a recommended list of potential additional site allocations for housing and employment on greenfield land in the Green Belt, which represents a different spatial approach to the original Sheffield Plan. The additional sites provide the quantum of land required to enable the Plan to be found sound by the Inspectors. The report/work also updates different Submission Documents, including the Integrated Impact Assessment which is a further tool that allows us to consider equality impacts. The proposed changes to the Sheffield Plan will require approval by full Council. If the list of sites is approved, the sites would be subject to a 6-week consultation period, alongside the relevant Submission Documents. The list of sites, together with the submission documents, and any representations received, would then be passed to the Inspectors examining the Sheffield Plan. Public hearings would be held in the autumn to consider whether the additional allocations are sound. Anyone who made a representation as part of the public consultation would have a right to present evidence and appear at the hearings. It is anticipated that the Inspectors will propose a series of Main Modifications to the Sheffield Plan which will be subject to further public consultation early in 2026. Those Modifications may or may not include the additional allocations put forward in this report; it will depend on the evidence presented to the examination. Following consultation on the Main Modifications, the Inspectors will issue their final report. The Council will be required to consider their recommendations and decide whether to adopt the Sheffield Plan -

	now expected to be by July 2026. This EIA updates the previous EIA's undertaken prior to the Publication Draft Sheffield Plan being submitted to the Government for public examination.
Proposal Type:	Non-Budget
Year Of Proposal:	25/26
Lead Director for proposal:	Kate Martin
Service Area:	Planning Service
EIA Start Date:	23/04/2025
Lead Equality Objective:	Break the cycle and improve life chances
Equality Lead Officer:	Louise Nunn

Decision Type

Committees:	Policy Committees • Strategy & Resources

Portfolio

Primary Portfolio:	City Futures	
EIA is cross portfolio:	Yes	City Futures
EIA is joint with another organisation:	No	

Overview of Impact

Overview Summery:

The Draft Sheffield Plan will have an overall positive impact, will support the duty to enhance equality of opportunity and will not result in discrimination of any equality impact group. There would be minimum impact on all protected characteristic groups as a result of aiming to achieve the housing growth and economic growth required by the city, whilst trying to enable choice and opportunity. However, achieving the level of growth set out in the Draft Sheffield Plan potentially has massive equality benefits for a large number of people through the provision of more, better quality homes and the provision of new jobs. The proposed additional allocations will provide more land for homes and jobs. In particular, this should lead to the provision of more affordable housing and a wider choice of house types. It could also help to attract new businesses with associated training opportunities to support new skills. The Cooperative Executive advised on the overall spatial strategy in February 2022. At that point it was emphasised that there are some potentially negative equality impacts of pursuing a growth strategy that does not allow any release of greenfield sites in the Green Belt. Limiting development to the existing urban areas (with no outward expansion of the built-up areas) meant that levels of growth would be restricted in some areas. In particular, this is likely to reduce choice in the context of housing and employment opportunities and the overall number of affordable homes that can be delivered (because it is generally more viable to provide affordable housing on greenfield sites). The additional site allocations now proposed would result in the release of greenfield Green Belt land and go a considerable way towards reducing the negative impacts that were previously identified with respect to such matters. . More generally, the decision to focus so much new growth in the Central Sub-Area is likely to disproportionately impact BAME communities who are more concentrated there. We have therefore developed policies to ensure suitable mitigation and infrastructure is provided to help counter negative impacts. For example, whilst new development is potentially beneficial (in terms of access to new homes and jobs, etc), it needs to be supported by sufficient community services and facilities. Attention is drawn to the following policies which are expected to have positive equalities impacts: • Policies SP1 and SP2 – promote new employment opportunities to meet future needs of the working age population • Policy NC3 - requires provision of affordable housing on larger housing sites where economically viable • Policy NC4 – 100% of new homes to be accessible and adaptable and, in larger developments (50 or more new homes), 2% to be wheelchair adaptable or accessible dwellings • Policy NC4 - specialist housing designated for older or disabled people is promoted in areas of need; all such homes must be fully wheelchair accessible • Policies H1 and NC7 – provision of accommodation for Gypsies & Travellers (including Travelling Showpeople) • Policy NC11 - acceptable walking distances to local

services and facilities varied to take account of the mobility of the intended residents • Policy NC12 – controls over new hot-food takeaways close to secondary schools • Policy NC15 – new open space including provision for children on new housing developments • Policy EC7 - encourages the provision of jobs for local people • Policy CO2 Parking Guidelines – accessible parking required for disabled people • Policy DE3 – entrances to buildings to be accessible, avoiding the need for separate arrangements • Policy DE4 – spaces around and between buildings to be inclusive and dementia friendly • Policy DE5 - roads, pedestrian routes and areas, cycleways, and public spaces to adhere to the principles of inclusive design The forecast future demographic changes will create some significant challenges for the city. In particular, the number of older people is expected to rise by 20% by 2035 meaning there will be major demands on health facilities, social care and housing. In the Sheffield Plan, we seek to address these problems where it is possible to do so through new development. Providing a greater choice of sites/homes will be beneficial in this respect. The infrastructure implications of the additional site allocations have been taken into account as part of the site selection process and amendments are being made to the Infrastructure Delivery Plan to reflect the assessments.

Impacted characteristics:

- Age
- Disability
- Carers
- Cohesion
- Health
- Partners
- Poverty & Financial Inclusion
- Pregnancy/Maternity
- Race
- Voluntary/Community & Faith Sectors

Impacted local area(s): North, South East, South West

Consultation and other engagement

Is consultation or other engagement required: Yes

The Council has been asked by the Local Plan Inspectors to identify additional land for new homes and employment within the envelope of the Plan examination. The sites listed in the report have not previously been considered for formal allocation within the Plan, so public consultation on the recommended sites now needs to take place for 6-weeks in accordance with the Council's

Statement of Community Involvement. Consultation is also required in respect to the updated Submission Documents including the Integrated Impact Assessment. Consultation on the Publication Draft Sheffield Plan took place between 9th January and 20th February 2023. This followed consultation previously undertaken on 'Issues and Options' between November 2015 and January 2016 and September to October 2020. An EIA was carried out for the Issues and Options document and in relation to a report to the Co-operative Executive on the spatial options in February 2022. The EIA was updated in advance of publishing the Publication Draft Plan, and again before the Plan was submitted to the Government for public examination. The previous EIAs noted that the Local Plan is primarily concerned with the development and use of land but will have significant benefits in terms of advancing equality of opportunity. It will support economic growth and job creation, with a specific objective to increase the number of higher paid jobs and raise average incomes. It will help increase the supply of new homes, including affordable homes, homes for disabled people, homes for older people and sites for Gypsies and Travellers. The plan will help to deliver and support essential infrastructure - providing land for schools, health facilities, open space and other local services. It will also have positive impacts in terms of transport and travel – supporting enhancement of, and access to, public transport and promoting active travel (with associated health benefits). Better design and place-making can provide opportunities for communities to meet and interact, fostering better relations. The purpose of the consultation on the Draft Plan in January/ February 2023 was to assess whether it is 'sound'. The soundness tests are set out in national planning policy – a local plan has to be positively prepared, justified, effective and be consistent with national planning. The further consultation now planned will pose the same questions in relation to the soundness of the proposals. The Publication Draft Sheffield Plan is the subject of public consultation in accordance with National Planning Regulations and the Statement of Community Involvement (SCI) (July 2020). The further consultation now planned will also be undertaken in accordance with the SCI.

Cumulative Impact

Does the proposal have a cumulative impact:	Yes

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	the Council's Statement of Community Involvement. Consultation is also required in respect to the updated Submission Documents including the Integrated Impact Assessment. Consultation on the Publication Draft Sheffield Plan took place between 9th January and 20th February 2023. This followed consultation previously undertaken on 'Issues and Options' between November 2015 and January 2016 and September to October 2020. An EIA was carried out for the Issues and Options document and in relation to a report to the Co-operative Executive on the spatial options in February 2022. The EIA was updated in advance of publishing the Publication Draft Plan, and again before the Plan was submitted to the Government for public examination. The previous EIAs noted that the Local Plan is primarily concerned with the development and use of land but will have significant benefits in terms of advancing equality of opportunity. It will support economic growth and job creation, with a specific objective to increase the number of higher paid jobs and raise average incomes. It will help increase the supply of new homes, including affordable homes, homes for disabled people, homes for older people and sites for Gypsies and Travellers. The plan will help to deliver and support essential infrastructure - providing land for schools, health facilities, open space and other local services. It will also have positive impacts in terms of transport and travel – supporting enhancement of, and access to, public transport and promoting active travel (with associated health benefits). Better design and place-making can provide opportunities for communities to meet and interact, fostering better relations. The purpose of the consultation on the Draft Plan in January/ February 2023 was to assess whether it is 'sound'. The soundness tests are set out in national planning policy – a local plan has to be positively prepared, justified, effective and be consistent with national planning. The further consultation now planned will pose the same questions in relation to the soundness of the proposals. The Publication Draft Sheffield Plan is the subject of public consultation in accordance with National Planning Regulations and the Statement of Community Involvement (SCI) (July 2020). The further consultation now planned will also be undertaken in accordance with the SCI.
Impact areas:	Year on Year, Across a Community of Identity/Interest, Geographical Area

Initial Sign-Off

Full impact assessment required:	Yes

Review Date: 17/07/2025

PART B - Full Impact Assessment

Health

Staff Impacted: No

Customers Impacted: Yes

Description of Impact: There were four main aspects to how the previous spatial approach impacted on health: • whether new development will take place in areas with poor air quality and whether it could increase vehicular emissions of harmful gases; • related to (a) whether the location of development would enable and encourage more active travel (walking and cycling) but also reduce vehicular emissions • whether new homes would be built where there is good access to open space and where there are opportunities for recreation – affecting both mental and physical health • whether it can help to reduce child obesity by limiting the number of hot-food takeaways The spatial strategy still seeks to maximise the use of brownfield sites within the existing urban areas, especially within the Central Area of Sheffield (where 18,600 new homes are proposed, as well as significant office, retail and leisure development). The proposed additional site allocations will however lead to more development on sites in the Green Belt on the edge of the existing built-up areas where development is likely to be more car dependent and travel distances to jobs and services are likely to be greater. However, this will vary from location to location and the proposed sites have been focussed in locations with the best access to public transport. People living in the Central Area and eastern side of the city are more likely to experience poorer air quality overall but the Central Area also offers greater opportunities to make trips on foot or by cycle. The Clean Air Zone and various transport initiatives are seeking to tackle air quality problems and provide more attractive alternatives to diesel and petrol vehicles. Over the period covered by the Local Plan, the switch to electrical vehicles should lead to marked improvements in air quality. A number of the development management policies include criteria that support active travel or use of public transport: • Policy NC1: Principles Guiding the Development of Strategic Housing Sites – promotes the creation of ‘walkable neighbourhoods’; • Policy NC7: Criteria for Assessing New Gypsy and Traveller and Travelling Showpeople Sites – sites required to be within easy

	walking distance of a bus or tram stop on a route providing the minimum service frequency standard; • Policy NC9: Housing Density – promotes higher densities (and therefore more people) in the most accessible locations; • Policy NC10: Development in District and Local Centres – identified as the focus for the creation of '20-minute neighbourhoods where most of peoples' daily needs can be met within a 10-minute walk or cycle ride; • Policy NC11: Access to Key Local Services and Community Facilities in New Residential Developments – accessibility standards set out for access to public transport and local services and facilities for development of 10 or more new homes; • Policy CO1: Development and Trip Generation - includes provisions and incentives to increase sustainable and active travel and reduce reliance on the car • Policy CO2: Parking Provision in New Development – residential development in the Central Sub-Area should be car-free or provide 1 space per dwelling where a need can be demonstrated. Also covers provision for cycle parking and facilities for zero emission vehicles. Access to recreational open space will also vary according to location. People living in the Central Area will generally have poorer access to open space than those living in suburban areas or on the edge of the built-up area. However, new open space or public spaces are already being delivered in the central area, and more are planned in several of the Priority Locations for development in the Central Area. The availability of open space in different locations has been assessed as part of the detailed site selection process. On-site open space is usually required in new housing developments of 100 or more new homes, except where it is not practical to do so (though in such cases a contribution to off-site provision will be required). Developments on greenfield Green Belt land will also be subject to the 'Golden Rules' that were introduced in the December 2024 NPPF – these require the provision of new or enhanced open space as part of the development. The plan includes a specific policy (NC12) that seeks to limit the number of hot-food takeaways close to secondary schools. This is part of the Council's Food Strategy which seeks to reduce levels of obesity and associated ill health, enabling children and the wider community to make healthier food choices.
Name of Lead Health Officer:	
Comprehensive Assessment Being Completed:	No
Public Health Lead signed off health impact(s):	

Age

Staff Impacted: No

Customers Impacted: Yes

Description of Impact: The decision on where and how much previously undeveloped/Green Belt land to release for development is likely to impact on the type and affordability of housing that is provided. It is likely to be more economically viable to provide affordable homes on greenfield sites. So, providing more greenfield land for development is likely to benefit younger people (and other households) on lower incomes. Developments on Green Belt land will also be subject to the 'Golden Rules' that were introduced in the December 2024 NPPF – these require the provision of higher levels on affordable housing than on non-Green Belt sites. The new proposed site allocations will also ensure a greater choice of housing in different parts of the city and this could include specific housing for older people. The decision on whether to release greenfield land for development has been balanced with the need to promote more sustainable patterns of development (in response to the Climate and Biodiversity Emergencies). The majority of development will still take place on brownfield land in the urban area. In the context of the polices set out in the Plan, Policy NC4 Housing for Independent and Supported Living – promotes the provision of specialist housing for older or disabled people in areas of need. We have proposed an amendment to this policy which states that proposals will be acceptable where the accommodation would be close to local facilities, particularly public transport, shops, and health services. The Draft Plan includes a number of references to development being dementia-friendly: • Policy NC1 Principles Guiding the Development of Strategic Housing Sites – development to be designed to be a 'lifetime neighbourhood' and dementia-friendly' • Policy NC15 – requires new open space to be publicly accessible, safe and follow the principles of inclusive and dementia friendly design • Policy DE3 Public Realm and Landscape Design – states that landscaping proposals should be inclusive, dementia friendly, improve vitality and safety, and encourage active and healthy lifestyles • Policy DE4 Design of Streets, Roads and Parking – states that they should adhere to the principles of inclusive and dementia friendly design

Carers

Staff Impacted:	Yes
Customers Impacted:	Yes
Description of Impact:	The location of development will affect the ease with which staff providing care can reach their customers by different modes of transport. Access to sites by different modes has been assessed as part of the site selection process. Concentrating most of the future development in the existing urban areas and maintaining a compact city means that development is more likely to be well-served by public transport (although this will vary depending on the location). The proposed additional site allocations have been focussed in locations with the best access to public transport.

Care Experienced

Staff Impacted:	
Customers Impacted:	
Description of Impact:	

Cohesion

Staff Impacted:	No
Customers Impacted:	No
Description of Impact:	

Disability

Staff Impacted:	No
Customers Impacted:	Yes

Description of Impact:	The location of new development will affect the ease with which disabled people are able to travel to local services and facilities. However, this will vary from location to location depending on the distances involved and access to public transport. These matters have been considered fully through the detailed site selection process. A large proportion of the housing that is proposed in the Central Area is likely to be apartments and much of that is likely to have limited or no off-street parking. This would potentially disadvantage disabled people who require a car for their mobility. This could, however, be mitigated by ensuring that new developments comply with the Parking Guidelines ensuring that appropriate parking provision is provided for disabled people. We have proposed an amendment to the Parking Guidelines in Annex B in relation to car free housing development which makes it clear that provision will be required for disabled parking in the Central Area. Many disabled people also have lower incomes so providing more greenfield land for development in the Green Belt potentially benefits disabled people by increasing the supply of affordable homes (see comments in relation to Age above). Allowing some previously undeveloped land in the urban areas to be developed potentially further increases the supply of affordable housing but the impact is quite limited. Under the Draft Plan (Policy NC4) all new homes will be required to be 'accessible and adaptable' (complying with Building Regulations M4(2)). 2% of homes on developments of 50 or more new homes will be required to be wheelchair adaptable or accessible. There is some concern that this figure is too low and schemes of 49 homes or less would not be required to provide wheelchair adaptable or accessible homes. However, setting the requirement any higher would reduce the number of affordable homes that can be delivered. Affordable housing can be more readily targeted at those people who require wheelchair accessible housing (whereas there is no guarantee that wheelchair adaptable homes provided in market housing schemes will be purchased by someone who needs such housing. Nationally, 1.9% of households include someone who uses a wheelchair. The additional sites are generally larger than 50 units and therefore ensure greater provision of wheelchair adaptable or accessible housing. The proposed amendment to Policy NC4 (referred to under 'Age' above) should improve development outcomes for older people.

Partners

Staff Impacted:	No
Customers Impacted:	Yes

Description of Impact:	The Draft Plan provides a framework for determining planning applications in all areas of the city and for all types of development. In that sense the Plan will provided certainty and also impact on the development proposals from a range of different partners (in particular, the universities, Registered Providers (or affordable housing) and a wide range of community organisations). The Plan includes a policy which seeks to safeguard assets of community value.

Poverty & Financial Inclusion

Staff Impacted:	No
Customers Impacted:	Yes
Description of Impact:	The Sheffield Plan aims to create around 2,550 new jobs per year over the period 2022-2039, although whether this is achieved will depend to a considerable extent on wider economic conditions. The plan provides land for office, general industrial uses, and large scale logistics. Particular emphasis is placed on delivering developments in the Innovation District that will deliver better paid jobs. The proposed additional employment allocations will provide a wider choice of employment sites that should attract new businesses and create more jobs, though there is no guarantee that these will be better paid jobs. The employment sites are generally located close to residential areas that have higher levels of people on lower incomes. Policy EC7 ‘Promoting Local Employment in Development’ recognises that new development often takes place in areas of high deprivation and there is a danger that the benefits of development are not fairly shared with these local residents. The Policy therefore expects local sustainable employment to be secured by major employment-generating developments providing employment and training opportunities, to be taken up by local people during both the construction phase and, when practical, the occupation phase. The Draft Plan is therefore beneficial in terms of providing employment opportunities.

Pregnancy / Maternity

Staff Impacted:	No
Customers Impacted:	No

Description of Impact:

Race

Staff Impacted: No

Customers Impacted: Yes

Description of Impact: The Draft Sheffield Plan seeks to maximise the use of brownfield sites within the existing urban areas, especially within the Central Area of Sheffield (where over 18,600 new homes are proposed and significant office, retail and leisure development). Given that many of the brownfield sites are concentrated in the central area and east of Sheffield where there are significant BAME communities, new development should benefit these communities through employment and housing opportunities. Also see Health and Poverty & Inclusion sections. We have developed policies (e.g. policies IN1 'Infrastructure Provision' and DC1 'The Community Infrastructure Levy (CIL) and other Developer Contributions') to ensure suitable mitigation and infrastructure is provided to help counter any negative impacts of development being concentrated in these locations. For example, whilst new development is potentially beneficial (in terms of access to new homes and jobs, etc), it needs to be supported by sufficient community services and facilities. The largest number of objections to the Publication Draft Sheffield Plan were in relation to the proposed employment and gypsy and traveller site at Eckington Way (Site Allocation SES03). Our conclusion is that there are no valid planning reasons for not allocating this site; the Council has a statutory responsibility to provide for Gypsies and Travellers. Gypsies and Travellers have the same right to have their housing needs met as anyone else. The site is close to local services, shops and facilities, so is a sustainable location to live. A failure to allocate sufficient sites for Gypsies and Travellers would have a serious negative impact on that community.

Voluntary / Community & Faith Sectors

Staff Impacted: No

Customers Impacted: No

Description of Impact:

Action Plan & Supporting Evidence

Outline of action plan:

Public consultation on the proposed additional site allocations and updated Submission Documents will have the equivalent scope and duration as the consultation on the Draft Plan at the Regulation 19 stage. As part of the consultation exercise, emails or letters will be sent to all the organisations, businesses and individuals who are registered on the Sheffield Plan database, alerting them to the start of the consultation. The consultation will also be publicised through social media and through Local Area Committee (LAC) mailings. A range of meetings and drop-in sessions will held during the consultation period, including presentations and/or staffed exhibitions in all the affected LACs. Consultation will include proactive contact with organisations representing people with protected characteristics: As part of previous consultations amendments to the Plan have been proposed in response to representations, including from the Access Liaison Group. However, changes to the Plan were not proposed where the change proposed was not necessary to make the Plan sound or where it would result in the Plan being overly detailed. In many cases these issues will be addressed in future supplementary planning documents or other strategies. As part of the consultation at the Regulation 19 stage, individuals who made comments through the Local Plan consultation portal were asked to provide details of their age, sex, ethnicity, disability, gender, sexual orientation and religion/belief. Respondents were also asked if they were a carer. A demographic breakdown of respondents was provided in the subsequent report to the Strategy & Resources Policy Committee. Of those who responded to the questions: • Only 3% were aged 24 or under; • 62% of respondents were aged 55 or over; • There were roughly equal numbers of male and female respondents; • 1 was from a person whose gender identity is different to their sex registered at birth; • 2 (1%) did not identify as male or female; • 10% were from people who were gay/bisexual/lesbian/gay woman/another; • 13.5% considered themselves to be disabled; • 13.5% were carers; • 60% had no religious belief; • 36% were Christian (all denominations); • 4% were from ethnic minorities. Overall, therefore, the number of people from ethnic minorities who responded was disappointing. Older people, disabled people and women were generally well represented in terms of people who responded to the question. The same data will be collected through the public consultation on the additional site allocations.

Action plan evidence:

The above information has been supported by the Local Plan content and its associated evidence base, including the

	Integrated Impact Assessment (December 2022). The Integrated Impact Assessment has been updated and forms part of the forthcoming public consultation.
Changes made as a result of action plan:	

Mitigation

Significant risk after mitigation measures:	No
Outline of impact and risks:	

Review Date

Review Date:	17/07/2025

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