

Planning Services, City Futures

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Officer: Laura Stephens
Date: 2nd July 2026

For the attention of Inspectors:
K Childs
D Troy
R Morgan

Dear Inspectors

Sheffield Plan – Response to Inspectors’ Post Main Modifications Note to the Council

Thank you for the opportunity to respond in detail to the questions in your letter of 5th June, following your review of representations on the Proposed Main Modifications consultation.

We have set out answers to the questions below and will provide an indicative timeline for carrying out any necessary further work when you have reviewed these.

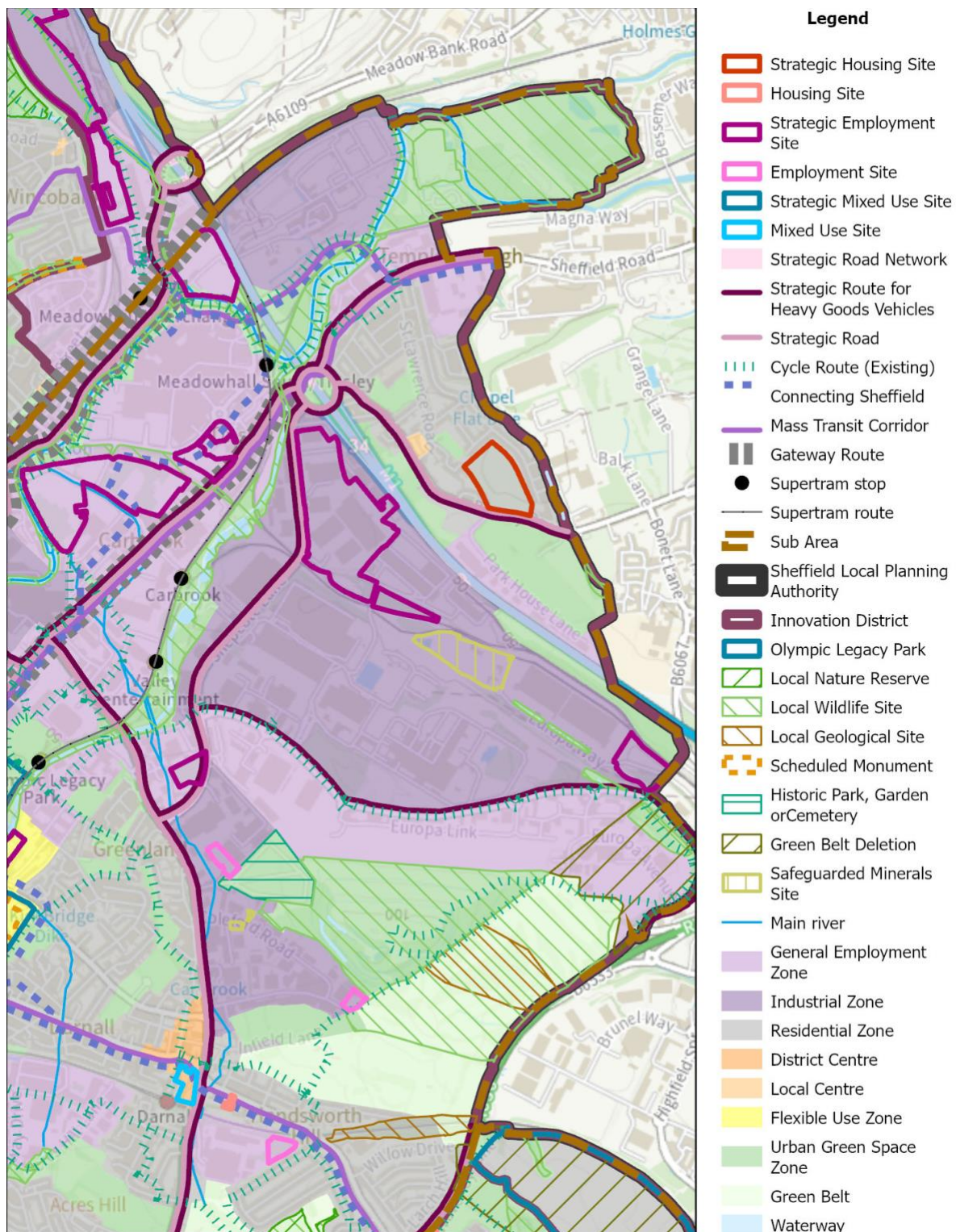
Innovation Corridor road scheme

2.3 Taking account of all factors in the round, there appears to be considerable uncertainty regarding the deliverability of the [Innovation Corridor] road scheme and whether the route on the Policies Map is feasible. In conclusion, we are not persuaded that there is a reasonable prospect of the Innovation Corridor road route, as shown on the Policies Map, being delivered within the Plan period. As such, in order for the Plan to be justified and effective, further main modifications are necessary to the Plan to delete reference to the road in Policy SA4(j). The safeguarded road route also needs to be removed from the Policies Map. These changes will need to be published for consultation and subject to further Sustainability Appraisal/Habitats Regulations Assessment work as necessary.

We agree that there is now considerable uncertainty about whether the Innovation Corridor road scheme can be delivered, given the withdrawal of the scheme from the Major Road Network/Large Local Majors programme. Consequently, we agree that part (j) of Policy SA4 should be deleted:

~~j) Safeguard the route of the potential Innovation Corridor road scheme, linking Meadowhall Road and Europa Link.~~

The notation on the Policies Map should also be removed:



We agree that it will be necessary to publicise the change to Policy SA4 and the Policies Map as main modifications.

With regard to the IIA and HRA, we do not consider that removal of the Innovation Corridor has any implications for either document – therefore neither of them require

updating to reflect this proposed modification. As you have noted, the Innovation Corridor was not factored into the transport modelling work because it was not a committed scheme. Consequently, removal of the scheme from the Plan has no effect on the assumptions about traffic levels in the IIA or HRAAA. No reference is made to the road scheme in either document.

Appraisal of sites put forward during consultation on the additional Green Belt sites in May 2025

3.1 Representations have been raised about how new sites in the urban area put forward during consultation in May 2025 (on the additional Green Belt site options) have been dealt with (5.0467 and others).

3.2 Document EXAM 130B sets out the subsequent Sustainability Appraisal (SA) and site appraisal of four new site options in the Green Belt which were proposed by representors during the May 2025 consultation. The Council is requested to confirm whether any new sites within the current urban area (not in the Green Belt) were promoted during the May 2025 consultation process? E.g. sites which have not previously been identified/appraised by the Council as part of the Plan preparation process.

3.3 If there are any new sites which are not in the Green Belt, the Council is requested to provide us with details of these sites (location, size and overview of suitability and deliverability). If the evidence is new there may be a need to subsequently publish SA/site appraisal evidence for consultation. This is linked to paragraph 141 in the NPPF 2023 which refers to the need to examine all reasonable options when justifying the need for Green Belt releases and to maximise the use of previously developed land.

3.4 The Council is also requested to provide further information on the new Green Belt site options in Table 3 in EXAM 130B – specifically, summary information on whether the sites are suitable and deliverable.

Our understanding is that your request to provide details of non-Green Belt sites put forward during the 2025 public consultation relates only to sites that are being directly promoted by a landowner or developer and not to sites suggested by community groups or third parties.

6 sites within the existing urban area were put forward by a landowner or developer in 2025 but our view is that if, ultimately, they are delivered within the Plan period they would be accounted for as part of the windfall allowance. We believe we made that point during the hearings. We would therefore welcome your advice on whether consideration of those sites as potential new allocations at this stage in the examination process is appropriate. In our view, there are three main reasons why that would not be an appropriate way forward:

- a) The 2025 consultation was not a call for sites - its purpose was to seek views on the proposed additional site allocations. Other landowners/ developers may have decided not to make representations at that stage because they understood it was not a call for sites – such people would potentially have been disadvantaged if other sites that were suggested at that stage are now included as allocations. You will recall that we agreed that another call for sites was not undertaken because it would have caused significant delay in the process.
- b) Prior to the consultation in 2025, the supply within the urban area had already been considered by yourselves and had led you to the conclusion that there was insufficient supply to meet the suggested (higher) housing need/ requirement figure, even with a fairly generous windfall allowance. As noted above, any new sites would fall within that windfall allowance if they were to come forward during the Plan period.
- c) Introducing new allocations at this stage would require updates to other evidence base documents, which would add delay to the examination.

Notwithstanding the points above, we have set out commentary below on the suitability, availability and deliverability of the 6 non-Green Belt sites and 4 Green Belt sites that were put forward. We can undertake sustainability appraisals for the 6 non-Green Belt sites if you confirm that is necessary.

A. Sites not in the Green Belt

Rep1.1958 – Bardwell Road, Neepsend:

0.22ha

Promoted by Heatons

The site promoter has suggested a capacity of 120 homes. However, using the HELAA rule of thumb the estimated capacity is for 77 homes based on a density of 350 dwellings per hectare (dph) (a density used in the neighbouring site's outline permission). The site is located within a Flexible Use Policy Zone and is therefore suitable in principle for housing. It is in close proximity to site allocations KN05 and KN13 which already have planning permission. The site was not promoted for development in previous consultations due to the landowner not having ownership of the site until recently but is now available for residential development.



Bardwell Road, Neepsend

Rep1.1995 – Infield Lane Allotments:

5.85 hectares

Promoted by DLP

The site promoter has suggested a capacity of 320 homes. Using the HELAA rule of thumb the estimated capacity is for 234 homes, based on a density of 40dph. In the Draft Plan, the site is currently shown as lying within an Urban Green Space Policy Zone. The principal issue is the loss of the allotments, which have important recreational and health and wellbeing functions and for which there is a deficit of supply within the local area. Further assessments would need to be provided to meet the requirements in policy GS1, including an assessment of the food growing value of the site, setting out why the site is no longer viable as an operational allotment site, and potential compensation for any loss. Subject to these outcomes, overall, we consider that the site would be potentially suitable for development.



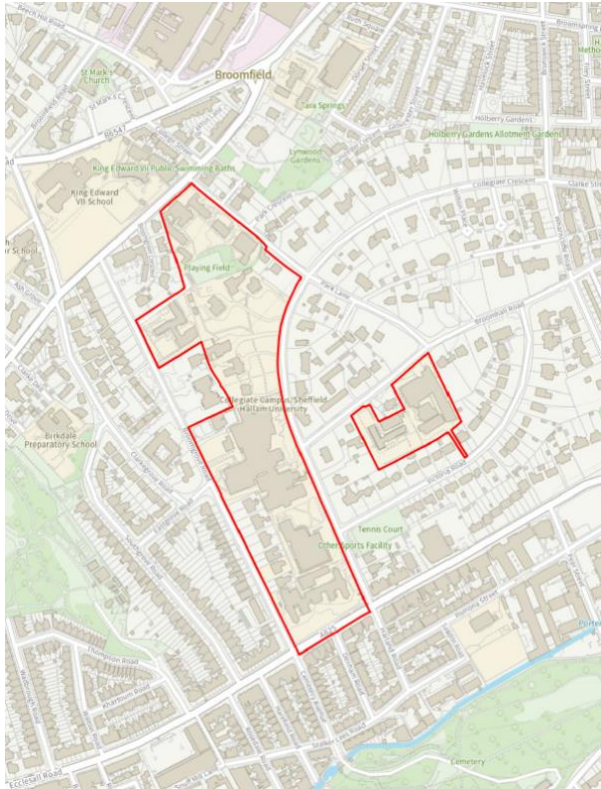
Infield Lane Allotments

Rep 1.2058 – SHU Collegiate Campus

Promoted by Montague Evans on behalf of Sheffield Hallam University

Note that the site promoter has not provided an indicative site capacity, gross site area or defined boundary within the representation. In the Draft Plan the campus lies in a University/ College Zone where residential uses are acceptable in principle. Sheffield Hallam University has indicated that they have undertaken an exercise to review the future of key landholdings outside of the City Centre. They have stated in their representation that they wish to vacate significant parts of the Collegiate Campus and are progressing with their City Centre focus. This is likely to be on a phased basis, and these ambitions are not fixed at this stage. As the site is in a Conservation Area and contains a number of listed buildings, it is likely that any redevelopment would involve conversion of some existing buildings but possibly some new building within the site curtilage, subject to the impact on the Conservation Area. The normal 'rules of thumb' for estimating the site capacity do not therefore apply. The total site area is around 6.5 hectares, but it is envisaged that some buildings would remain in university use in the medium term.

Given the uncertainty if the site comes forward wholly or in parts as a planning application, it could contribute to the windfall supply and could also be reconsidered as a potential site for allocation at the first Plan review when there may be greater certainty over Sheffield Hallam University's intentions for the land.



SHU Collegiate Campus

Rep 1.2144 – 2-4 Queens Road

Promoted by Montague Evans

The northern part of the site (2 Queens Road) was allocated for 61 units within the Draft Plan (LR06) and had full planning permission (19/02484/FUL). As part of this year's annual monitoring process, it has been established that the permission granted in 2021, has not been implemented and has now lapsed. A previous building on the site was demolished as part of a separate demolition application last year.

Following grant of planning permission, as part of the Plan's evidence base, the Level 2 SFRA subsequently showed the site lying in flood zone 3b, and therefore a main modification (MM313) has been proposed to delete site allocation LR06. The whole site lies with the Central Area Flexible Use Zone where residential uses are acceptable in principle but the suitability for development hinges on completion of the Sheaf and Porter Flood Zone modelling which will determine the correct flood zone. At the current time, we do not consider the site is suitable for development.



2-4 Queens Road

Rep 1.2148 - Basset Place/Outram Rd

Promoted by Great Places (but owned by Sheffield City Council)

1.2ha. Indicative capacity of 27 dwellings (in the representation)

The site is currently located in an Urban Green Space Zone and part of it is a Local Wildlife Site (but this has been excluded from the developable area in the indicative layout provided by Great Places). The site is owned by Sheffield City Council and is included in a draft programme for future disposal to a Housing Association.

Associated with this an Informal Planning Advice Note is currently being prepared, subject to further review and consultation. We consider that the site would be potentially suitable for development.



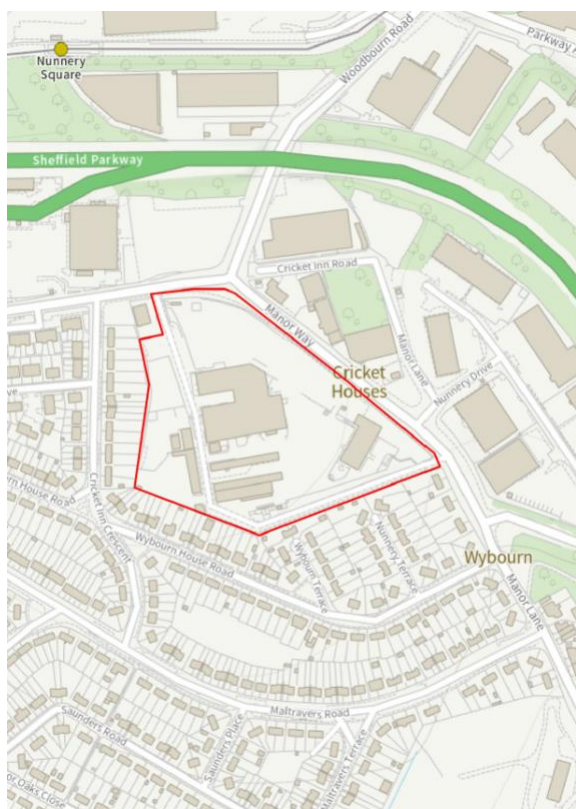
Basset Place/Outram Rd

Rep 1.2148 - Manor Lane Depot

Promoted by Great Places (but owned by Sheffield City Council)

3.6ha. Indicative capacity of 144-216 dwellings (provided in the representation)

The site is located in a Flexible Use Zone. The site is owned by Sheffield City Council and the Council itself has not promoted Manor Lane Depot, which is in operational use. Note that Staniforth Road Depot is an allocation in the Plan (ES31) as a site for residential development, and the ongoing usage of Manor Lane Depot is an essential part of the plan to enable ES31 to be cleared and delivered. At the current time, we do not consider that the site would be potentially suitable for the promoted development.



Manor Lane Depot

B. Sites in the Green Belt

Four sites in the Green Belt were put forward and have already been appraised (see EXAM 130B, Appendix 3). Further information regarding suitability and deliverability is set out below:

S02920 Land southwest of Fulwood Road

This site is located within the Green Belt on the edge of Fulwood, which is part of Sheffield's main urban area. No planning applications have been submitted, and the land was not promoted until 2025. The site was promoted by Lichfields on behalf of a single private landowner who has engaged with a willing developer. The site has been indicated as available and could be capable of delivering housing in the early part of the Plan period.

EXAM130B (Proposed Additional Site Allocations: Selection of Sites for Green Belt Release Topic Paper – Addendum (November 2025) identifies the key factors that should be considered when determining the site's suitability. Critically the site does not perform a strong Green Belt role, it is close to local services and facilities, it is close to the Core Public Transport Network and there are minimal flood risk issues. It would however potentially impact upon the Fulwood Conservation Area.

We have been made aware that the site may have formerly included an element of informal recreational use. Whilst there is historic evidence of goals on site, there was no formal delineation of the space that outlined a pitch. However, judging from aerial images, if the play space were to have been marked out, this would have

created a pitch of over 0.2ha, which would afford the site additional protections. Therefore, there exists a strong indication of informal recreational use, and the site has potential value as a formal playing field. Aerial photos show, until around 2015, the site contained football goals (however, the pitch is now overgrown, and the goalposts have been removed). Given the historic value as informal open green space and sporting provision, subject to assessment against the needs in the area as identified in the Playing Pitch Strategy, development may be required to provide compensation for the loss of the informal playing field.

Using the HELAA capacity assumptions, this 1.28 hectare site could deliver 45 homes (at 35 dph).

S02391 Land off Haggstones Road, Worrall

This site is located within the Green Belt, on the northern edge of Worrall which is defined as a large village in the Draft Sheffield Plan's settlement hierarchy. No planning applications have been submitted. The representation indicates that this site is deliverable within the first 5 years of the Plan period.

EXAM130B identifies the key factors that should be considered when determining the site's suitability. Critically the site performs a strong role in checking urban sprawl, the landscape has a low capacity to absorb development, and it is more than 1200m from the Core Public Transport Network. There are however some local services and community facilities within Worrall, including a secondary school. There is a primary school in nearby Oughtibridge.

Using the HELAA capacity assumptions, this 5.19 hectare site has a theoretical capacity of 156 homes (at 30 dph).

S02899 Land off Cinderhill Lane, Norton

This site is located within the Green Belt on the edge of Norton which is part of Sheffield's main urban area. No planning applications have been submitted. The site was not promoted to the Council during preparation of the Sheffield Plan prior to 2025 (although it had been promoted in 2015). Deliverability has been indicated as possible in the first 5 years of the Plan period.

EXAM130B identifies the key factors that should be considered when determining the site's suitability. These factors include the site's proximity to the Core Public Transport Network and local community facilities and services. The site is close to the Oakes Park Conservation Area, and it may have significant ecological value. The site falls within the boundary a larger parcel of land that was included in the 2015 Archaeology Scoping Study (GB04), and which was identified as having a major archaeological constraint due to archaeology finds recorded on the wider parcel and a Grade II listed cruck barn within the wider parcel. The site is located directly adjacent to the A6102 (Bochum Parkway) where air quality and traffic noise issues would need further consideration.

Using the HELAA capacity assumptions, this 0.72 hectare site has a theoretical capacity of 29 homes (at 40 dph).

S03059 Land at France Road, Loxley

This site is located within the Green Belt on the edge of Loxley which is part of Sheffield's main urban area. No planning applications have been submitted. The site has been promoted by an agent on behalf of a private landowner, and deliverability has been indicated as being within the first 5 years of the Plan period

EXAM130B identifies the key factors that should be considered when determining the site's suitability. Whilst site is within the proximity of local facilities, including schools, it is not close to the Core Public Transport Network. There are also concerns regarding impacts on landscape character and harm to heritage assets.

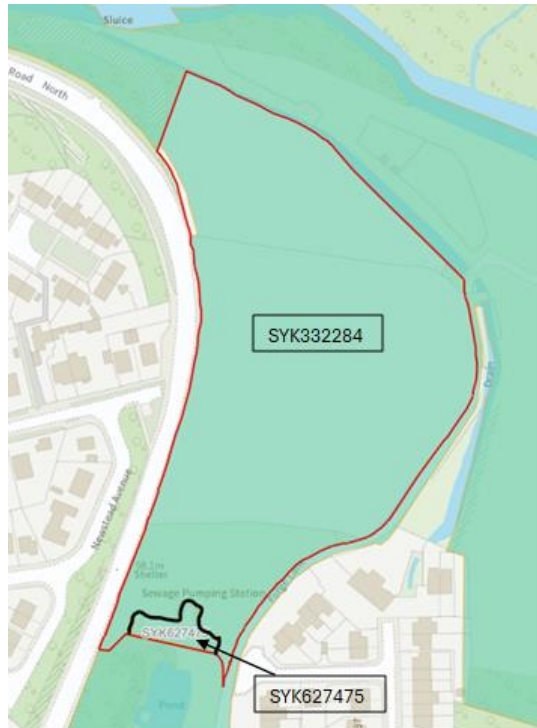
Using the HELAA capacity assumptions, this 3.45 hectare site has a theoretical capacity of 104 homes (at 30 dph).

Boundary of allocation sites NWS30 and SES29 (Yorkshire Water)

4.1 Representations from the site promoters/owners indicate that NWS30 and SES29 include small areas of land owned by Yorkshire Water which are not available for development. The Council is requested to confirm if this is correct. And if so, whether these areas of land should be removed from the site boundaries for effectiveness reasons, and the site areas adjusted accordingly? This would involve consultation on further modifications to adjust the site areas in the Plan and amendments to the Policies Map.

NWS30

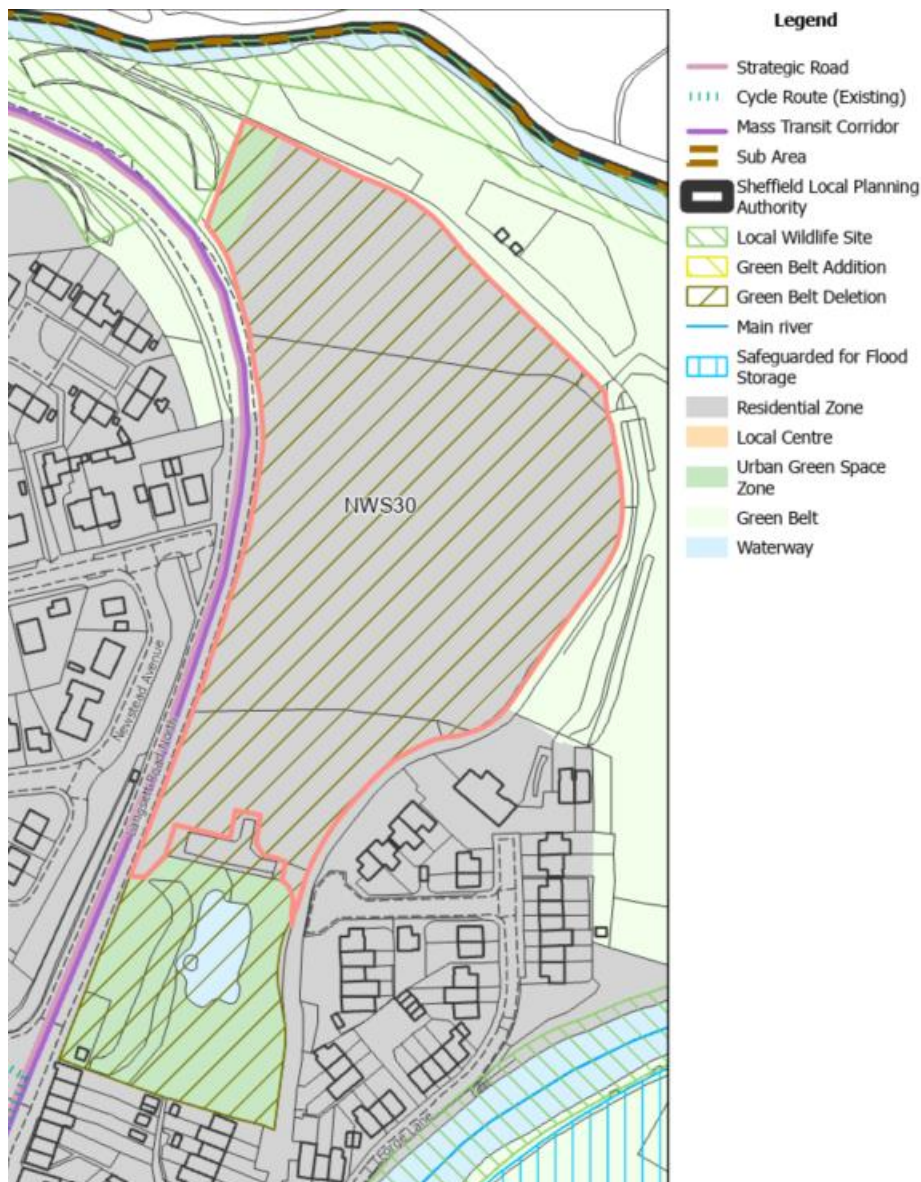
Site NWS30 comprises land under two separate landowners. SYK332284 covers 2.51ha (98.5% of the site) and is in freehold ownership of CEG and ASEII. This is confirmed within the Statement of Common Ground (EXAM160). SYK627475 covers only 0.04 ha (1.5% of the site) and is located at the southern end of the site. As set out in the Statement of Common Ground, this is land in the control of Yorkshire Water and comprises pumping machinery and a parking/turning area for vehicles, accessible off Forge Lane. SCC and CEG recognise that the land in Yorkshire Water's ownership does not form part of the developable area and does not preclude development of the allocation. The map below identifies the landownership position.



Yorkshire Water have not objected to the inclusion of this area of land within the allocated site. However, the Council propose that the allocation boundary is amended and the 0.04 hectares of land, comprising sewage pumping equipment, access and parking, which is owned by Yorkshire Water is removed from the allocation.

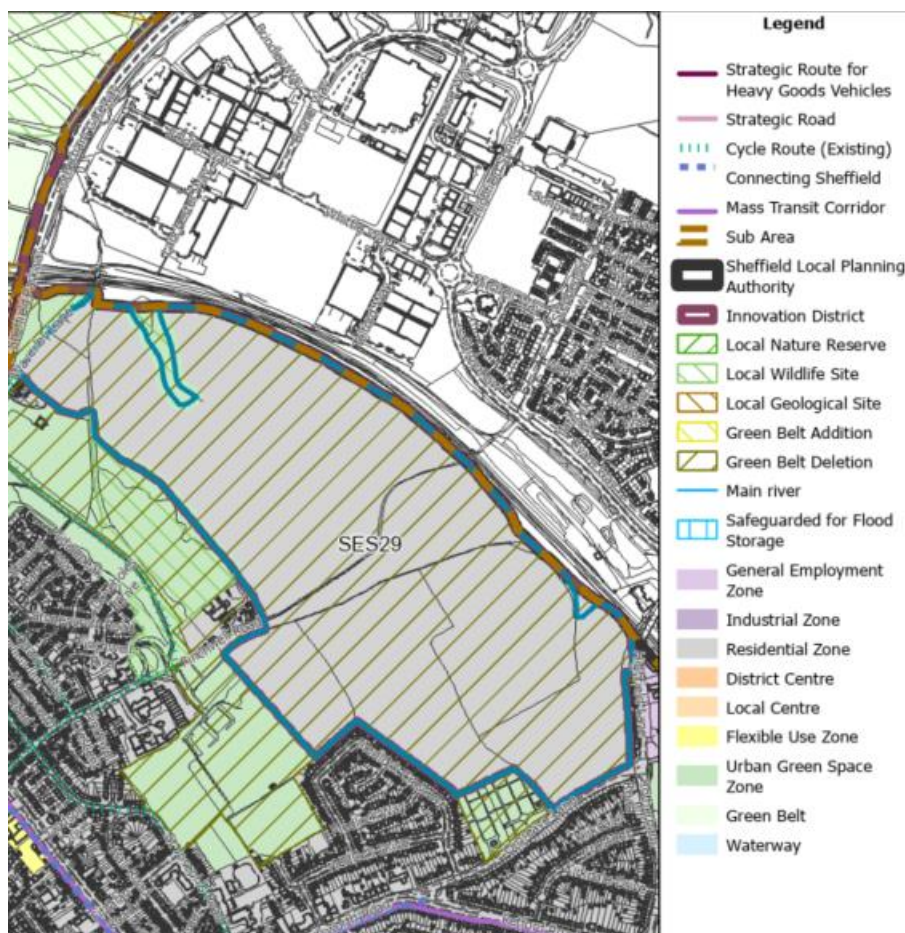
Consequently, the gross site area should be reduced by 0.04 hectares to 2.52 hectares. Applying the HELAA methodology, the net housing area should be reduced to 2.26 and total housing capacity reduced from 69 to 68 homes. The boundary as shown on the Policies Map will also require amending.

If you wish we can publicise the change to the gross site area, net housing area and housing capacity for NWS30 in Part 1, Appendix 1 and in Annex A. The associated site boundary on the Policies Map would also be amended (see below). Please clarify if you wish these changes to be publicised as main modifications. We do not propose a change to the housing trajectory or associated supply figures as a change of 1 unit against the whole Sheffield Plan supply is not significant but would welcome your views on that.



SES29

We can confirm for site SES29, that the two areas of land owned by Yorkshire Water have been removed, and this is reflected in the gross site area for MM410 which is 56.40 hectares, a reduction of 0.6ha from the previous gross area of 56.92ha. The full details are set out in document EXAM 200, under Action 29. In the process of producing the 'schedule of changes to the Policies Map arising from proposed modifications' the GIS software has 'rounded' off the site boundary incorrectly. We have produced a revised map below which shows the correct boundary. We can publicise the boundary as correctly shown on the Policies Map as a map change arising from main modification MM410 if you wish. Please clarify if you wish these changes to be publicised as main modifications.



Boundary of site NES38 (access road)

5.1 Representations from Norfolk Estates (5.0119) indicate the site boundary near the track to Holme Lane Farm is narrow and should be widened to allow the new road to pass through. The Council is requested to confirm its position on this matter and whether the boundary and site area should be adjusted for effectiveness reasons? This would involve consultation on further modifications to adjust the site area in the Plan and amendments to the Policies Map.

We have corresponded with representatives of both the Norfolk Estate and the Hill family who own land within the allocation, regarding ownership and availability of the turning area (the eastern end of which may be required to provide access to the southeastern part of the allocation). The representative of the Hill family has confirmed that the turning area is owned by the Hill family and that the family support part of their turning circle being included in the allocation if it is required to provide access. The Hill family's ownership is confirmed by the Land Registry.

We agree that an adjustment to ensure the site boundary includes this area is necessary for effectiveness, and consultation should take place accordingly. There will also be a small revision to the capacity of the site, taking account of the new net site area.

Application to secure Listed Building status for the bridge adjoining site SES29

6.1 A number of representations refer to a recent application to Historic England to secure Listed Building status for the old bridge at Highfield Lane (including 5.0472). The supplied map includes part of the access road leading up to the bridge which runs across the allocation site frontage. It would be appreciated if the Council could:

a) Confirm whether the Council intends, in the meantime, to add the structure to the Council's local list of heritage assets;

The old bridge itself is within the administrative boundary of Rotherham Metropolitan Borough Council, however the short section of the old Highfield Lane which approaches the bridge from the south is within Sheffield. This section of road is mostly overgrown.

Following assessment of a nomination received by the South Yorkshire Local Heritage List Project, both authorities will make the final decision whether to include the bridge and approach road within the Local List.

The project's records show that Local Heritage List nominations are currently being prepared for the railway bridge at Highfield Lane by a member or members of the public. However, the nomination has not yet been formally submitted to the South Yorkshire Local Heritage List Panel for review.

For reference, once submitted, the typical process and indicative timescales are as follows:

- Review and batching of nominations prior to assessment – the next assessment round is likely to start in 3–4 weeks
- Public consultation – over a 4 week period
- Assessment panel meetings – over a 5 week period
- Owner consultation – over a 3 week period
- Processing and formal adoption by the Council – within 8 weeks of completion of the above round stages

As a result, should the bridge be formally nominated, a recommendation on the suitability of this bridge for local listing and a decision on its adoption onto the Local List is likely to be in autumn 2026, at the earliest.

Given that the bridge and its old access have not formally been nominated, or reviewed by the listing panel, the Council cannot confirm whether they would be added to the Local List.

It is recognised that the bridge has some historic value, due to its connections to the Battle of Orgreave in 1984 during the Miners' Strike, and, at the present time would be considered a non-designated heritage asset.

b) Outline the anticipated timescale for Historic England's decision on the Listed Building application;

Historic England aim to complete their assessment of applications for listing within 6 months of receiving the request.

Once Historic England have completed their assessment, they send an advice report detailing their recommendation to the Department for Culture, Media and Sport. The Secretary of State for Culture, Media and Sport aims to make decisions on most recommendations within 10 working days of receipt of advice.

c) Outline what implications a potential listing of the structure could have on the ability to access site SES29 and facilitate development on the site. In particular, is it feasible to gain vehicular access to SES29 via Orgreave Lane only, with no access off Highfield Lane?

The landowner is progressing with the commissioning of work and the key milestones as set out in paragraph 14.4 and 14.5 of the Statement of Common Ground (EXAM156). This includes access to the site and an alternative highways arrangement to those within EXAM 179. EXAM 179 was an indicative layout provided during the examination as evidence that in principle access to the allocation can be achieved and therefore the allocation is deliverable.

The access arrangements currently being progressed do not include an access to the highway via Highfield Lane, with access instead provided off Orgreave Lane only. This access arrangement has been selected and progressed on the basis that it provides the most optimal access to the site. SCC has reviewed the draft access arrangements and provided technical advice on the scoping report for the Transport Assessment, and concluded that, subject to the Transport Assessment and further technical work, in principle access could be achieved off Orgreave Lane only.

Critically this revised access arrangement would comply with the condition on development, which is flexibly worded to allow alternative access arrangements off Orgreave Lane and/or Highfield Lane.

d) Are you content that the policy as drafted, taken together with other elements of the development plan, would adequately take the heritage matters into account (whether the bridge is statutorily or locally listed)? Does the anticipated site capacity remain justified?

Yes, the policy as drafted adequately takes heritage matters into account. Furthermore, the Council does not believe the bridge itself would be physically affected by the development proposed within SES29, nor is its setting adversely affected.

This position is shared by RMBC's Conservation Officer within their advice to SCC:

"if the bridge were to become Locally Listed it is unlikely that any harm to its setting from the proposed residential allocation could not be mitigated through landscaping and by ensuring that the bridge becomes part of a pedestrian link into Waverley, with its purpose largely having become redundant by the new bridge.

The new bridge largely obscures its views from the public realm in any case.

It is also worth noting the changing nature of the surrounding area. From a coking plant to an opencast mine and now a housing estate (from the Rotherham side). As such, its setting and indeed purpose of the bridge has changed considerably over time.

In any case, I do not think that the proposed residential allocation, if suitably mitigated, would harm its setting."

Notwithstanding this, should the bridge be statutorily or locally listed, Sheffield Plan policies D1 and DE9, alongside national policies, will together protect heritage assets. Policy D1 identifies structures associated with the metal trades and their supporting industries (which would include coal and coking industries) and its post-war built heritage as characteristics that should be respected (the bridge has associations with the former Orgreave Coking Plant and 'Battle of Orgreave' which took place on the 18th of June 1984 during the Miners' Strike). Policy DE9 states that *"Development proposals should conserve and, where appropriate, enhance and secure a sustainable future for those elements that contribute to the significance of the city's heritage assets, including locally listed structures, sites and landscapes and other non-designated heritage assets. Particular regard will be paid to those aspects of the historic environment identified in Policy D1, which are of special importance to the distinctive character of the city (see Policy D1)."*

Given the absence of harm to the bridge or its setting, and the limited heritage value of the old road, no mitigation measures are anticipated that would affect the capacity of the allocation to deliver 735 homes (during the plan period) and 20 hectares of employment land.

Regarding the old access road, if it were locally listed (alongside the bridge) and, notwithstanding the access arrangements being progressed, the access onto Highfield Road was required, the development would be subject to Policy

DE9 parts a), b) and e). These would also be applied to any harm to the bridge itself.

In accordance with Policy DE9, the development of SES29 offers opportunities to recognise the relationship of this bridge to the events in June 1984 and provide public access to the bridge.

Deliverability/timing of site HC07

7.1 Representations have questioned whether site HC07 is capable of delivering housing within the next five years, and refer to a recent application for an amended scheme which was refused by the Council in February 2026 (4693011). The Council is requested to respond to the representation and provide an update on the matter. This should include reasons for refusing the application, details of any appeals, and whether the Council considers the scheme for 1,105 homes is deliverable within the estimated timeframe in the trajectory.

We consider that site HC07 is capable of delivery within the next 5 years.

In July 2020 planning permission was first granted for the development of residential tower blocks on the site to provide a mix of student and non-student accommodation, with ancillary facilities and ground floor retail uses. Demolition, clearance, utility and retaining works took place on the site in 2021. Works resumed in 2024 and the site is currently under active construction, and the central lift shaft has already been constructed up to the 25th floor.

The originally approved development scheme has been modified through eight further planning consents granted following Section 73 applications. The approved changes include physical changes to the building, variants in height and different accommodation mixes. There are therefore a number of active planning consents through which the scheme can continue to be delivered. CIL has already been paid in full.

The alternative scheme that was refused permission in February 2026 related to both the height of the 3 building components and the internal configuration of the accommodation/ unit mix. It was concluded within the Officer Decision report that seeking to remove all diversity to the housing mix, resulting in a development of 100% studio type self-contained living units would not be policy compliant and the S73 application was refused. This scheme is currently being considered at appeal with hearings to be held at the end of September and a decision expected by the end of October. Two further Section 73 application were submitted at the end of February 2026, one of which increases the height of two blocks and was approved. A second, seeking a revised amendment to accommodation mix (26/00505/FUL), was refused.

Policy NC3 Affordable Housing and viability testing

8.1 A number of representations on the proposed main modifications object to the percentage of affordable housing being linked to Gross Internal Floor Area (GIFA) rather than units (including 4619529, 4690585 5.0425 and HBF). This is notwithstanding that the GIFA approach is set out in submitted Policy NC3 and was covered in the Inspector's Main Issues and Questions (and is set out in the Council's Supplementary Planning Document on CIL and Developer Contributions 2015). Section 19.6 in the Council's hearing statement (WS19/1) sets out the Council's response on the use of GIFA.

8.2 However, further comments have been made on how affordable housing percentages have been tested in the Council's Whole Plan Viability Assessment work (VI01 and EXAM 131). In VI01 it states that all of the proposed development plan policies have been taken account of and Policy NC3 is quoted in full (with the references to GIFA). This was the position that the Council maintained at the hearings. EXAM 131 indicates that the same approach was taken as in VI01. Nevertheless, our attention has been drawn to paragraph 3.29 in VI01 which indicates that the modelling work is based on units rather than GIFA. It would be appreciated if the Council could confirm and explain what approach it has taken in the viability work. The base appraisals in Appendix 14 in VI01 appear to apply the percentage in terms of both units and GIFA.

Paragraph 3.29 in VI01 states:

...At the time of the 2019 iteration of this assessment SCC based the affordable housing policy on Gross Internal Area (GIA) so the model was adjusted to accommodate this. The draft policy is now based on units, so the model has reverted to the per/unit basis. ...

The modelling in the viability work is based on units and not on Gross Internal Floor Area (GIFA); we confirm that this part of the statement is correct. Draft policy NC3 is based on GIFA, not on units.

The approach taken in the viability work is explained further below, in the context of paragraph 3.29.

The 2019 SHMA which was published in July 2019, identified the mix of housing (by size, and tenure) required in the future. It is not proposed that this should be applied to future development through policy requirements, however it was used to inform the housing mix.

The key mix was as follows (see table 8.1 in document HS05):

- One bed 27% to 33%
- Two bed 33% to 42%
- Three bed 20% to 21%
- Four bed 10% to 13%

This mix was in turn used to inform the modelling in the Whole Plan Viability Assessment – although regard was also had to market realities – for example, flatted schemes are generally likely to include more smaller units, rather than larger family units; similar schemes on the edge of the built-up area are likely to include more family housing. The consideration was to balance the housing market over the whole plan area, rather than within each scheme.

It is correct that the '*base appraisals in Appendix 14 in VI01 appear to apply the percentage in terms of both units and GIFA*'. The modelling is based on units, however when disaggregated into sqm of GIFA it produces the same results, thus the approach taken in the viability work.

The following tables show that the percentage of units in the modelling is the same (subject to minor rounding) as the percentage of floor area. For example, in a housing-based scheme, the market units provide 70.00% of the units and 70.46% of the floor area.

For housing development, the net saleable area is the same as the GIFA, but for flatted development the net saleable area is less as circulation space is discounted.

HOUSING	Units		Saleable sqm		Total sqm	
			sqm	% of saleable floor area	sqm	% of GIFA
Market	35	70.00%	3,508	70.46%	3,508	70.46%
Affordable for Rent	11	22.00%	1,064	21.37%	1,064	21.37%
Affordable Home Ownership	0	0.00%	0	0.00%	0	0.00%
First Homes	4	8.00%	407	8.17%	407	8.17%
	50	100.00%	4,979	100.00%	4,979	100.00%

FLATS	Units		Saleable sqm		Total sqm	
			sqm	% of saleable floor area	sqm	% of GIFA
Market	35	70.00%	2,072	70.31%	2,279	70.31%
Affordable for Rent	11	22.00%	653	22.16%	718	22.16%
Affordable Home Ownership	1	2.00%	61	2.07%	67	2.07%
First Homes	3	6.00%	161	5.46%	177	5.46%

	50	100.00%	2,947	100.00%	3,242	100.00%
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The above tables assume that the housing mix, in terms of numbers of bedrooms is similar for both market and affordable housing. This corresponds with the identified housing need. If a developer produced a scheme where all the market housing was large 4 and 5 bedroom detached housing and all the affordable housing was small 1 and 2 bedroom affordable housing the floor areas would be quite different – and this is what we wish to avoid in basing the policy on GIFA (as set out in section 19.6 in WS19/1, our response to the use of GIFA).

Policy GS5 Biodiversity

9.1 Representation 5.0433 (Sheffield and Rotherham Wildlife Trust) says that Priority Habitats and Priority Species are incorrectly placed within the hierarchy in the modified version of Policy GS5, and should be listed within the national, rather than the local category. Please can the Council provide a response to this representation, including a view on whether a further main modification is required to make the policy sound.

We consider that an amendment to Main Modification MM185 is necessary to make the policy sound. Main Modification MM185 already states that the greatest weight will be given to the protection of 'Irreplaceable Habitats' and 'Protected Species' (which are identified at the national or international level). Priority Habitats and Priority Species are also identified as being priority at the national level, however on a site-by-site basis, the significance of their presence will depend on their extent, population etc, which would usually be determined through a Preliminary Ecological Appraisal, Ecological Impact Assessment or similar.

Most Priority Habitats in Sheffield are protected through ecological designations covered by the first to third bullet point, as appropriate. The third bullet point was intended to apply to Priority Habitats and Priority Species that are locally important but are not covered under bullet point 2. However, having reflected on the consultation response, we suggest that the third bullet point is amended, and a sentence is added after it to make it clear that the weight accorded to the protection of Priority Habitats and Priority Species can vary depending on the characteristics of the site. For example, protection of a site that included a large population of a Priority Species would be afforded more weight than one that just had a single individual whose presence could be mitigated and compensated, or the species may easily be able to move. This allows for the real-life complexity of site-by-site biodiversity.

In order to make the policy sound, we would therefore suggest that the first part of the policy is worded as follows:

'All development proposals will be required to follow the mitigation hierarchy, whereby if significant harm to biodiversity resulting from a development

cannot be avoided (e.g. through alternative site selection with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused. Development should avoid causing significant harm (directly or indirectly) to protected and priority species/habitats and to areas and sites designated for their ecological value. Where development is likely to affect these, it will be assessed in relation to the following hierarchical ~~weighting priority species and/or designated sites:~~

- International designation: the greatest weight will be given to the protection of ~~priority species~~, Special Protection Areas, and Special Areas of Conservation, Ramsar Sites, and Irreplaceable Habitats, and Protected Species;
- National designations: very significant weight will be given to the protection of Sites of Special Scientific Interest and Local Nature Reserves;
- Local designation: significant weight will be given to the protection of Local Nature Reserves, and Local Wildlife Sites (LWSs), ~~and Priority Habitats, and Priority Species.~~

Priority Habitats and Species will be afforded significant or very significant weight, proportionate to their ecological value informed by site specific evidence'

Do you agree with this approach and consider that it would be necessary to publicise this revision as a main modification?

Policy BG1 Blue and green infrastructure

10.1 Representation 5.0478 raises concerns about whether the proposed modifications to Policy BG1 could hinder development, including on the allocated sites. The Council is requested to respond to the representation and confirm whether the two new bullet points and the new final paragraph in the policy are justified and proportionate. Is the new bullet on green spaces consistent with the condition in the site allocation policies which requires schemes to 'explore opportunities to provide ecological corridors having regard to the Local Nature Recovery Network.' Does the final new paragraph relate to designated wildlife sites?

We do not consider that the first new bullet point, relating to historic parks and gardens, requires any amendment. There is no inconsistency with the condition in the site allocation policies.

With regard to the second new bullet point (referring to connective spaces), we think it is appropriate to give very significant weight to the protection and enhancement of green and blue spaces that *connect* designated ecological sites, especially those highlighted in the LNRS as 'Areas that Could Become of Particular Importance for Biodiversity'. We do not see this as meaning that no development could take place

within a greenspace – the key objective is to ensure that connectivity is maintained or enhanced. Site layouts should ensure that opportunities are taken to create better links between habitats as part of new development - this would be achieved through the provision of natural green and blue space and landscaped/amenity areas.

On reflection, we consider that the wording of the second new bullet point could be amended to provide greater emphasis on habitat connectivity to make it more effective. It could be amended to read:

- *ensuring that greens spaces forming (or with potential to form) wildlife corridors or 'stepping stones' connectivity connecting between designated ecological sites (particularly those 'Areas that Could Become of Particular Importance for Biodiversity' identified in the Local Nature Recovery Strategy) is maintained or enhanced as part of new development through the protection or creation of green and blue spaces, as appropriate.*

The final paragraph of the policy deals with situations where there could be conflict between achieving public access (for example, footpath routes along riverbanks) and biodiversity objectives. The intention is that the final paragraph would apply primarily to statutory and non-statutory *designated* wildlife sites but there could be circumstances where, for instance, public access would conflict with management of a green space that provides connectivity between designated sites.

Do you agree with this approach and consider that it would be necessary to publicise this revision as a main modification?

We hope the above responses are helpful but please let us know if you have any further queries.

Yours sincerely

A black rectangular box redacting the signature of Michael Johnson.

Michael Johnson
Head of Planning