



Report to Sheffield City Council

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PLANNING & COMPULSORY PURCHASE ACT 2004 SECTION 20

REPORT ON THE EXAMINATION INTO THE SHEFFIELD CORE STRATEGY

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ABBREVIATIONS

AA	Appropriate Assessment
AMR	Annual Monitoring Report
BREEAM	(BRE Environmental Assessment Method)
Core Strategy	Sheffield Core Strategy
[CD]	Core Document
Circ 05/2005	Circular 05/2005 Planning Obligations
DfT	Department for Transport
DPD	Development Plan Document
EA	Environment Agency
EIP	Examination in Public
GOYH	Government Office for Yorkshire and the Humber
ha	hectares
HMRA	Housing Market Renewal Area
LDF	Local Development Framework
LDS	Local Development Scheme
LTP2	South Yorkshire Local Transport Plan
Pa	Each year
PPS	Planning Policy Statement
RSS	Regional Spatial Strategy
SLDF	Sheffield Local Development Framework
SA	Sustainability Appraisal
SFRA	Strategic Flood Risk Assessment
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SPD	Supplementary Planning Document
sq m	square metres
UDP	Unitary Development Plan 1998

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INTRODUCTION AND OVERALL CONCLUSION

- 1.1 Under the terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004, the purpose of the independent examination of a development plan document (DPD) is to determine:
- (a) whether it satisfies the requirements of s19 & s24(1) of the 2004 Act, the regulations under s17(7), and any regulations under s36 relating to the preparation of the document;
 - (b) whether it is sound.
- 1.2 This report contains my assessment of the Sheffield Core Strategy (Core Strategy) on the above matters, along with my recommendations and the reasons for them, as required by section 20(7) of the 2004 Act.
- 1.3 In addition, Regulation 13(5) of the Town and Country Planning (Local Development) (England) Regulations 2004 requires that where a DPD is intended to replace an old policy, it must state that fact and identify the old policy it is to replace. This requirement is generally met by Appendix C of the Core Strategy. However, it should be amended to include all superseded policies and to correct the reference numbers of 4 of the policies listed, as shown in my recommended change (**IC1**), which is contained in Annex A to this report. (See paragraph 1.8 below, which explains how recommended and endorsed changes are referenced in this report.)
- 1.4 I have considered the soundness of the submitted Core Strategy against the tests of soundness set out in PPS12 (2004) at paragraph 4.24. However, the policy guidance contained in the extant PPS12, published late during the Examination process, which re-packages the nine soundness tests into three; justified, effective and consistent with national policy, is a material consideration that I have taken into account. The changes to the Core Strategy that I have recommended in this binding report are made only where there is a clear need to amend it in the light of the tests of soundness in PPS12 (2004) and PPS12 (2008). None of them would materially alter the overall substance of the Core Strategy and its policies, introduce new factual material or undermine the Sustainability Appraisal and the participatory processes already undertaken.
- 1.5 My report firstly assesses the Core Strategy against the procedural and conformity tests, and then deals with the main planning matters and issues considered during the Examination in terms of the three groups of soundness tests; coherence, consistency and effectiveness. My report does not address individual representations, although these were used as a starting point for identification of the main matters and issues for examination. Nor does it address individual policies that do not raise soundness issues.
- 1.6 As submitted, I conclude that the Sheffield Core Strategy is unsound; principally due to its inconsistency with PPS3 with regards to reliance on windfalls as part of the housing provision, over-provision of employment land, lack of clarity of its Green Belt policy, inappropriate delegation of detail concerning provision for housing mix and density, and provision for gypsies, travellers and travelling showpeople to a subservient DPD, absence of a Strategic Housing Land Availability Assessment (SHLAA) and a robust city-wide Strategic Flood Risk Assessment (SFRA) and clear application of the sequential and exception tests of PPS25, gaps in policy coverage concerning climate change, a general lack of coherence in the structure of the DPD and inadequate identification of mechanisms for implementation and monitoring. I raised all of these concerns,

and others, with the Council at an Exploratory Meeting held on 3rd January 2008 and in my subsequent Matters and Issues papers. In response, the Council has suggested a number of new and amplified policies, which were the subject of a separate consultation period that meet the Statement of Community Involvement requirements, between 18th April and 30th May 2008. The new and amplified policy detail has mainly been brought forward from policies contained in the Preferred Options City Policies DPD, which was subject to a Sustainability Appraisal. The new and amplified policies which were the subject of this post-submission consultation exercise are: SH5: Efficient Use of Housing Land and Accessibility, SH6: Affordable Housing, SH7: Creating Mixed Communities, SH8: Locations for Gypsy and Traveller and Travelling Showpeople Sites, SOS3: Safeguarding of Open Space, SE2A: Design Principles, SE5B: Sustainable Design of Buildings and Spaces, SE5C: Renewable Energy and Carbon Reduction and SE5D: Flood Risk Management. I am satisfied that none require a separate Sustainability Appraisal.

- 1.7 Having considered these suggested new and amplified policies and additional evidence that has become available during the examination process, together with other issues raised at the hearing sessions and in the written statements, including changes suggested by the Council and in representations, I conclude that the Core Strategy can be amended to overcome these shortcomings and can be made sound. Cumulatively the number of changes that I recommend must be made in order to make the Core Strategy sound are substantial and should not be regarded as the acceptable norm. But taking into account that the Council commenced preparation of its Core Strategy relatively soon after the introduction of the LDF system in 2004, that many of my recommended changes arise as a result of necessary restructuring of the DPD and that overall they do not alter the thrust of the Spatial Vision I conclude that the degree of pragmatism that I have exercised in this particular examination is justified and falls within the scope of changes that I may reasonably recommend in these circumstances.
- 1.8 References to Core Documents are given in square brackets []. Annex A to this report lists and gives the precise details and wording of, and the reasons for all of the changes which are necessary in order to make the Core Strategy sound. Those that are referred to as (PC//) were suggested by the Council and are listed in Core Document ED25 [CD]. Others that are shown as (IC//) originate from me. Changes that originate from the Council that I have amended are shown as (PC//A).
- 1.9 All recommended changes that go to the heart of the soundness of the Core Strategy are either listed in [ED25], which has been published on the Council's website and/or were discussed at the hearing sessions, or in further written representations. I am satisfied that adequate provision has been made for public engagement in their regard and that none require a separate Sustainability Appraisal.
- 1.10 Annex B refers to other changes suggested by the Council and others that are of a minor factual nature, or add clarity or consistency, which I endorse cumulatively in the interests of the clarity and coherence of the Core Strategy, but they do not individually go to the heart of its soundness. I have generally made no further reference to these in my report. However, many of the changes suggested by the Council and included in [ED25] appear in neither Annex A nor B of this report. This is because they neither go to the heart of the soundness of the Core Strategy nor are of a typographical, grammatical or factual nature, or they have been superseded by subsequent changes suggested by the Council. They are therefore

unnecessary and I have made no comment on them. They should not be incorporated in the adopted version of the Core Strategy.

- 1.11 **My overall conclusion is that the Core Strategy is unsound, but may be made sound, with reference to both the former and extant tests of PPS12, subject to it being amended in accordance with all of my recommended changes referred to in this report, which are listed in full in Annex A. The main changes required to make the Core Strategy sound are to:**
- **Make reduced provision for employment land.**
 - **Omit reliance on windfalls in the housing supply.**
 - **Clarify the intended policy approach for the Green Belt**
 - **Provide additional policy guidance on intended action to reduce the impact of development on climate change.**
 - **Restructure the DPD to make it spatial and coherent.**
 - **Add appendices that indicate how the policies and proposals of the Core Strategy will be delivered and monitored.**

PROCEDURAL MATTERS

Consistency with the Local Development Scheme

- 2.1 The Core Strategy appears in the Local Development Scheme April 2006-March 2010 (LDS) [CD09], adopted by the Council in November 2006. The targets and milestones for the Core Strategy up to and including the examination hearings have been met.
- 2.2 The purposes of the Core Strategy, as set out in the LDS are to: contain the vision, aims, objectives and overall strategy, make connections with other major strategies, identify the main spatial changes over the following 15-20 years and the Framework's spatial policies, set out locational criteria where it is not possible to be more specific about spatial policy and to show broadly how the policies will be implemented.
- 2.3 **I conclude that the Core Strategy conforms to the scope and broad purpose for the DPD, as set out in the LDS, and meets soundness test i.**
- Compliance with a Statement of Community Involvement and Associated Regulations.***
- 2.4 The Council's Statement of Community Involvement (SCI) [CD08] was adopted in September 2006. However, since the SCI was adopted after the early consultation stages on the Core Strategy were commenced the Council must comply with the minimum requirements, as set out in the 2004 Regulations.
- 2.5 From the evidence, I am satisfied that the production of the Core Strategy has involved continuous and wide-ranging community involvement, full details of which are contained in the Pre-Submission Consultation Statement [CD04]. This document identifies the processes, results and outcomes of the consultation and stakeholder involvement. It identifies that the use of a variety of consultation tools and methods has led to a broad range of people and interests becoming involved in the process. In addition, to address some 'loose ends' in the Preferred Options stage of the Sheffield Local Development Framework (SLDF) process, an Additional Options consultation was carried out in February 2007, by which time the SCI had been adopted. A further post-submission consultation process on the new and

amplified policies listed at paragraph 1.6 above was undertaken in April/May 2008 in accordance with SCI, as confirmed in [BD34 and BD35].

- 2.6 I am satisfied that the Core Strategy meets the minimum requirements of the 2004 Regulations and that the community has been able to participate in its preparation.
- 2.7 **I conclude that the Core Strategy meets soundness test ii.**
- Sustainability Appraisal and Appropriate Assessment***
- 2.8 The Core Strategy has been subject to Sustainability Appraisal (SA) at each formal stage of preparation. The process and outcomes are described in the Sustainability Appraisal Report and its appendices [CD02]. The baseline information used is described in its Appendix SA4 - Sustainability Baseline and Scoping Report.
- 2.9 The Baseline and Scoping report [CD02], which identifies the key sustainability issues facing Sheffield, was published in 2005. It identifies 20 sustainability objectives to appraise the likely significant effects of the Core Strategy. The objectives cover a range of themes, including environmental, social and economic, and aim to ensure that all likely effects of implementing the DPD are considered.
- 2.10 Each policy in the submission version of the Core Strategy, including proposed housing development on greenfield land at Owlthorpe, has been assessed, along with alternative approaches, against the sustainability objectives and conclusions made about the likely impacts. This process has contributed significantly to the final choice of policy included in the Core Strategy. Strategic alternatives were also considered, from which policy approaches were then developed, taking forward a sustainable spatial vision for the City. The SA report also considers whether there are any measures which could be taken to better support the principles of sustainable development and mitigate any adverse impacts of carrying out development, based on the policies set out in the Core Strategy. Examples identified through this process include flood alleviation measures, developer contributions to education, provision of replacement open space and public transport improvements.
- 2.11 There has been an independent appraisal of all stages of the SA and I am satisfied that the process, baseline information used and the outcomes are properly identified, that the options tested represent real rather than notional differences in policy, that it incorporates the requirements of the EU Directive 2001/42/EC on Strategic Environmental Assessment and also that the Core Strategy complies with the requirement of section 19(5) of the 2004 Act.
- 2.12 In addition, legal protection for habitats and species of European importance is set out in EU Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna (the Habitats Directive). It requires that plans or projects not connected with the management of Natura 2000 sites, but likely to have a significant impact on them, either alone or in combination with other plans, should be the subject of Appropriate Assessment (AA).
- 2.13 The screening report for an AA was undertaken by the Council in November 2007 [CD12]. It concludes that the policies contained within the Core Strategy alone, or in combination with other plans, are unlikely to have a detrimental effect on the integrity of Natura 2000 sites and therefore that a full AA is not required. I have no reason to dispute this conclusion, which is supported by Natural England.
- 2.14 **I conclude that the Core Strategy meets soundness test iii.**

CONFORMITY - OVERVIEW

Conformity

Main Matter – Whether the Core Strategy is a spatial plan that is consistent with national planning policy, in general conformity with the Regional Spatial Strategy and takes account of other relevant local plans and policies.

- 3.1 Amongst other matters, section 19 (2) of the 2004 Act sets out the national, regional and local policies and guidance to which a DPD must have regard. These include planning policy and guidance issued by the Secretary of State, the Regional Spatial Strategy (RSS) for the area and other local development documents adopted by the authority.
- 3.2 Paragraphs 1.8 – 1.11 of PPS12 (2004) indicates the Government's approach towards spatial planning and how this should be taken into account in the preparation of local development strategies. This approach is carried forward in the extant PPS12. I am satisfied that the Core Strategy has been prepared in accordance with this guidance in so much as it is directly related to a geographical area and it contains policies that refer to a broader range of matters than traditional land-use planning considerations. I consider that, except for an over-provision for employment land that I make recommendations upon in section 5.1 of this report, the Core Strategy adequately balances competing demands in the context of sustainable development and it brings together and integrates policies for the development and use of land with those of utility services and agencies providing services in the area. Evidence of this is provided in the supporting text for many of the City-wide policies and in the comprehensive Background Reports [BD01-BD33] to the Core Strategy, and is supported by the fact that significant representations of unsoundness have not been received from such bodies.
- 3.3 However, the structure of the DPD, which follows the 'old-style' UDP approach of Part 1 and Part 2 policies, tends to separate rather than integrate policies for the development and use of land. Thus it is not truly spatial and is not, therefore, consistent with PPS12. Consequently, it fails to meet test iv (a). However, my recommended re-structuring of the layout of the DPD that I describe in the following section 4 of this report addresses this shortcoming by bringing together the City-wide and Area-specific policies and re-organising them into groups that relate to the 7 strands of the Core Strategy Spatial Vision. The Core Strategy also refers to 'regulatory' policies, which again reflects 'old-style' thinking. Such references should be replaced by references to 'development management' or criteria based policies in order to set the appropriate context for the forthcoming City Policies DPD (**IC73, PC49, and PC52**).
- 3.4 In addition, the Core Strategy is inconsistent with national planning policy with regards to Planning Policy Planning and Climate Change Supplement to PPS1, PPS3 and PPS25. I address and make recommendations upon these inconsistencies in section 5 of this report under the relevant main matter, in order to make the DPD sound having regard to test iv (b).
- 3.5 Section 24 (1) of the 2004 Act requires that a DPD must be in general conformity with the Regional Spatial Strategy (RSS) for the region. At the time of submission of the Core Strategy the RSS for the region was the RSS: Yorkshire and Humber Plan based on a selective review of RPG12, published in 2004 [RD15]. The draft RSS: Yorkshire and Humber Plan was published in December 2005 [RD01]. The Panel Report of the Examination in Public of the draft RSS was published in 2007

[RD17] and the Secretary of State's Proposed Changes was published in September 2007 [RD16]. The final version was published in May 2008 [RD23] without significant further changes being made to policies affecting the Sheffield area. Nevertheless, consequential amendments are required to policies of the Core Strategy that concern renewable energy and waste management. I discuss these more fully and make recommendations for changes in section 5 of this report below. In addition, for factual correctness, all references to the various stages of the RSS should be expressed as, 'Regional Spatial Strategy' **(IC67)**.

3.6 In its representation dated 8 November 2007, The Regional Assembly for Yorkshire and Humberside confirmed that, in its opinion, the Core Strategy is in general conformity with both the then current RSS and the Secretary of State's Proposed Changes [CD20]. However, it cites non-conformity concerning Core Strategy Policies SB3 - Locations for Office Development, SH1 - Scale of the Requirement for New Housing and ST1 - Transport Priorities, which I take up and make recommendations for changes in section 5 of this report under the relevant main matter to make the DPD sound with regards to test iv(c). Subject to these changes being made I am satisfied that the Core Strategy is in general conformity with the RSS published in May 2008.

3.7 **I conclude that the Core Strategy is unsound because it is inconsistent with Planning Policy Planning and Climate Change - Supplement to PPS1, PPS3, PPS12 and PPS25 and it is not in general conformity with parts of the RSS. My recommendations to make it sound are set out in sections 4 and 5 of this report, and in (IC67, IC73, PC49 and PC52), full details of which are given in Annex A to this report.**

Regard to the Sustainable Community Strategy

3.8 I am satisfied that the Core Strategy has taken full account of the Sustainable Community Strategy contained in the 2007 update of the 'Sheffield City Strategy 2005-2010' [PD01], which sets out the overall vision, aims and targets for the City and provides the wider context for a range of supporting partnership strategies.

3.9 Its vision is that; "Sheffield will be a successful, distinctive city of European significance at the heart of a strong city region, with opportunities for all". The approach to achieving this vision is built on 3 key principles; prosperity, inclusion and sustainability and it sets out '5 big ambitions' for Sheffield's transformation where a step-change is thought to be needed over the next 10 years. These are set out in paragraph 2.29 of the Core Strategy and further cross-references are made in the Background Reports [BD01-BD33]. In my opinion, the 7 strands of the Core Strategy's Spatial Vision, given at its paragraph 3.4, clearly have regard to the '5 big ambitions' for Sheffield. Consequently, I consider that the Core Strategy will be a key component in the delivery of the Sustainable Community Strategy for the City.

3.10 **I conclude that the Core Strategy meets soundness test v.**

COHERENCE AND CONSISTENCY

Main Matter – Whether the Core Strategy is coherent and consistent both internally and with regards to subservient DPDs within the Sheffield Local Development Framework, and with other relevant plans prepared by neighbouring authorities.

The Coherence of the Core Strategy

- 4.1 The Issues and Challenges facing Sheffield, the SLDF Vision and the Objectives for the Core Strategy are carefully built up in its first 3 Chapters. Their rehearsal is lengthy, but as I have concluded at paragraph 3.10 above, they clearly have regard to the Council's Spatial Community Strategy. They are generally locally distinctive and flow logically. However, Chapter 4 then goes on to explain 'The Spatial Vision and Strategy', which describe the intended settlement pattern for the area. This is very confusing because Chapter 4 introduces a second vision for the Core Strategy running in tandem with the SLDF Vision. This structure containing a 'double vision' results in considerable confusion, incoherence and repetition throughout the remainder of the DPD.
- 4.2 The subsequent policies are then set out in 2 parts; City-wide spatial policies and Area-spatial policies, which are respectively associated with each of the 'visions'. However, to compound the incoherence of the structure of the document, the City-wide spatial policies do not logically flow from either of the 'visions'. They are set out under traditional land use chapters; business and industry, retail, housing etc. As a result, although the policies may mainly deliver the 'visions' there are a great many of them, 73 in all, and there are gaps or weak coverage of parts of the 'visions', especially with regards to addressing the wider implications of climate change, despite this matter being particularly highlighted in Challenge 11, Objective S11.1 and Strand 6 of the SLDF Vision, and is also an important aspect of the Government's planning agenda. I address this and other strategic policy gaps in sections 5 of this report below.
- 4.3 Consequently, I conclude that the Core Strategy fails to clearly set out the key elements of the planning framework for the area as required in paragraph 2.9 of PPS12, and that it is incoherent. Thus it fails to meet soundness test vi. Furthermore, in addition to muddle and unnecessary repetition, as I have commented at paragraph 3.3 above, in many cases the splitting and ordering of policies into City-wide and Area-spatial policies tends to separate land-use planning and the implementation of other strategies from locational considerations. Thus whilst it has spatial elements, the Core Strategy is not clearly a spatial plan.
- 4.4 I raised these concerns with the Council at the Exploratory Meeting and suggested that it should consider changes that would address these aspects of unsoundness of the Core Strategy. In response it has produced numerous changes, which are contained in [ED25 A-F]. Some help reduce repetition of description of the settlement pattern in the text contained in part 3 of the DPD, which contains the Area policies, and repetition of policy detail, but they also introduce additional cross-referencing text. This should not be necessary if the policies flowed logically from the strategy, vision, challenges. I have, therefore, mainly rejected those suggested changes.
- 4.5 As discussed at the hearing sessions on this matter, these weaknesses in the structure of the Core Strategy would not have occurred if the SLDF Vision Strands and Objectives had been directly translated into policies. In effect, the tandem 'Spatial Vision' in Chapter 4 of the DPD is the required place-making Spatial Strategy arising from the SLDF Vision Strands and Objectives.
- 4.6 Thus, in order to make the Core Strategy sound having regards to the coherence of its structure, the references to 'Spatial Vision' in Chapter 4 of the DPD should be changed to Spatial Strategy and consequential changes should be made to the whole of Chapters 1-4. In order that the policies then logically flow from the

Objectives, Parts 2 and 3 of the DPD should be merged and re-ordered to reflect the 7 strands of the SLDF Vision, which is set out at paragraph 3.4 of the Core Strategy. Numerous consequential changes to the text, formatting and the deletion of repetitious supporting text throughout the Core Strategy are also required. These are listed in Annex A of this report as; **(IC2, IC4 – IC8, IC10 IC12- IC27, IC31, IC88 and PC45)**.

- 4.7 Appendix A of the Core Strategy, which shows the relationship between the submitted policies, the objectives and options, should also be amended to more accurately link each of the policies to its related Objectives and it should be re-ordered to reflect my recommended re-structuring of the Core Strategy **(IC28)**. Appendix B lists the Core Strategy Background Reports and should be amended to delete reference to 'Part 3' and re-numbered as the sixth Appendix **(IC72)**. An Appendix, which shows the amended structure for the Core Strategy and the links between the policies and the SLDF Vision strands, should be added to the Core Strategy as its fifth appendix **(IC11)**, and based on this, a new contents page should be provided at the beginning of the document to replace the existing. All of the policies and appendices should be re-numbered using a simple reference system **(IC68)**. Paragraphs should also be re-numbered throughout the DPD **(IC69)**.
- 4.8 In addition, it is clear from this re-structuring that there are duplications between policies, which should be removed by amendment to Policies: SB4, SS4, ST3, SCC3, SLD1, and SSV1. **(PC186, PC188, PC189, PC191, PC192, PC199, PC206, PC216, PC223 and PC229)**. All of these changes are necessary to make the DPD sound, and are detailed in Annex A of this report. None add or remove overall policy detail so that although in terms of editing they appear substantial, they do not require further SA or public consultation to be undertaken. Other similar changes that cumulatively remove minor instances of repetition are endorsed and detailed in Annex B of this report.
- 4.9 The Core Strategy remains long and contains much unnecessary policy and supporting textural detail. Ideally substantial further editing could be carried out to reduce this repetition, the number of policies and the overall length of the DPD, but these additional amendments would be 'improvements' rather than changes going to the heart of the soundness of the plan. Thus I have neither recommended nor endorsed such other amendments, unless they specifically aid clarity and/or consistency. However, whilst this DPD, even in its recommended changed form should not serve as a template for others to follow, the significant number of detailed policies that are included within the Core Strategy should, in the case of the Sheffield LDF, enable the production of a very short, succinct City Policies DPD that contains only a very limited suite of development management policies, in contrast to the Preferred Options for City Policies, which contains over 100 policies [CD14]. To make the DPD more user-friendly with reference to its overall length in may be helpful to publish the Appendices as a separate volume 2 of the Core Strategy.

The Consistency of the Core Strategy

- 4.10 Since the Core Strategy is the predominant DPD within the Sheffield Local Development Framework (SLDF) and the first of its suite of DPDs to be submitted for examination, the question of consistency with other DPDs does not arise. However, in order to clarify the pre-eminence of the Core Strategy within the SLDF, its paragraphs 1.4, 3.6 and 4.1 should be amended to clearly state this. **(PC44 and PC50)**.

- 4.11 Generally the policies and the supporting text are consistent, both within and between policies but there are some exceptions, which I highlight below and in sections 5 of this report, that should be corrected to provide necessary clarity and consistency within the Core Strategy.
- 4.12 For example, the sub-title preceding paragraph 7.2 and the title of Policy SS1 refer to 'Shopping and Leisure in the City Centre'. However, both the text and the Policy also refer to Meadowhall, which is an out-of-centre, non-food retail development of regional significance. Both titles should be amended to refer to the, 'City-wide distribution of Shopping and Leisure', in accordance with **(PC66)**.
- 4.13 From the evidence I am satisfied that the Objectives of the Core Strategy are generally mutually compatible and relevant to its key ambitions for Sheffield to become a city that is both transformed and sustainable. In some cases there may be balances to be struck in applying them, but except for Objective S11.3, which refers to reducing surface water run-off, I do not consider them to be inherently incompatible. I recommend that the wording of S11.1 be amended to rectify inconsistency with Policies SB3 and SB4. Making this change **(PC1)** would also more closely reflect national policy contained in PPS25.
- 4.14 In addition, there are some instances of inconsistency/tension between a Strategic Objective of the Core Strategy and an associated policy or its supporting text. Such an example, which is acknowledged in the Core Strategy at its paragraph 7.7, is the priority given to the free flow of traffic through District Centres on key routes over Objectives listed at paragraph 3.13, which amongst other aims, seek to sustain, restore or create vital and successful neighbourhoods to support local communities. To address this conflict and to make the Core Strategy sound paragraph 7.7 should be changed to clarify that traffic takes priority on the key routes, but not within the Centres themselves, as detailed in **(IC39)**.
- 4.15 Policy SCC11 refers to the open spaces and riversides in the City Centre and seeks to provide and enhance a network of informal, public open spaces, particularly at locations specified in the Policy. In addition, Policy SCC11 informs that improvements will be made to the environment and accessibility of all rivers in the Centre. For consistency with Objective S13.1, which refers to the enhancement of watercourses generally, this part of the Policy should be amended to also refer to the canals and canal-sides within the City Centre, as set out in **(PC20)**.
- 4.16 The sub-title preceding paragraph 22.2 and the title of Policy SMW1 refer to 'Employment and Services for People Living in Mosborough/Woodhouse'. As worded, it is inconsistent with the approach of other similar policies and would be impossible to implement. The words, 'People Living in' should be deleted **(IC33)**. Also the title of Policy SSW1 should be changed to more clearly reflect that it concerns housing development in the South Western area, as detailed in **(IC32)**.
- 4.17 In order to remove an apparent internal inconsistency between paragraph 4.25 of the Spatial Strategy and Policy SST1, which refers to 'Jobs and Housing in Stocksbridge/Deepcar', **(PC60)** is necessary. This will clarify that although the overall number of jobs in the area is declining, local job opportunities will be promoted.
- 4.18 Several minor amendments and/or additions are required to make the Key Diagram and the text of the Core Strategy mutually consistent. These are described in the following changes **(PC393-PC400)** to the Key Diagram and

others that I refer to elsewhere in this report. Complementary changes to the text of the Core Strategy are set out in changes (**PC56, PC57** and **PC61**).

- 4.19 Perceived aspects of more fundamental inconsistency within the Core Strategy includes the balance between jobs and houses, and provision for housing in the greenfield area of Owlthorpe versus policies that seek to protect the countryside around Sheffield. I consider and make recommendations on these matters in sections 5 of my report, where I consider the appropriateness of the policies and proposals of the Core Strategy.
- 4.20 With reference to cross boundary issues, Sheffield is adjoined by another region; East Midlands and is closely related to several other local planning authority areas including; Chesterfield, Barnsley, Rotherham and Doncaster, and the Peak District National Park Authority. The evidence indicates that Sheffield enjoys good joint working relationships with its neighbours. For example, the SHLAA has been produced jointly with Rotherham Council and there is joint working under-way on the production of a sub-regional Affordable Housing Delivery Plan. There is also evidence of joint working between authorities on major transport initiatives, such as the Halfpenny Link, between Rotherham and Sheffield and in other policy areas. I am satisfied that all cross boundary issues that go to the heart of the soundness of the Core Strategy are satisfactorily addressed.
- 4.21 **I conclude that the structure of the Core Strategy is incoherent and that it is excessively repetitious. Its policies do not generally relate clearly to the Core Strategy Objectives and in many cases the strategic planning elements of the policies are separated from locational considerations, thus they are not clearly spatial. There are also some internal inconsistencies within the Core Strategy. As a consequence, it is unsound. However, it can be made sound in these regards provided that it is changed in accordance with the following changes, the full details of which are given in Annex A to this report: (IC2, IC4-IC8, IC10-IC28, IC31-IC33, IC39, IC68, IC69, IC72, IC88, PC1, PC20, PC44, PC45, PC50, PC53, PC56, PC57, PC60, PC61, PC66, PC186, PC188, PC189, PC191, PC192, PC199, PC206, PC216, PC223, PC229, and PC393-PC400) inclusive.**
- 4.22 To avoid confusion I suggest that the above recommended editing changes are made after all other changes recommended in this report have been made.

CONFORMITY, EFFECTIVENESS, IMPLEMENTATION AND FLEXIBILITY

- 5.0 In this section of my report I consider if the policies and proposals of the Core Strategy conform to national planning policy, represent the most appropriate in all the circumstances, are founded on a robust and credible evidence base, and if they are deliverable and reasonably flexible to enable the Core Strategy to deal with changing circumstances. I do so in terms of the following main matters discussed at the hearing sessions of the Examination:
- Economic transformation
 - Housing market transformation
 - Provision for open space
 - Sustainable transportation measures
 - The natural environment and distinctive built heritage of Sheffield
 - The global environment, climate change, renewable energy and waste management
 - Implementation, delivery and monitoring

5.1 Economic Transformation

Main Matter - Whether the policies of the Core Strategy for achieving the economic transformation of Sheffield are consistent with national and regional policy, the most appropriate and based on a robust evidence base, with particular reference to; retail and built leisure, manufacturing and warehousing, and offices.

a) Retail Development

- 5.1.1 The Core Strategy policies for shopping are based on a 3-tier hierarchy of centres; City, District and Neighbourhood, serving a range of catchment populations. At the Emerging Options Stage, a higher level of 'town centre', between the City Centre and District Centres was consulted upon for the larger or more detached centres, such as Hillsborough, Crystal Peaks, Stocksbridge and Chapeltown. This would be consistent with the 4 - level classification of 'town centres' described, but not prescribed, in Annex A of PPS6. However, it was rejected by the Council in favour of a 3-level classification, because there is no apparent, practical advantage in maintaining a higher-tier of District Centres for retail purposes. I agree with the Council that a 2-level District Centre hierarchy could restrict the flexibility of allowing large-scale development in the smaller District Centres where this may be beneficial to allow regeneration, fill gaps in the network and to improve the distribution of access to facilities. Policies SS1, SS2 and SS3 respectively set out the city-wide retail strategy for each of the three types of centre, and for Meadowhall. In addition, Policy SCC3 expands on retail development in the City Centre, several other Area policies refer to some of the District Centres listed in Policy SS2 and Policy SLD1 refers to Meadowhall.
- 5.1.2 Stocksbridge and Chapeltown are described as 'Principal Towns' in the RSS. However, its hierarchy is one of settlements and not centres. Although Stocksbridge and Chapeltown are separate from the built-up part of Sheffield their centres perform the same function as the sub-urban District Centres identified in SS2 within the City's built up area. They are of similar size and have the same function and 'local focus' (RSS: YH5) as the other District Centres. I therefore consider that they are appropriately classified. Consequently, I conclude that the 3-level retail hierarchy of the Core Strategy is in line with national and regional retail policy and that it is the most appropriate for Sheffield. But for accuracy, reference in paragraph 4.25 of the Core Strategy to the designation of Stocksbridge and Chapeltown in the RSS should be amended from 'main towns' to 'Principal Towns' as detailed in (**PC3**).
- 5.1.3 Policy SS1 refers to the city-wide distribution of shopping facilities and affirms the priority attached to a major regeneration initiative in the form of the New Retail Quarter in the City Centre and the implications for large shopping developments in other locations in Sheffield. This general approach of giving pre-eminence to the City Centre is in line with national and regional policy. However, for consistency with PPS6, all references in Policies SS1 and SCC3 and their supporting texts to 'Core Retail Area' should be replaced with 'City Centre Primary Shopping Area', as detailed in (**PC68, PC100, PC101, PC102, PC103 and PC113**).
- 5.1.4 Prior to 2014 I am satisfied that the New Retail Quarter will appropriately consolidate the City Centre shopping area and improve its range and quality of shops and facilities. Evidence on this is set out in [BD03] in paragraphs 2.89-2.92. In addition, more recent, albeit retrospective, evidence produced by planning consultants for the New Retail Quarter CPO Inquiry [PD37], which up-

dates the Citywide Quantitative Study of Comparison Goods [BD27], confirms that Sheffield City Centre is continuing to under-perform in terms of yields, vacancy rates, and other measures. This indicates not only the qualitative need for City Centre retail development to arrest the decline, but also that there will be capacity for the City Centre to absorb spending to make up the shortfall – i.e. to satisfy a quantitative need.

- 5.1.5 This identified additional retail capacity will be taken up by retail development opportunities that will become available on 'The Moor', which adjoins the Core Retail Area. The first phase of redevelopment of 'The Moor', which will include a new Markets building and 100,000 sq ft of refurbished retail floorspace has already begun with the clearance of several buildings and was expected to be completed in 2010 [BD10]. Further phases of this redevelopment are planned to follow.
- 5.1.6 Taking account of these planned major City Centre retail developments I am satisfied that there is no need for further major out-of-centre non-food retail development until the New Retail Quarter is functioning successfully.
- 5.1.7 With reference to Meadowhall, Policy SS1 indicates that it will remain 'at around' its present size. This is in conformity with RSS Policy E2 [RD23]. However, for internal consistency, paragraphs 4.13 and 7.3 of the Core Strategy should be amended to reflect that the Meadowhall shopping centre will remain 'at around' its present size and reference to 'Part 3' of the Core Strategy should be omitted (**PC54 and IC70**).
- 5.1.8 I consider that Policies SS1 and SLD1 are sufficiently flexible concerning development at Meadowhall because they allow it to redevelop and adapt without significantly increasing its already considerable floorspace.
- 5.1.9 Policy SS1 also informs that major non-food retail development will not occur outside the Core Retail Area or the District Centres and their edges. However, paragraph 7.4 of the supporting text to Policy SS1 unnecessarily and inappropriately delegates decisions on exceptions where this may be acceptable to the forthcoming City Policies DPD. Furthermore, the Policy does not indicate what and when provision for non-food retail development needs post 2014 will be made, when it was anticipated that the New Retail Quarter will be fully operational.
- 5.1.10 To address these shortcomings and to make the Policy sound in terms of tests vii and viii a sentence should be added to the supporting text at the end of paragraph 7.3 of the Core Strategy, as incorporated in (**IC70**), to clarify that in this context, major non-food development will usually consist of increases in gross floorspace of more than 2,500 sq m, this being the threshold above which PPS6 requires impact assessments for out-of-centre developments. In paragraph 7.4 of the Core Strategy it should be clarified that decisions on out-of-centre proposals will be taken in the light of current national retail policy and local considerations, as set out in (**IC47**), which incorporates (PC70).
- 5.1.11 In making this recommendation I acknowledge that the retail evidence base for the Core Strategy is short-term, but with regards to consideration of major non-food development, I consider that it is adequate at least until 2014. The Council indicates in its Retail and Leisure Background Report [BD03] that its update and review is necessary prior to then, but my recommended change (IC47), which refers to PPS6, provides an adequate decision making context for post 2014

proposals, or until evidence on retail need in the medium and long term is updated.

- 5.1.12 Turning now to the Policies for District Centres, Policy SS2 lists them and identifies Chaucer as a proposed new District Centre. It informs that they will be encouraged in fulfilling their role of providing for everyday needs with a range of retail, leisure and community facilities. The Policy also states that Centres at Darnall, Spital Hill and Manor Top will be improved and, where possible, expanded. In my opinion, the function described for these Centres reflects the role defined in PPS6.
- 5.1.13 Paragraph 7.6 of the supporting text to Policy SS2 goes on to explain that Sheffield will need new food superstores to capture predicted increased spending on food over the plan period. The evidence contained in [BD03] and [PD24/A] indicates that four superstores are likely to be required by 2016 and also that these are best located in the District Centres as their scale would be too great for the Neighbourhood Centres. The reasons for prioritising in the Policy the four particular District Centres for improvement/expansion is linked to regeneration objectives, which accords with guidance given at paragraph 2.35 of PPS6. However, since the Core Strategy is not intended to be site specific, I consider that paragraph 7.6 is misleading in stating that, "sites for superstores have been identified in some of the District Centres in the Housing Market Renewal areas". As I have recommended at (**IC48**) this should be changed to say that, 'the District Centres prioritised for improvement and, where possible expansion, are within the Housing Market Renewal areas'.
- 5.1.14 The policy text of SLD6, which refers specifically to the Darnall District Centre, adds little to the policy provided in SS2 for this Centre and I have several other concerns regarding its soundness. Its supporting text at paragraph 16.26 specifies that expansion of this Centre will be achieved by intensification of uses through redevelopment of the core of the existing Centre. This is detail, which if sound, should be contained in the Policy text. However, in the absence of robust evidence to justify this approach, which would preclude an alternative option to expand the boundary of the Centre, possibly to encompass the B & Q retail development, the Policy is unsound in terms of soundness tests vii and ix.
- 5.1.15 In order to make the Core Strategy sound having regard to these tests the Policy could be deleted, but this would result in an inconsistent approach regarding the other District Centres highlighted in Policy SS2 for expansion. I therefore recommend that Policy SLD6 and its supporting text be changed as set out in (**IC49**), which would enable flexibility of means of expansion of this Centre, when a robust assessment to identify the most appropriate approach has been carried out. The sequential test of PPS6 would ensure that sites within the core of the Centre are developed first and further detail on this matter could be included in the forthcoming City Policies DPD and the SLDF Proposals Map, after the retail needs, capacity and opportunities for the Centre have been further and fully investigated.
- 5.1.16 Policy SNE4 makes proposals for District Centres at Firth Park, Spital Hill and Chaucer. With regards to the first two of these Centres the Policy is very general, but is not so vague as to make it unsound, and is justified by evidence contained in [PD24] and [BD14] (North East Urban Area Background Report)]. Concerning Chaucer, I am satisfied by the available evidence contained in [BD03], [PD24] and [BD14] that its designation is justified to plug a deficiency in the existing network of District Centres by promoting an existing centre within a deprived area

(Buchanan Road) to function at a higher level in the retail hierarchy. Furthermore, this approach accords with PPS6. Although assertions have been made in representations, from the evidence, I do not consider that the Policy would be harmful to other District Centres including Spital Hill and Hillsborough.

- 5.1.17 Proposals for Manor Top District Centre are contained in Policy SSE1. Here my concern is that the supporting text to the Policy gives confusing messages by stating that whilst ideally expansion of the Centre should include a superstore, the local transport network cannot accommodate such an option without adversely impacting on public transport services through the Centre. Secondly, I am not convinced by the Council's evidence, both at the Core Strategy submission stage and presented for the hearing session, that it can be categorically stated that the highways network capacity issue is insurmountable. In order to make it sound the supporting text of the Policy should be changed in accordance with **(IC51)**, which highlights serious highways considerations associated with a superstore development, but does not preclude a solution being found.
- 5.1.18 Policy SMW1 informs that shopping provision at Crystal Peaks Shopping Centre will be maintained at around its current size. This has been objected to on the basis that it is inflexible and unsupported by robust evidence of retail need and capacity within its catchment, but I do not consider that criticism is justified.
- 5.1.19 Crystal Peaks is one of the largest District Centres in the City and the Sheffield Retail Study [PD24] concludes that residents of the zone around Crystal Peaks are well served for food shopping. The Centre is one of two in the city that show the highest retentions of main food shopping trips to District Centres and large food stores contained within the zone itself. For non-food shopping, the Study notes that Crystal Peaks has a large amount of comparison goods floorspace and contains a high proportion of national multiple retailers and 'competes, to some extent, with the City Centre, particularly in terms of clothing and footwear, rather than fulfilling a complementary role'.
- 5.1.20 I consider that maintaining this District Centre at around its present size is consistent with PPS6 paragraph 2.09, which advises that local authorities should consider the network of centres to ensure that it is not overly dominated by the largest centres, and advises local authorities to promote a more even distribution of Town Centre uses, so that peoples' everyday needs are met at the local level. The inclusion of the word 'around' in the Policy allows some flexibility in terms of need for future development and changing retailing expectations.
- 5.1.21 Policy SS3 promotes new development for local shops and community facilities in the Neighbourhood Centres to serve the everyday needs of the community. In response to my Matters and Issues paper [ED24] the Council has stated that it intends that the City Policies DPD will build on this Policy to indicate the appropriate scale of development in terms of maximum floorspace, in line with paragraph 2.42 of PPS6. For clarity and to make the Policy sound, this information should be added to the supporting text at paragraph 7.9 of the Core Strategy, as detailed in **(IC52)**.

b) Built Leisure

- 5.1.22 Policy SS4 identifies where large leisure and cultural developments should be located and the sequence of their preferred locations. Prioritising the City Centre as the preferred location for the development of cultural and leisure facilities is appropriate and accords with PPS6, since cultural and leisure facilities are main town centre uses. It also gives implicit support to development of cultural and

leisure facilities in the two universities, because most of the land covered by the universities is within the City Centre or within 300 metres of its boundary, so is edge-of-centre, in terms of the definition in PPS6 Annex A, Table 2. Similarly consistent, Policy SCC4 also promotes such development in the Cultural Hub area around Tudor Square and other cultural facilities such as the Crucible and Lyceum, which have City Centre locations.

- 5.1.23 Policy SS4 also informs that major leisure facilities will be located in the Lower Don Valley, if no sites are suitable in the City Centre or at its edge. Policy SLD1 expands on the location of major leisure facilities in the Lower Don Valley by identifying close to the interchange at Meadowhall as being a suitable location for those developments that cannot be accommodated within the City Centre. For consistency with Policy SS4 the words, 'or at its edge' should also be added, as detailed in **(IC53)**.
- 5.1.24 I consider that Policy SLD1 is consistent with the sequential approach of PPS6 because the transport interchange at Meadowhall is highly accessible from all areas of the City, as is required for leisure facilities by paragraph 2.49 of the PPS, so provided that the remaining PPS6 tests of need, scale, sequential approach and impact are fulfilled, large-scale leisure development would be appropriate here. The word 'may' in paragraph 2 of Policy SLD1 indicates that development is contingent on these tests being fulfilled.
- 5.1.25 **To summarise, I conclude that the policies and proposals of the Core Strategy for retail, large scale leisure and cultural development are unsound, but can be made sound provided that the following changes are made, full details of which are given in Annex A of this report: (PC3, PC68, PC54, PC100, PC101, PC102, PC103, PC113, IC47, IC48, IC49, IC51, IC52, IC53 and IC70).**

c) Manufacturing and Warehousing

- 5.1.26 Strand 1 of the Spatial Vision to transform Sheffield is to achieve sustainable economic prosperity and to make the city area attractive to business and new investment. The intended strategy to achieve this step-change is partly through the raft of policies contained in the Core Strategy which promote improvements to the environment generally and to the transportation infrastructure and services to support the release of employment land that may otherwise remain unused. In addition, Policies SB1, SB2 and SB4 seek to ensure that sufficient employment land is available to enable the economic transformation of Sheffield.
- 5.1.27 Policy SB1 states that provision will be made for 43.5 hectares of land per year for new, expanding and relocating business and industry, and it provides a more detailed breakdown of this provision in terms of land for B1, B2 and B8 uses. The Policy also intends that a 5-year supply of each type of employment land, free from major constraints and available, will be maintained at all times. To 2026, this amounts to a total requirement for 870 ha of land, of which 780 ha would be for general industry (B2) and distribution (B8). Table 6.1 of the Core Strategy indicates that around half of the total amount was available in 2006; the remainder is anticipated to become available through the re-development of existing employment sites.
- 5.1.28 The overall requirement anticipated by Policy SB1 is around double the past average take-up of land and, with particular reference to provision for land for B2 and B8 uses, appears to be significantly greater than the requirement indicated in the RSS [RD23], which at its Table 11.1 refers to a potential annual job growth in

all sectors for Sheffield as 4,400, and with reference to general industrial and distribution uses (Table 11.2), an annual job growth of 410 in these sectors. This indicates an apparent inconsistency between Policy SB1, which allocates 39 hectares of land annually for these uses and the RSS, which informs that the Region as a whole has more land allocated for B2/B8 uses than is likely to be required in the future. Furthermore, part A (2) of RSS Policy E3 informs that plans should take account of the ongoing restructuring and modernisation of the manufacturing sector and the guidance on land for industrial uses is set out in Table 11.3. For Sheffield, this indicates a potential net change in additional land for general industrial and distribution uses of 80 hectares for the period 2006-2021.

- 5.1.29 However, it is difficult to make direct comparisons between the RSS employment land requirements and the amount to be provided by the Core Strategy because it is clear from the evidence submitted by the Council [BD02 Table 3] and in representations [CD20] that there are numerous accepted methods of calculation, resulting in a very broad range of overall employment land requirement. Also, it is difficult to ascertain from the Core Strategy intended supply, how much would contribute to the 80 ha net addition anticipated by the RSS. Although the Council made strenuous representations at the RSS EiP objecting to what it considered being an under-provision for employment land for the city, their objections were not addressed in the published RSS. The Council's justification for the employment land provision given in Policy SB1 is based upon the findings and recommendations of the Employment Land Demand Assessment for Sheffield produced by Arups for the Council in 2006 [BD17, BD18, BD19] and is based on the projection of floorspace take-up.
- 5.1.30 I accept that in principle, the floorspace methodology may be an appropriate means of assessing future employment land requirements. I am also satisfied that its methodology is based on robust and comprehensive research undertaken in line with the Government's guidance on Employment Land Reviews [ND20] and policy advice set out in the RSS. Also, that the Council has produced extensive evidence to support the assertion that a requirement figure that represents a significant increase on past take-up rates is both desirable and necessary to enable the continued economic transformation of Sheffield. However, the appropriateness of the land requirement projection depends upon the findings of the Employment Land Assessment for Sheffield being correctly applied. I am not convinced that they have. Whilst employment land take-up has recently significantly increased [BD17], I remain unconvinced that the Council's optimism for double that rate is justified and will be sustained, especially taking account of the recent down-turn in the economy. This could result in the sterilisation of a significant amount of unused employment land that could otherwise be used. Alternatively, if the Policy SB1 provision is correct, the use of all of this land for employment purposes could result in the creation of significantly more jobs than anticipated by the RSS and would result in an imbalance between jobs and housing provision, contrary to an aim of the RSS. In either scenario I conclude that Policy SB1 is unsound.
- 5.1.31 However, subsequent to the second hearing session at which this matter was discussed and a re-examination of its Consultant's reports, the Council has submitted further written representations and suggested changes to Policy SB1, because it has concluded from the discussions at the hearings that the Consultant's floorspace-based forecasts are not robust. This supports my conclusion that Policy SB1 is unsound as discussed in scenario 1 above.

- 5.1.32 The Council's re-calculated requirement, based on a methodology that was used at the Emerging Options stage and which allows a 50%, rather than the 100% margin above previous take-up rates is for 29 hectares per year, in contrast to the 43.5 hectares to be provided by Policy SB1. Up to 2026 this would translate to 450 hectares being required for B2/B8 uses. The capacity required would be 190 hectares, which is anticipated to come from the redevelopment of existing employment sites. This would amount to a requirement for some 280 hectares less employment land during the period 2006-2026 than would be required by submitted Policy SB1.
- 5.1.33 It is clear that there are many differing methodologies for forecasting employment land provision that result in significantly different requirements. However, from all of the written evidence and from discussion at the hearings I conclude that the employment land provision now suggested by the Council, which is based on the following principles, is founded on robust base data that has been correctly applied and is the most appropriate:
- the requirement figure should not perpetuate the past constraint on meeting demand but should support the economic transformation objectives of the Council;
 - flexibility should be allowed to help maintain the up-turn experienced in recent years;
 - adequate provision should be made for 'churn', with replacement of old floorspace to support the renewal of indigenous businesses.
- 5.1.34 The Council's suggested changed Policy SB1 and supporting text also overcomes other weaknesses of submitted Policy SB1, which refers to 'provision', but is not clear about how this would happen. The suggested re-wording of the Policy and its supporting text clarifies that the scale of the requirement does not mean looking for land beyond the existing employment areas on any major scale. Also, that allocations would cater just for a 10-year period and that the sites allocated would be a focus for additional action to make them ready for development, thus addressing previous qualitative constraints. In addition, the suggested amended Policy is explicit that significant future capacity would be achieved by safeguarding suitable land for employment that becomes available through demolition of existing premises.
- 5.1.35 The suggested new supporting text clarifies that 'churn' would remain an important source of new capacity by explaining that where redevelopment can be anticipated, this should be taken into account in providing for a five-year supply. In line with the RSS, this would help to moderate the amount of unused employment land that is required at any one time without prejudice to the aims of the Policy and it would ensure that the RSS objective of balancing job creation with housing provision is not prejudiced. The suggested amended supporting text also confirms that where qualitative constraints cannot be overcome then re-allocation of the land would be appropriate.
- 5.1.36 Whilst it is helpful for making allocations to specify the desired amount of land required for each of the broad employment uses, for flexibility in the interpretation of Policy SB1 in making decisions on planning applications, it should clarify that other sui generis general industrial/processing uses, such as waste processing, are included within the provision in category (c) of the Policy. I have incorporated this change in my recommended change to Policy SB1 and its supporting text.

- 5.1.37 I conclude that the Core Strategy is unsound having regards to its Policy SB1, but the Policy can be made sound, provided that all of the changes to that I recommend above are made. These are consolidated in **(IC56)**.
- 5.1.38 Turning now to Policy SB2-Business and Industrial Development on Brownfield and Greenfield Land, taking into account Sheffield's legacy of old industrial sites I consider that it is appropriate that Policy SB2 gives priority to their re-development for new employment purposes. However, its allowance of 5 ha or 2.5% within a five year period for such development on greenfield land provides necessary flexibility to provide a choice of sites and to improve the attractiveness of the portfolio of available sites. I conclude that in principle, Policy SB2 meets all of the soundness tests. However, to reflect the reduction in the employment land requirement that I have recommended in (IC56), the allowance for greenfield development should be reduced to 4 ha, as I recommend in **(IC86)**.
- 5.1.39 In line with PPS12, Policy SB4 identifies 'broad' locations for manufacturing, distribution/warehousing and other non-office businesses that are again referred to in the Area policies. From the evidence I am satisfied that these are generally the most appropriate. However, I consider that two of the descriptions of locations are unnecessarily too site specific, to the extent that detailed consideration at the City Sites allocations stage and guidance on mixed use of sites in the City Policies DPD would be pre-empted. These are the references in the Policy to the Claywheels area and to Holbrook/Oxclose.
- 5.1.40 At paragraph 4.8 of my report I have recommended (PC188) which deletes locational references that are repeated in the Area policies. I also recommend that reference to the 'Claywheels area' is deleted from Policy SUD1 and is replaced with the more general location description of the 'Upper Don Valley', as set out in **(IC59)**.
- 5.1.41 Similarly, Policy SMW1 is too specific in its reference to 'Drakehouse and Holbrook/Oxclose'. As I have detailed in **(IC60)**, these references should be changed to 'the east side of Mosborough'. For clarity, the reference in part (b) of Policy SMW1 should also be changed to; 'at the edge of the Crystal Peaks District Centre', as detailed in **(IC61)**.
- 5.1.42 These suggested changes would not prevent these two particular locations from being allocated or safeguarded as employment land in the City Sites DPD, if from the evidence submitted to its examination, such allocations were the most appropriate. However, the recommended changes to the Policies would enable the allocation of land at these sites either partly or in their entirety for other purposes if the evidence indicates other uses to be most appropriate, thus providing flexibility.
- 5.1.43 **To summarise, I conclude that the policies and proposals of the Core Strategy for manufacturing and warehousing are unsound, primarily because Policy SB1 makes significant over-provision for employment land and in parts it is too prescriptive and inflexible. However, these policies can be made sound provided that all of the following changes are made: (IC56, IC59, IC60, IC61, IC86 and PC188), full details of which are given in Annex A of this report..**

d) Office Development

- 5.1.44 Policy SB3 identifies the main locations for office development and more specific policy guidance is provided in the Area policies. In line with PPS6 and the RSS, Policy SB3 seeks to direct new office development in accordance with the

sequential test with most (65%) to the City Centre and its edge. The supporting text at paragraph 6.11 of the Core Strategy clarifies that Meadowhall and Crystal Peaks have nearby public transport interchanges, and at Tinsley Park office development would support continuing initiatives to serve the area by public transport. However, to more transparently reflect PPS6 and RSS Policy E2 the order of the centres listed should be changed to place Hillsborough and Crystal Peaks, Meadowhall and Tinsley Park as (d), (e) and (f) respectively, as detailed in **(IC62)**.

- 5.1.45 With reference to Meadowhall and to reflect RSS Policy E2, a new sentence should be added to paragraph 6.11 of the supporting text, as set out in **(IC63)**, that would clarify that proposals for office development should not be large in scale and will be assessed in line with PPS6. To reflect PPS6 Policy SLD2 should be amended to remove 'significant' before 'office development located only south of Europa Way', as indicated in **(IC65)**.
- 5.1.46 Evidence for the 65% requirement within the City Centre is set out in [BD02] in paragraphs 4.112 to 4.122. From this I am satisfied that the relative split is the most appropriate and is achievable.
- 5.1.47 The mechanisms for delivery and monitoring the Policy are explained in [BD02], and the Annual Monitoring Report [CD10] will indicate progress towards achieving the 65%, given knowledge of schemes under construction and with planning permission. The intention is that at the start of each financial year it can be demonstrated that at least 65% the office floorspace with planning permission (including that which is under construction) is located within or at the edge of the City Centre. To aid clarity and implementation of the Policy I consider that this explanation of delivery of Policy SB3, as set out in **(PC65)** should be included in its supporting text at paragraph 6.12. Clarification should also be added to paragraph 6.12 that the scale of individual proposals for office development contributing to the remaining 35% will be assessed in line with PPS6, as detailed in **(IC66)**.
- 5.1.48 Policy SCC2 introduces the concept of Priority Office Areas, which are also shown on the Key Diagram, as being the most important City Centre locations for offices. From the evidence, I am satisfied that they are the most marketable areas for office development in the city and should be protected almost exclusively for such use to develop the commercial and economic roles of the City Centre further, over the Core Strategy period. However, since Policy SB3 deals with the strategic approach to office development and recognises the city-wide importance of the City Centre as an office location, for clarity and coherence, reference to Priority Office Areas and to Policy SCC2 should be made in the supporting text to Policy SB3 at paragraph 6.10, based on **(PC64)**, which I refer to as **(PC64A)** in Annex A of this report.
- 5.1.49 **My overall conclusion is that the Core Strategy is unsound with regards to its policies for achieving the economic transformation of Sheffield, primarily because it makes significant over-provision for employment land and fails to meet soundness tests iv, vii and ix. However, it can be made sound in respect of its retail, major leisure and employment policies provided that all of the following recommended changes are made: (PC3, PC65, PC68, PC100, PC101, PC102, PC103, PC113, IC47, IC48, IC49, IC51, IC52, IC53, IC70, IC56, IC59, IC60, IC61, PC188, IC62, IC63, IC65, IC66, IC86 and PC64A). The precise details of these necessary changes are set out in full in Annex A of this report.**

5.2 HOUSING MARKET TRANSFORMATION

Main Matter - Whether the policies of the Core Strategy for transforming the Sheffield housing market are consistent with national and regional policy, the most appropriate and based on a robust evidence base, with particular reference to; housing supply, distribution and release strategy, affordable housing, housing mix, density and provision for other special groups.

Housing Supply

- 5.2.1 Policy SH1 sets out numerically, in three phases, the scale of future housing provision based on the anticipated gross requirements of the draft RSS up to 2026. It informs that sufficient sites will be allocated to meet the housing requirement to at least 2020/21, ten years from the anticipated adoption date of the City Sites DPD (allocations). Also, that the sites will be released in two phases; 2007/08 to 2015/16 and 2016/2017 to 2020/21. The Policy finally informs that a 5-year supply of housing land that is available and free of major constraints will be maintained at all times. The associated Table 8.1a tabulates this and shows a total requirement for 33,350 dwellings for the period 2004 to 2026, including a replacement allowance for 400 dwellings per year during 2004 to 2016 (4,800 total). Table 8.1b tabulates the sources of supply and indicates a total supply of 37,100 dwellings during 2004 to 2026.
- 5.2.2 However, this includes 8,600 dwellings, around 23%, arising from windfalls and paragraph 8.3 of the supporting text to the Policy confirms that windfalls are included in the supply figures. Reference is made to paragraph 59 of PPS3 for justification.
- 5.2.3 The Housing Background Report [BD04] informs that the local circumstances being relied upon to justify windfalls in the case of the Sheffield LDF are three-fold. Firstly, that Challenge 3 and associated Objectives of the Core Strategy are to strengthen the failing housing markets of the north and inner south-east of the city and to focus development on previously developed land and buildings. Secondly, that there is consistent evidence that an average of around 500 windfall dwellings have been granted planning permission during the period 1998 to 2007 and that there is no evidence to suggest that this trend will not continue in the future. Thirdly, that with reference to the Inspector's report on the Epsom and Ewell Core Strategy, there is a similar post PPS3 precedent for including a windfall allowance in the supply figures.
- 5.2.4 However, I am not convinced that the evidence robustly justifies a windfall allowance in the case of the Sheffield Core Strategy. The first two reasons could apply to many other mainly urban local authority areas and the precise circumstances at Epsom and Ewell are different. Nevertheless, the Housing Background Report [BD04] indicates that actually, the submitted Core Strategy is not reliant on windfalls to meet the housing requirement to 2021 and thus the PPS3 requirement to allocate a ten year housing supply could be met numerically. Also, that broad areas for longer term provision are indicated in the Transition Areas, where there is likely to be a significant surplus of employment land in the Lower Don Valley, Stocksbridge and the north-eastern urban area. However, the Sheffield Urban Housing Potential Study (2005) [BD29], upon which this evidence is based, does not assess the sites included in the five and ten years supply in terms of deliverability and developability, as required by paragraphs 54 and 55 of PPS3. For all of these reasons, the approach of the Core Strategy for housing

supply is inconsistent with national guidance and fails to meet soundness test iv (b). I conclude that the Core Strategy is unsound in this regard.

- 5.2.5 I raised these matters with the Council at the Exploratory Meeting where it clarified that a Strategic Housing Land Availability Assessment (SHLAA) was being undertaken jointly with neighbouring Rotherham Metropolitan Borough Council, whose area falls within the same housing market area. The Council confirmed that it would be available in early 2008. I was also informed that the SHLAA would confirm that the Council could allocate sufficient deliverable and developable sites for at least a ten year period and identify general areas of supply for at least a further five years beyond. It could, therefore, retrospectively demonstrate that the Core Strategy is PPS3 consistent in these regards.
- 5.2.6 On this basis, I was satisfied that a reasonable, pragmatic approach would be to allow a suspension of the examination of the housing element of the Core Strategy until after the completion of the SHLAA. This would also enable the Council to address other unsound elements of the DPD that I refer to elsewhere in this report.
- 5.2.7 During the suspension period the RSS was published [RD23]. Its Table 12.1 sets out the required annual average net additions to the dwelling stock during 2004 to 2026, resulting in a total net requirement for 29,750 dwellings for the period 2004 to 2026 (2004-2008 @ 1,025 pa and 2008 to 2026 @ 1,425pa). In addition, the RSS indicates at Table 12.3 that a further 400 dwellings are required annually, for the whole period, to take account of clearances. This adds a further 8,800 dwellings, to make a gross requirement for 38,550 dwellings. The published RSS net requirement is generally as predicted in the submitted Core Strategy, except that it was anticipated that the higher annual rate would apply from 2010/2011 rather than from 2008. In addition, allowance for replacements in the submitted Core Strategy is for 400 dwellings pa for the period 2004 to 2016. Cumulatively, the published RSS gives rise to a gross requirement for an additional 5,200 dwellings above the number anticipated in the submitted Core Strategy.
- 5.2.8 In response to the published RSS figures the Council suggests that, for conformity, Policy SH1 should be amended to reflect the net annual requirements over 2 phases; pre and post 2008 and that for consistency with PPS3 the Policy should refer to a 5-year supply of deliverable sites. These are changes which I agree are necessary to make the Core Strategy sound. The Council also suggests that the end date of the second (last) phase should be reduced to 2024, because in its opinion it is necessary, by virtue of paragraph 55 of PPS3, to identify sufficient developable sites for only at least the first ten years. However, this suggested reduction of the timescale of the submitted Policy would be illogical for several reasons. Paragraph 1.2 of the submitted DPD sets an end date of 2026, the published RSS has an end date of 2026, paragraph 55 of PPS3 requires broad locations for future housing growth for years 11-15 to be indicated and furthermore, the suggested change mixes consideration of the scale of the housing requirement with site allocations. In addition, both the submitted and suggested changed versions of the Policy unnecessarily attempt to combine the scale of housing requirement with the release of housing land, the latter of which is the subject of Policy SH4.
- 5.2.9 To rectify these faults the Policy should be amended by; deleting its first sentence that states, "Sufficient land will be identified to enable the completion of:", by substituting the three parts of the gross requirement with the two net parts required by the RSS, by deleting reference to phasing and by clarifying that a

five-year supply of 'deliverable' sites will be maintained at all times. The Policy should also be up-dated with regards to the RSS position and the submitted timeframe should be retained. I have consolidated these changes, which are necessary to make the Policy sound, in recommended change **(IC75)**.

5.2.10 Neither the submitted nor the Council's suggested amended version of Policy SH1 makes allowance for clearances at the scale indicated in the RSS. Indeed, the Council's suggested change (PC368) halves replacement for demolitions to an average of 200 dwellings pa for the period 2008-2016. However, the evidence presented in the Council's Topic Paper [ED40] and at the hearing session to justify this reduction does not convince me that the allowance made in the submitted version of the Policy, which is based on evidence contained in [BD04] is incorrect. From that evidence, I conclude that the clearance allowance of 4,800 (some 4,000 dwellings less than anticipated in the RSS) is appropriate. I see no reason to reduce the allowance further. Consequently, I conclude that in order for the Core Strategy to be in general conformity with the RSS there is a gross requirement for 34,550 dwellings for the period 2004-2026.

5.2.11 However, this requirement should be regarded as being the minimum number required. The RSS figure itself should not be regarded as a ceiling. Furthermore, it should be taken into account that in July 2008 the Government announced that South Yorkshire was designated as a 'Growth Point' [ND21], with a net requirement in Sheffield for 12% additional dwellings for the period 2008 to 2016, which amounts to 1,368 dwellings and a total net requirement for 31,118 dwellings (35,918 gross) or 1,596 pa during that period. In addition, there is likely to be a partial review of the RSS in 2011, which is most likely to further increase the housing requirement for the city. Whilst it cannot be predicted what the scale of that increase might be, the fact that it is on the near horizon re-affirms the need for the Core Strategy to be flexible in its provision for housing land. This housing requirement is summarised in the table below. (Excluding any prediction of the numerical implications of the forthcoming partial review of the RSS).

Requirement Period	RSS Net Requirement	RSS net requirement + Growth point	Cumulative net requirement	RSS net requirement + Growth Point + replacements	Cumulative gross requirement
2004- 2008	1025x4=4100	4100	4100	4100 +(400X4=1600) = 5700	5700
2008-2014 (5 year supply of developable sites post adoption of CS)	1425x6=8550	8550+12%=9576	13676	9576+(400X6=2400)=11976	17676
2014-2019 (5year supply of developable sites)	1425x5=7125	(1425x2)+12%=3192+ (1425X3= 4275) =7467	21143	7467+ (400X2=800) = 8267	25943
2019-2026 (Long term supply)	1425X7=9975	9975	31118	9975	35918
Total	29750	31118	31118	35918	35918

5.2.12 The RSS housing requirement figure takes account of in-migration linked to economic growth [RD23], the role of Sheffield as a Regional City and that the strategic housing market includes the Rotherham area. Also, that the Joint

Economy of Sheffield and Rotherham – Executive Summary [RD25] concludes that the two areas form a single labour catchment area. I have recommended in section 5.1 of this report that the employment land supply should be reduced to bring it more clearly in line with the RSS requirement, which would ensure that this intended equilibrium is achieved. Provided that the Core Strategy housing supply is also in general conformity with the RSS, I see no reason why additional housing land should be provided in Sheffield to discourage commuting from Rotherham, as suggested in some representations.

5.2.13 I turn now to consider the housing supply. A joint SHLAA for the Sheffield/Rotherham Strategic Housing Market Area was close to completion at the time of the hearing session held on 8th September 2008, but an Interim SHLAA Report [BD40], which provides an assessment of the supply in Sheffield, was published in July 2008. Work on the SHLAA has been overseen by a Working Group which involves key stakeholders and which includes representatives from the Home Builders Federation. The Working Group has agreed the assessment in the Interim Report. I am satisfied that it provides robust evidence.

5.2.14 In summary, the SHLAA confirms that, as at 31st March 2008, there were sufficient deliverable sites to meet the housing requirement to at least the end of 2014/15 (six years post anticipated adoption of the Core Strategy). It also shows a sufficient supply of other developable sites which are capable of meeting the housing requirement to around 2021, thus numerically meeting both the national and regional housing supply requirements. This supply is compared against the requirements tabulated above as follows:

Completions 2004/05 to 2007/08

5.2.15 There were 5,428 net housing completions in the period 2004/05 to 2007/08 which is 1,325 dwellings (32.4%) above the RSS requirement (4,100 dwellings) for that period. National guidance (Demonstrating a 5-Year Supply of Deliverable Sites, DCLG, (2007), paragraph 5(i)) permits that, in calculating the 5-year net requirement, the figure may be adjusted to reflect the level of housing already delivered (within the lifetime of the current plan).

5-Year Supply of Deliverable Sites 2008/09 – 2013/14

5.2.16 Table 8 of the SHLAA demonstrates that the 5-year supply of deliverable sites was around 10,869 dwellings as at 31st March 2008. The gross requirement to the end of 2013/14 (5 years from 1st April 2009, which is equivalent to the anticipated date of adopting the Core Strategy) would be 17,676 dwellings, whereas the cumulative supply would be 16,297. This appears to indicate a shortfall of around 1,379 dwellings. However, the start date of the 5-year period of deliverable sites identified in the SHLAA starts in 2008, and does not, therefore, correspond exactly with the timeframe of the Core Strategy. Nevertheless, from all of the evidence, I am satisfied that overall there are actually sufficient sites to meet the required 5-year deliverable supply.

Supply for Years 6-15

5.2.17 Table 14 of the SHLAA shows that other developable sites (after 2013/14) have potential to accommodate around 13,880 dwellings:

2013/14 to 2015/16	9,297 dwellings
2016/17 to 2020/21	3,085 dwellings
After 2021	1,498 dwellings
Total	13,880 dwellings

5.2.18 On this evidence I am satisfied that sufficient land has been identified to enable

Requirement/ Supply Period	Supply	Cumulative Supply	RSS Net Requirement	RSS net requirement + Growth point	RSS net requirement + Growth Point + replacements	Cumulative gross requirement
2004- 2008	5428 completions	5428	1025x4=4100	4100	4100 +(400X4=1600) = 5700	5700
2008-2014 (5 year supply of deliverable sites post adoption of CS)	10869	16297	1425x6=8550	8550+12%=9576	9576+(400X6=2400)= 11976	17676
2014-2019 (5year supply of developable sites	12382	28679	1425x5=7125	(1425x2)+12%=319 2+ (1425X3= 4275) =7467	7467+ (400X2=800) = 8267	25943
Sub Total	28679	28679	19775	21143	25943	25943
2019-2026 (Long term supply)	1498		1425X7=9975	9975	9975	35918
Total	30177		29750	33118	35918	35918

the allocation of sites to meet the 6-10 year requirement for developable sites in accordance with PPS3. However, the surplus margin is small and insufficient sites are identified to meet the requirement until the end of the plan period in 2026. Nor does the housing land supply take account of the implications of any further increase in the annual requirement that may result from the forthcoming partial review of the RSS. Or the findings of the Strategic Housing Market Assessment published in January 2008 [RD24], which indicates that a significantly higher proportion of family homes are required than have been built in the recent past. Also, that the assumptions about density, especially with regards to some City Centre sites, may have been over-estimated.

5.2.19 However, I have identified in section 5.1 of this report that substantially less land (280 hectares) should be reserved for employment use than is identified by the submitted Core Strategy. Some of this surplus land could be used for housing. In addition, as I discuss elsewhere in this report, there are sustainably located developed sites within the Green Belt and small greenfield sites at the edge of the urban area that could potentially be allocated for housing. Such allocations would not conflict with the regeneration focus of the Spatial Vision, they would add some flexibility in providing a choice of housing sites and they would ensure that overall there is sufficient land available to meet long-term housing needs up to 2026. I am not convinced by the evidence in some representations that a strategic review of the Sheffield Green Belt boundaries is necessary in order to make satisfactory provision for housing during the period of this Core Strategy.

5.2.20 I acknowledge that it is fortunate that there is a generous supply of windfall sites that are likely to continue to come forward in the future. They will add flexibility to the overall housing supply. However, because there is not a significant surplus of housing land that may be allocated, none of the sites identified in the SHLAA should be discounted, at this stage, on policy grounds. This would pre-empt the City Sites DPD allocation process. Such sites include for example: (S00821, Oxclose Farm) that the Council considers should be developed for business or industrial use, although the SHLAA recognises that the site would, in principle, also be suitable for housing and could potentially accommodate around 250 dwellings. From the evidence, I also consider that it is equally suitable as a

housing site. The SHLAA also highlights two other sites included in the supply (S00797 Loxley College and S00802 Norton Aerodrome), which are developed sites in the Green Belt that I refer to above. The SHLAA has concluded that there is a reasonable prospect of these sites being developable before 2016. In total, they have potential to accommodate around 400 dwellings.

- 5.2.21 I conclude that the SHLAA retrospectively demonstrates that the Core Strategy can make adequate provision for housing land supply. However to make Policy SH1 sound having particular regard to tests iv, vii and ix I recommend that in addition to (IC75) concerning changes to the wording of the Policy text, the supporting text of the Policy including Table 8 and the Housing Trajectory should be deleted and replaced in accordance with **(IC76)**.

Distribution of Housing Land

- 5.2.22 Policy SH2 identifies the scale and locations for medium and larger scale new housing and it identifies the Transition Areas where long-term growth will be accommodated. I consider that the areas identified are appropriate in that they reflect two key themes of the Spatial Vision; transformation and sustainability and also the Spatial Strategy that aims to concentrate new development in the main urban areas of Sheffield, complemented by Chapeltown/High Green and Stocksbridge/Deepcar, on previously developed land, rather than spreading out into the surrounding countryside. This accords also with the settlement strategy of the RSS contained in its policies YH4, YH5, YH6 and YH7, which supports the Housing Market Renewal Areas, and informs that the Regional Cities (including Sheffield) should be the prime focus for housing, that the principal towns should be the main focus for local housing and that local service centres should meet locally generated housing needs.
- 5.2.23 However, I consider that Policy SH2 is too prescriptive in both the numbers of new dwellings that it prescribes and in the level of description of the listed locations, and thus it would pre-empt the choice of sites to be considered in the examination of the future City Sites DPD. Furthermore, by the Council's own inference, by suggesting substantial changes to these numbers prior to the September hearing session, the details of the submitted Policy SH2 are not the most appropriate and are based on out-of-date information. Therefore, it is unsound.
- 5.2.24 The changed numbers suggested by the Council reflect the findings of the SHLAA. Whilst I do not question the robustness of that evidence, my concerns about the overly prescriptive nature of the Policy remain. In response to these reservations, the Council has suggested further changes to Policy SH2, which were discussed at a subsequent hearing session.
- 5.2.25 These latter changes would remove references to specific areas and numbers of dwellings to be provided, but would retain sufficient strategic context for making specific allocations in the City Sites DPD. The regeneration and sustainability priorities of the Spatial Vision would also be clarified. I generally support these further suggested changes to Policy SH2, which I consider are necessary to make the Policy, and hence the Core Strategy, sound. However, I recommend that yet further changes are necessary in order for the Policy to meet all of the soundness tests, and in particular, test ix, since it is crucial to the delivery of the housing supply that all appropriate and sustainable housing sites are considered as part of the site allocations process. All of the changes necessary to Policy SH2 to make the Core Strategy sound are consolidated in **(IC77)**.

- 5.2.26 Policy SH3 also directs the location of new housing development by requiring that at least 90% of all dwellings granted planning permission in any 5-year period will take place on previously developed land (pdl). It also lists exceptions where the remaining 10% of development may take place on greenfield sites. The intention of the Policy is to reinforce the regeneration focus of the Spatial Strategy.
- 5.2.27 The pdl target set by policy H2 of the RSS is only 65%, although the policy expects authorities to set their own targets and that the targets of the urban authorities will be higher than those in rural areas. The Council's justification for a significantly higher target is based on Table 13.2 of the draft RSS [RD01], which included the 90% target for Sheffield but was not carried forward in the published RSS, and the findings of the SHLAA at Tables 8 and 14, which indicate the following pdl levels of development; 2002/2013 = 93.27%, 2014/2016 = 94.47% and after 2021 = 100%.
- 5.2.28 However, Table 14 of the SHLAA also shows that the pdl level for the period, 2017/ 2021 = 88.4%. This indicates a potential difficulty in meeting the 90% pdl target during that period. Furthermore, given my concerns regarding the 'tightness' of the housing supply and the need for flexibility to aid delivery of housing numbers and mix, especially during the current downturn in the house building industry, I am not convinced that the target of 90% is the most appropriate. Various alternative targets were discussed at the hearing sessions, with around 80% being the most popular set out in representations. However, given the emphasis of the Core Strategy on regeneration, I consider that to set the target that low would send conflicting messages, cause internal inconsistency within the DPD and provide insufficient strategic steer for the site allocation process. Taking these factors into account, I conclude that an 88% pdl target would be the most appropriate, and I recommend that the Policy is amended accordingly to make it sound.
- 5.2.29 The second part of the Policy, which identifies where greenfield development may take place, does not strictly accord with the sequence of RSS policy YH7 and it precludes urban extensions other than at Owlthorpe. Whilst I do not consider that the completion of the Owlthorpe township would be inappropriate, I am aware of similarly sustainable greenfield sites on the edge of the urban areas that could also potentially be developed for housing without jeopardising the Spatial Strategy. They could add greater choice to the site allocation process and I see no reason why they should be excluded in preference to Owlthorpe at this stage. I conclude that Policy SH3 is unsound for these reasons. Furthermore, I see no reason why sustainable urban greenfield sites should be required to meet the 'exceptional' test of criterion c. since this would limit flexibility. Urban greenfield sites that are important for green infrastructure would be protected by other Policies of the Core Strategy. This 'exceptional' requirement should therefore be deleted from the Policy.
- 5.2.30 In response to these issues that were discussed at the hearing sessions, the Council has suggested changes that are listed in [ED25]. I have consolidated these and added changes of my own to aid flexibility and implementation of the Policy in **(IC78)**, which is necessary to make Policy SH3 sound.

Release of Housing Land

- 5.2.31 The strategy for the release of housing land is contained within Policies SH1 and SH4. Policy SH1 gives the time periods for the two phases and identifies the priority locations for housing development as being in the HMR Pathfinder area, other housing renewal areas and in the City Centre, as part of mixed-use

development. The Phase 1 period of 2008 to 2016 approximates to the Housing Market Renewal (HMR) programme and in my opinion is necessary to promote housing regeneration and delivery in the HMR areas, and it is consistent with the RSS. Concerns have been raised that taking account of the slow performance of the HMR programme to date, the phasing and its link with the identified priority areas could frustrate the release of others sites outside those areas and jeopardise housing delivery generally. But as the HMR programme was only established in 2003, it is only just moving into its delivery phase and there is in place £250 million investment for the programme, I share the Council's expectation that its level of housing delivery will significantly improve in the near future.

5.2.32 Phase 2 relates to the remainder of the Core Strategy period, but the Policy sets out the circumstances under which sites outside the priority locations may be developed during Phase 1, thereby giving flexibility to the implementation of the Policy. However, for internal consistency of the Core Strategy and conformity with the RSS, I recommend that its end date is extended to 2026. I have recommended at paragraph 5.2.9 above that to avoid muddle within Policy SH1 its phasing element should be removed. For clarity I recommend that it should be re-located in Policy SH4. In order that proper account is taken of flood risk implications in the release of land for housing the Policy should also be amended to reflect the sequential tests of PPS25 and for consistency with Policy SH1 references to meeting the 'gross' housing requirement should be changed to 'net'. All of these changes are consolidated in **(IC79)** and are necessary to make Policy SH4 sound.

5.2.33 **My overall conclusion is that the Core Strategy is unsound having regard to its Policies for the supply, distribution and release of land for housing, primarily because they are in part inconsistent with PPS3, they are not based on robust, up-to-date evidence and they are not sufficiently flexible. However, the retrospective publication of a SHLAA for Sheffield partly addresses these issues and the policies can be made sound provided that they are amended in accordance with my recommended changes; (IC75, IC76, IC77, IC78 and IC79), which are set out in full in Annex A of this report.**

Affordable Housing and provision for other special groups

5.2.34 Policy SH6 - Affordable Housing, as submitted, contains no details of an overall target sought for the provision of affordable housing in the area, or separate targets for social-rented and intermediate affordable housing or for the size and types of affordable housing likely to be required. It was the intention of the submission Policy to leave such detail to lower level DPDs, namely the City Policies DPD and also SPD. However, the Policy justification states at paragraph 8.20 that a 40% target "would not be achievable through the means available". Policy H4 of the RSS sets provisional estimates of a target for Sheffield of 30-40%.

5.2.35 However, in light of concerns which I expressed at the Exploratory Meeting that the Policy was leaving too much detail and the 'difficult decisions' to a lower tier DPD, the Council has suggested amendments to the Policy. The amplified Policy SH6, which would bring forward detail from intended policies in the City Policies DPD and has been the subject of further public consultation, proposes a target of 40% affordable housing on sites with a capacity for 15 units or more. On sites

below this threshold a sliding scale would be used to ensure that contributions are appropriate to the scale of the site and identified need.

- 5.2.36 Sheffield's Strategic Housing Market Assessment (SHMA) [BD23] was published towards the end of 2007, after the submission of the Core Strategy, but before consultation on the amplified Policy SH6. Prior to completion of the SHMA, the 2004 Housing Needs Study [BD24] was used as the evidence base for affordable housing need and to inform the development of Policy SH6. I am satisfied that it was robust in relation to guidance current at the time of the Study. The New Policies Background Report [BD35] sets out the evidence for the revised Policy and provides further information from the 2007 SHMA in support of proposed changes to the Policy text.
- 5.2.37 Some representations question the validity of the SHMA and consequently whether it can be considered to be sufficiently robust to form the evidence base for the amplified Policy SH6. However I am satisfied, from the Council's written responses to these concerns and in the light of discussion at the hearing session, that despite the SHMA being produced at a time when guidance on how to complete such assessments was evolving, it is robust and credible.
- 5.2.38 It concludes that the level of need for affordable housing in Sheffield would justify a target proportion of 75%, although it is recognised that such a level of provision could not be realistically delivered. Paragraph 17.5.7 of the SHMA suggests, therefore, that a more realistic target would be 40%, which is incorporated in suggested amplified Policy SH6.
- 5.2.39 From the evidence, both written and oral, I conclude that there is a level of need for affordable housing in the Sheffield area that justifies a 40% target, although I accept that the SHMA does not clearly identify this need. However, the question that remains to be considered is whether or not a target of 40% is realistic in terms of achievability and deliverability. These two issues are crucial for Sheffield and must be considered in light of the fact that the current 20% target is failing to provide sufficient affordable housing; nor is it being achieved.
- 5.2.40 There is a further importance of ensuring that the 40% target is credible having regard to the Blyth Valley judgement following the challenge made to the High Court by a group led by Persimmon Homes (North East) Ltd. The conclusion of the High Court judgement was that the policy submitted by Blyth Valley was not founded on a robust and credible base owing to the lack of consideration of economic viability. There was no disagreement with the level of need presented by the Housing Need Study but that the local authority did not provide evidence "beyond merely the degree of need for such housing" (paragraph 43, CoA judgement). It was noted that there had been a failure to consider the requirement of PPS3 in that an assessment of economic viability should be used to inform the proposed target.
- 5.2.41 Therefore, in view of the above, it is necessary to ensure that the affordable housing target outlined in suggested amplified Policy SH6 is the most appropriate and ultimately is founded on robust and credible evidence. In response to my questions on this issue the Council has presented information in its Topic Paper Main Matter 6b, question 9i [ED40]. It indicates, from an in-house exercise, that a range of sites have been considered against a range of affordable housing targets. Of the 5 sites tested 3 retained a positive Residual Land Value (RLV) at a 40% affordable housing provision and, of those, 2 were able to achieve a land value that is considered acceptable; the term 'acceptable' being defined by the Council as being where land value is above 12% of Gross Development value (GDV). It is

suggested by the Council that this is sufficient justification for an affordable housing target of 40%, but should 40% prove unviable then sites will be assessed on an individual basis.

- 5.2.42 As the Blyth Valley judgement is very recent, there is limited information available to indicate what is considered to constitute the robust and credible evidence base required by soundness test vii. However, I conclude that the evidence base underpinning the suggested amplified Policy SH6 is insufficient to meet the requirements of paragraph 29 of PPS3, or to pass soundness test vii, because I do not consider that the level of viability testing, i.e. five case studies, with no transparency of calculations and limited understanding of site characteristics (retained due to commercial sensitivities), carried out by the Council is robust. There is no evidence to indicate that the assumed low GDV value of 12% is commercially acceptable or viable, nor is there detailed information provided on the impact of any public subsidies that may be available. Furthermore, I do not consider that the findings themselves are credible, with less than half of the sites tested achieving an acceptable land value as percentage of GDV. As I report at paragraph 5.2.34 above, the inappropriateness of a 40% is target is referred to in the supporting text of the submitted Policy SH6. I conclude that the suggested amplified Policy SH6 fails to meet soundness tests iv and vii.
- 5.2.43 Subsequent to the first of the September hearing sessions at which affordable housing was discussed, the Council suggested a further revision to Policy SH6, which would simplify its implementation. Its introductory text identifies a need for 729 net affordable homes per year, in addition to around 350 to be provided through the National Affordable Housing Programme. However, reference is still made in the further revised Policy to; "On sites with a capacity for 15 or more units, up to 40% of units will be sought as affordable housing". For the reasons given above I conclude that there is no sound justification for this percentage, which for implementation purposes will inevitably be regarded as a target. Thus this version of the Policy is also unsound.
- 5.2.44 However, these conclusions raise a further issue, namely that the suggested amended versions of Policy SH6 have emerged in light of indications that the submitted Policy could be assessed as being unsound due to the level of detail being delegated to lower tier DPDs. Although PPS3 does not specifically state that the affordable housing target should be in a Core Strategy, there is a general assumption that it should be, given the importance of the issue. This, therefore, begs the question of from where the Council's affordable housing policy will originate.
- 5.2.45 A pragmatic alternative in these particular circumstances would be to re-introduce the necessary detail to the City Policies DPD, after a robust and credible assessment has been carried out to establish the most appropriate target for affordable housing provision, and to rely in the meantime on the wider Development Plan, PPS3 for the threshold (national indicative minimum of 15 dwellings) and the RSS 30-40% indicative target, although it is accepted that the upper end of this target is troublesome in light of the viability concerns highlighted above.
- 5.2.46 On this basis I accept that the submitted Policy SH6 meets the soundness tests provided that it is updated regarding the position of the now published RSS and the SHMA, and that reference to the deliverability of a 40% target is deleted from the supporting text, as I recommend in **(IC80)**.

- 5.2.47 As part of its re-assessment of the intended policy provision for affordable housing the Council also suggests that Policy SRS1; Affordable Housing in the Larger Rural Settlements should be deleted. In my opinion that Policy does not add to national policy guidance contained in PPS3 and I recommend that the entire Policy and its supporting text be deleted, as set out in (**PC248**), in order to meet soundness tests iv and vii.
- 5.2.48 Turning now to housing provision for other special groups, Policy SH8 informs that a need has been identified for additional locations for accommodating gypsies and travellers and it sets out a strategic policy statement of how these will be provided. It derives from robust evidence contained in the South Yorkshire Gypsy and Traveller Accommodation Needs Assessment [BD30], which was carried out jointly by all four local authorities in the sub-region, in accordance with good practice guidance, and was published in 2007. However, like several other policies of the Core Strategy, the Policy intends to delegate implementation detail to the subservient City Sites DPD, thereby making it unsound having regard to guidance in PPS12. The inappropriateness of the intended approach was another matter that I raised at the Exploratory Meeting.
- 5.2.49 In response, the Council has suggested a revised, amplified Policy that brings forward detail that was intended to be contained in the City Polices DPD. The suggested amplified Policy, which gives clearer guidance on accommodation priorities and criteria for the location of new sites, would provide greater certainty about delivery of new accommodation and the initial focus on improving existing stock, which is a key finding of the Assessment. Its additional detail, which has been the subject of subsequent public consultation and discussion, would preclude the necessity for further policies elsewhere in the SLDF.
- 5.2.50 I consider that the target for 29 new additional pitches set for suggested amplified Policy SH8 is appropriate as it is based on the assessed level of need for new pitches identified in [BD30] at table 3.1. The total extra pitch requirement is split into immediate need and household formation, over the period to 2011. I agree with the Council that it is appropriate to set the target over a longer period than this, due to the timescales involved in site allocation, high vacancy rates on existing sites, the limited funding available for new site development and the development of sub-regional priorities. This approach is also supported by the Assessment, which states that although the research suggests that there may be potential demand for additional residential provision (to accommodate overcrowded households for example), it is recommend that this is considered in three to five years time, after the priority needs have been met.
- 5.2.51 ODPM circular 01/06 indicates at paragraph 65 that while there will be a "preference for sites to be in or near existing settlements...this is not to be regarded as a requirement in all cases". Thus whilst it could be interpreted that the suggested amplified policy is too onerous with regards to its suggested locational criteria, I consider that they are justified by their prefacing of sites being, "subject to the same requirements as for other development in those areas", which emphasises that the Core Strategy aims to mainstream the provision of Gypsy and Traveller and Travelling Showpeople sites. I am satisfied that the suggested revised Policy would meet all of the soundness tests.
- 5.2.52 I conclude that the changes to Policy SH8 set out in principle in PC29 and in full in (**IC81**) are necessary to make the Core Strategy sound.
- 5.2.53 **I conclude that the Core Strategy is unsound having regard to its Policies for provision for affordable housing and for other special groups,**

primarily because they are in part inconsistent with PPS3 and PPS12. However, it can be made sound provided that Policies SH6 and SH8 are changed and Policy SRS1 deleted as recommended in; (IC80, IC81 and PC248), which are set out in full in Annex A of this report.

Housing density, accessibility and mix

- 5.2.54 Housing density and accessibility are the subjects of Policy SH5. The Policy was originally intended to indicate the strategic principles for establishing densities in different types of location and was to be used in conjunction with the City Policies DPD [CD14] for the specific figures. However, the Council is now suggesting changes to the Policy that would include specific density ranges to be read alongside these locations and to remove the sister policy from the City Policies DPD, as indicated in (PC26). The suggested densities range from at least 70 dwellings per hectare in or near the City Centre to 30-40 dwellings in the rural areas.
- 5.2.55 I consider that it is important that the density ranges are made explicit in the Core Strategy because, amongst other things, assumptions about housing land requirements made in the SHLAA are based upon them. The suggested change is therefore necessary in order to provide a spatial and strategic context for the City Sites allocations.
- 5.2.56 Policy SH5 adds to paragraphs 46 and 47 of PPS3 by developing a density policy which has regard to the Spatial Vision for Sheffield of renewing the urban area rather than expanding levels of accessibility, and the characteristics of different areas. It also indicates the general orders of density relevant to specific types of location in Sheffield, in support of Objectives S9.2 and S12.1 of the Core Strategy.
- 5.2.57 The density ranges set out in Policy SH5 are consistent with PPS3 guidance in that they reflect typical capacity of services and infrastructure, as well as accessibility in different types of area, with a hierarchy leading down from the highly accessible and well serviced City Centre, to less accessible and low serviced rural areas. The density ranges given will enable development that is generally respectful of the character of areas, with lower densities appropriate in less accessible sub-urban areas. This relates to the requirement in PPS3 for density policies to have regard to the characteristics of the area. In my opinion they are the most appropriate and meet soundness test vii.
- 5.2.58 The suggested density range for the City Centre appropriately starts with a lower density of 70 dwellings (as opposed to a typically higher City Centre residential density elsewhere) and will enable developers to bring forward schemes including larger flats, which were highlighted in the Sheffield City Centre Residential Market Assessment [BD21, paragraph 8.9] as being important for attracting a wider range of households to live and buy in the City Centre. This will be important for the long-term sustainability of the City Centre as a residential location. The relatively lower density will also allow flexibility for development of lower height buildings in appropriate locations in the City Centre. It also allows for residential densities to be achieved on mixed developments, where the quantum of residential use may not be as high as on solely residential schemes. The District Centres have good accessibility to public transport, which justifies the density requirement there for 50-80 dwellings. To a slightly lesser extent, sites which are near to high-frequency public transport routes, but not near to a District Centre, have good levels of accessibility and therefore their range of 40-60 dwellings is appropriate.

- 5.2.59 In the remaining parts of the urban area, which are largely sub-urban in character and include the South-Western area, typically containing either larger dwellings or smaller dwellings set in a more spacious street form, the suggested density range is 30-50 dwellings per hectare. These areas are not highly accessible by public transport or within convenient walking distance of District Centres with associated shops, services and job opportunities. It would therefore be inappropriate for new residential development to encourage higher density populations to live in these areas, where access is more likely to be by car.
- 5.2.60 Furthermore, sub-urban areas with a lower density requirement provide the key opportunity for development of lower density, larger housing that will be more suitable for families and larger households, and 'executive' homes, which are more likely to be developed in high numbers in the suburbs than other areas. This is important in ensuring that new development city-wide contributes to meeting the needs of a broad range of households as identified in the SHMA. The lower density acceptable in such areas has been set at 30 dwellings per hectare, which is the national indicative minimum, in order to allow flexibility for developers to create very low density housing, should it be appropriate in a particularly sensitive context. By allowing the density range to reach up to 50 dwellings per hectare, the widest variety of house size mix is possible, from 100% large detached houses to 70% houses and 30% flats, which could include a mix of town houses, and semi-detached. I conclude that the suggested density ranges are based on robust evidence, are the most appropriate and are sufficiently flexible.
- 5.2.61 To add further clarity to the Policy it is also suggested by the Council that the term, "near to" is defined as being within 400 metres of a high frequency bus route or within 800 metres of a Supertram stop, taking into account barriers such as railways or rivers. "A sensitive area" is defined as an area that is sensitive for reasons of architecture, heritage, landscape or ecology. I am satisfied that these definitions are the most appropriate and are necessary to make the Core Strategy sound. All of these necessary changes to Policy SH5 are incorporated in **(IC82)**.
- 5.2.62 Policy SH7 refers to housing mix. In addition to providing for a range of sizes and types of dwellings, the Policy provides guidance on the preferred locations for student accommodation and seeks to avoid concentrations of hostels, purpose-built student accommodation and houses in multiple occupation. The Policy is informed by evidence from the draft 2007 SHMA (June 2007) prior to its final publication in December 2007 [BD23], which indicates that 70% of future residential demand is for houses. In addition to this, evidence was used from the 2001 census, and the City Centre Residential Market Assessment [BD21]. I am satisfied that these comprise a robust evidence base for the Policy.
- 5.2.63 In response to my concerns raised at the Exploratory Meeting that the Policy thresholds necessary for its implementation were intended to be delegated to the City Policies DPD the Council has suggested changes to the Policy, which have been the subject of full public consultation.
- 5.2.64 The suggested changes would clarify in criterion a. that in the City Centre larger developments should not consist of a single house type. Criterion b. of the submitted Policy requires a greater mix of housing in other locations including homes for larger households, which could include an element of 'executive' homes. The locations for student accommodation given in criterion c. of the submitted Policy are quite specific. It is subsequently suggested by the Council that these should be substituted with more generalised locations; to the areas directly to the north-west and south of the City Centre. I consider that this change

is necessary to make the Policy sufficiently flexible. The Council also suggests that rather than 'limiting' the types of shared housing to avoid concentrations referred to in criterion d., such forms of accommodation should be 'prohibited', but this would introduce inflexibility into the Policy that I conclude to be unnecessary and inappropriate.

- 5.2.65 Other changes suggested by the Council are the inclusion, in the supporting text, of definitions of, 'a single house type', 'larger developments', 'shared housing' and 'concentrations' of shared housing. Except for the last I consider that the definitions are the most appropriate.
- 5.2.66 In order to promote the objective of the Policy to create mixed communities it is necessary to avoid domination of areas by shared housing, just as it necessary to prevent concentrations of other types of housing. The Council suggests that a 'concentration' of shared housing, including student accommodation should be defined as, 'an area where 20% of residences within 200 metres', later reduced to 100 metres, 'of the application site are shared housing'. The evidence used to set these thresholds is described in the New Policies Background Report [BD35] at paragraphs 4.30 – 4.34. It is based on analysis of recent situations in which action in relation to applications for new Houses in Multiple Occupation (HMOs) would have been required to deal with known concentrations of shared housing, and consideration of a range of community perspectives expressed through consultation and through an Area Panel meeting.
- 5.2.67 I acknowledge that the community groups in areas with high percentages of shared housing support the 100 metres threshold, but in my opinion this is too discriminatory against the provision for student accommodation and could detract from the attractiveness of the city's two universities for potential students. However, I conclude that the 200 metres threshold is justified and that it is the most appropriate means of achieving the objective of the Policy. The use of the word 'limiting' in the Policy text would ensure flexibility in its application.
- 5.2.68 I conclude that Policy SH7, as submitted, is unsound because it fails to meet test viii, but it can be made sound provided that all of the changes that I have recommended above and which are incorporated in (IC83) are made to it.
- 5.2.69 **My overall conclusion is that the Core Strategy is unsound with reference to its policies for provision for housing density, accessibility and mix, primarily because they fail to include measurable thresholds against which decisions on planning applications may be made and achievement of the Policies' objectives measured. However, it can be made sound provided that Policies SH5 and SH7 are changed as recommended in (IC82) and (IC83), which are set out in full in Annex A of this report.**

5.3 PROVISION FOR OPEN SPACE

Main Matter - Whether the policies and proposals of the Core Strategy for open space are consistent with national and regional policy, the most appropriate and based on a robust evidence base.

- 5.3.1 Policies SOS1 and SOS2 of the submitted Core Strategy respectively refer to the city-wide qualitative and quantitative deficiencies in open space provision. The strategic priorities of SOS1 are to improve and safeguard the quality and accessibility of existing open space. Policy SOS2 seeks to create new open space, especially where there is an identified quantitative shortage and where it is required to extend the City's Green Network. This approach reflects the reality

that in urban areas the opportunities to create new space are often limited. I consider that it is appropriate for the policies of the Core Strategy to stress the importance of improving the quality and accessibility of existing areas of open space, since this is often the most effective way of improving the opportunity for recreation in a given area. This is acknowledged in paragraph 3 of PPG17 and is consistent with the approach advocated in its Companion Guide, particularly with regard to the Guiding Principles that are set out in its Chapter 2. I am satisfied that the pragmatic approach of the Core Strategy towards open space provision is the most appropriate.

- 5.3.2 However, the categories of open space that may be included in the Policies are not defined, which makes them ambiguous and, therefore, unsound in terms of test viii. The Council proposes to address this by the addition of a schedule of open space typologies forming part of its suggested new Policy SOS3 – Safeguarding Open Space (PC30), which I discuss below. This schedule largely repeats the typologies contained in the Annex to PPG17, but it aids interpretation of the submitted Policies in the Sheffield context by categorising them into 'Formal' and 'Informal Open Space' and by providing target amounts of both main types.
- 5.3.3 Policy SOS1 refers to a 1,200 metres accessibility threshold, the evidence to support which is contained in the Council's Site Categorisation Strategy (2000) [PD39] based on the principle of a 15-minute walk, which is consistent with the available evidence on the distance that people are prepared to travel and has worked well in practise. Thus although the Site Categorisation Strategy (2000) pre-dates PPG17 I am satisfied that Policy SOS1 is based upon robust evidence, as required by test vii.
- 5.3.4 I do not consider that it would be appropriate to refine this accessibility threshold to make reference to either the ANGSt standard or to a woodland access standard because desirable as these standards are to the accessibility of the specific types of natural greenspace to which they refer, in this urban area the opportunities for achieving them would be aspirational rather than feasible. Nevertheless, the Core Strategy encourages access to natural greenspace through the Green Network, strategic links for which are set out in Policy SE2.
- 5.3.5 The supporting text to Policy SOS2 (a) defines a quantitative shortage as being 4.0 hectares (ha) or less per 1,000 people and is based on PPG17 compliant audits. The evidence to support this minimum provision is demonstrated in the Open Space Technical Note [BD31] and includes audit data, such as that in the Playing Pitch Strategy (2005) [PD40], together with detailed GIS mapping. I consider that the evidence base for Policy SOS2 is robust and I am satisfied that the 4.0 hectares minimum standard, which although one third less than the Sheffield UDP 6.0 hectares/1000 people standard, is justified. Also that it is the most appropriate in setting a realistic baseline of acceptable provision to identify neighbourhoods in the city with unacceptable levels of provision where proactive intervention should be taken to create new open space. Evaluation of 'quantitative shortage' would be further aided by the inclusion of thresholds of 1.3 hectares of formal open space and 2.7 hectares of informal open space in the reasoned justification of the Council's suggested new Policy SOS3, which are based on the PPG17 compliant audits referred to above.
- 5.3.6 The supporting text to Policy SOS2 identifies the broad locations where quantitative shortages occur. I consider that it is appropriate that they have not been identified in finer detail because that would go beyond the strategic purpose

of the Core Strategy. Similarly, I consider that it is appropriate to delegate details of quantitative thresholds for the fine elements of the open space typologies to an SPD that the Council proposes to produce and which is referred to in the LDS, taking account of the complete audit data and the strategic direction of the Green and Open Space Strategy [PD09]. This approach also provides the flexibility necessary in the Policy to allow standards and thresholds to be amended easily, if necessary, subject to future audits during the lifetime of the Core Strategy. I conclude that Policy SOS2 meets soundness tests iv, vii and ix.

- 5.3.7 However, as stated in paragraph 10.1 of the Core Strategy, safeguarding existing open space, including areas of ecological importance and heritage value, will continue to be very important in the mainly urban Sheffield area. Consequently, I consider that it is a gap in the coverage of the Core strategy to not include a policy that sets out strategic guidelines for the safeguarding of existing space that is of public value. I consider it to be inappropriate to relegate this matter to a subservient DPD. I conclude that the Core Strategy is unsound in this regard.
- 5.3.8 To address this omission the Council proposes new Policy SOS3 (PC30), which during the suspension of the Examination was fully consulted upon and appraised against the Council's sustainability objectives. This suggested new Policy combines and brings forward policies already considered and consulted upon in the Preferred Options City Policies DPD. The origins of this Policy are reflected in its management style wording, but in my opinion this does not make the Policy unsound and avoids the necessity for complementary policies in the forthcoming City Policies DPD.
- 5.3.9 In response to representations made to the suggested Policy SOS3 and comments made at the hearing session at which it was discussed, further amendments to minor matters of detail are suggested by the Council. These include; the addition of criteria to safeguard sites of particular intrinsic quality, in terms of their landscape, heritage or ecological value and to safeguard open space where it could be used to fulfil an unmet local need, deletion of the option of replacing open space in a different area of the City and omission of the requirement for compensatory improvements if a particular area of open space can be clearly shown to be surplus to local needs. A restructuring of the Policy to reflect its precautionary approach and to reflect how the Policy will be implemented, emphasising that the primary aim is to safeguard open space and that development will only be considered in exceptional cases is also suggested by the Council.
- 5.3.10 I consider that all of these amendments are necessary to make the Policy sound and I have encompassed them all in **(PC30A)**, which sets out new Policy SOS3 and its supporting text in their entirety. To avoid overlap, I recommend that the reference to safeguarding existing open space is deleted from the first line of Policy SOS2, in accordance with **(IC38)**. In addition, the reference in paragraph 10.1 of the Core Strategy to, "a series of control policies in the City Policies document," should be deleted as they are unlikely to be necessary as their intended detail has been brought into the Core Strategy, within recommended new Policy SOS3. This change, which is necessary for coherence is set out in Annex A as **(IC84)**.
- 5.3.11 **I conclude that the policies and proposals of the Core Strategy for Open Space are unsound, but they can be made sound provided that changes: (PC30A, IC38 and IC84) are made, full details of which are given in Annex A of this report.**

5.4 SUSTAINABLE TRANSPORT MEASURES

Main Matter - Whether the policies of the Core Strategy for moving people and goods by efficient and sustainable forms of transport are consistent with national and regional policy, the most appropriate, based on a robust evidence base and are deliverable.

- 5.4.1 Provision for sustainable transport is referred to in several of the Challenges and Objectives of the Core Strategy, which aim to manage the tensions between the need for mobility and choice of modes of transport on the one hand, and minimising congestion and promoting good health on the other. In particular, Challenges 7 to 15 of the Core Strategy set the context for the issues that its transport policies seek to address; namely those of promoting sustainable transport and minimising energy use and carbon emissions.
- 5.4.2 Policy ST1 lists the transport priorities and sets out the strategic framework, which guides the other 9 transport policies of the Core Strategy. I consider that this transport strategy is generally consistent with PPG13, the RSS, the Government's 10-year Transport Plan and the South Yorkshire Local Transport Plan (LTP2) [RD06]. Together with the settlement pattern of the Spatial Strategy, it will promote the shift away from car use that is necessary in order to achieve the Government's wider sustainability objectives given in PPS1 and the Climate Change Supplement to PPS1, and those of the Core Strategy. Paragraph 13.2 of the supporting text to the Policy refers to maximising accessibility to places by all users, including disabled people. However, to add clarity as to what these requirements are and to generally accord with the regional transport strategy contained in the RSS, suggested change (**PC93**) would add a sentence that refers to the accessibility criteria of Policy T3 of the RSS. I consider that this change is necessary to make the Core Strategy sound having regard to soundness tests iv and vii.
- 5.4.3 The Core Strategy's transport Target 2 is for 38.5% of all journeys into the City Centre to be made by non-car modes and is intended to ensure that this modal shift away from car use will be a continued priority throughout the Core Strategy period. This Target is challenging, but from the broad range of delivery mechanisms set out in the transport policies I do not consider that it is unrealistic. Following from Policy ST1a, which promotes choice by developing alternatives to the car, Policy ST3 - Management of Demand for Travel, Policy ST6 - Priority Routes for Bus and Bus Rapid Transit and Policy ST8 - Park-and-Ride and Car Parking in the City Centre seek to enable this modal shift through a combination of push and pull measures. The restrictive nature of Policies ST3 and ST8 aim to manage and limit the opportunity for car use at the point of destination, whilst high quality journey alternatives are set out in Policy ST6, which identifies priority routes for bus and bus rapid transit, supported by Policy ST4 and Policy ST5, which respectively refer to pedestrian and cycle routes. Policy ST8, which makes increased provision for permanent short-stay parking spaces in the City Centre to support its economic transformation, but reduces long-stay provision, is intended to further increase the move towards the required transport modal shift by commuters. This approach is also recognised and supported by Policy SCC9, which states that the anticipated increase in City Centre trips will be managed by measures including park-and-ride and car sharing.
- 5.4.4 The policies and guiding principles set out in the transport policies of the Core Strategy are applicable over the whole plan period. LTP2 provides the delivery mechanism and monitoring regimes that will guide the implementation of the Core

Strategy transport policies through their early years, particularly in terms of policies such as ST6. Thus from a delivery perspective, whilst the shorter timescales of the LTP2 and the Government's 10-year Transport Plan are reflected in the policy targets and indicators, I am satisfied that their priorities and strategic imperatives will remain relevant in the longer term. I consider that the necessary balance between deliverability and longer-term challenging aspirations is struck correctly. I conclude that the transport policies of the Core Strategy will provide an important basis for future bidding for transportation improvements and will form the most appropriate framework for future local transport policy development.

- 5.4.5 Turning now to more detailed consideration of the individual transport policies, the listing of transport priorities in Policy ST1 implies an intended order of importance. However, as discussed at the hearing session, they are equally essential for achieving efficient and sustainable transportation, and in most cases are dependent upon one another for success. To make the Policy sound this should be clarified by the addition of the words, 'complementary priorities of the' before the word 'policy' in paragraph 13.3 of the Core Strategy, as set out in **(IC34)**.
- 5.4.6 The Table associated with Policy ST2 sets out the extent and future role of the Key Route Network in Sheffield. I am satisfied that its provisions are generally appropriate and based on robust evidence. The A57 City Centre-Manchester Road is identified in this Table as forming part of the Key Route Network and is highlighted as a strategic freight route. However, this is inconsistent with the aims of Policies ST3, ST4 and ST5, which respectively identify this route as being important for walking and cycling. At the hearing session it was discussed that the nature of this part of the A57 is changing and becoming less important for freight movement. In recognition of this and to rectify the Policy inconsistency referred to above, the Table should be changed in accordance with **(PC257)** by removing the 'tick' that shows the A57 to be an important strategic freight route.
- 5.4.7 Objective 5 of the Regional Economic Strategy for Yorkshire and the Humber (2006 – 2015) (RES) [RD03] informs that priorities for rail connections should focus upon the links to London, Manchester and Leeds, but it does not specifically state that other links should not be prioritised if of significant importance. I consider that Policy ST7 is generally consistent with this, because whilst it prioritises inter-regional links, it also takes account of local conditions, in particular the need to improve sub-regional connections to the main urban centres. The importance of these connections is recognised in the South Yorkshire Spatial Vision [RD07], which cites better connections between the four main urban areas as a key aim and by the Sheffield City Region Development Plan [RD12] that recognises the need to prioritise inter-regional rail links to London, Manchester and Leeds, but also highlights the importance of building upon local connectivity (both road and rail) to support the wider northern economy. However, in order to make the nature of the sub-regional links referred to in Policy ST7 explicit, its first sentence should be changed as set out in **(PC94)**.
- 5.4.8 The first part of Policy ST8, which indicates that short-stay parking provision in the City Centre will be increased to 9,500 spaces has been criticised for lending support to private car use, contrary to sustainable transport objectives. However, evidence updated in connection with part of the development of the New Retail Quarter proposals demonstrates a need for additional short-stay City Centre car parking in order to meet the demand that will be generated by the planned and commenced major regeneration projects. The existing supply of car parks is

dispersed, small in scale and of poor quality. This has led to inefficient movement patterns within the City Centre, poor accessibility and issues of safety and security. The delivery of new, replacement car parks and the accompanying rationalisation of car parking spaces is intended to deliver a better, more efficient car parking system in order to anchor the major retail development proposals. I consider that this is fundamental to the city's economic prosperity and to the development of its core city function of serving the City Region.

- 5.4.9 The second part of Policy ST8 informs that additional long-stay car parking to serve the City Centre will be provided through park-and-ride facilities outside the Centre and it lists the strategic priority corridors and general locations for them. These accord with the existing and proposed public transport corridors as set out in Policy ST2 and are consistent with the South Yorkshire Park-and-Ride Strategy. In addition, the Core Strategy Key Diagram indicates the locations of the existing and proposed park-and-ride sites. My concern with this is two-fold; firstly I do not consider that these facilities are so strategic and fundamental to the achievement of the Spatial Vision to warrant inclusion in the Key Diagram. Secondly, in some cases, for example the Penistone location, although not intended, it is actually so site specific as to preclude meaningful choices to be made at the subsequent City Sites DPD level. Consequently, the identification of these sites in the Key Diagram is inappropriate and should be removed to make the Core Strategy sound, as I recommend in **(IC35)**. Furthermore, the use of the incorrect tense in the last sentence of the Policy pre-empts future decisions upon the precise sites of the park-and-ride facilities and should be changed, as set out in **(IC36)**.
- 5.4.10 As described in paragraph 7.37 of the Transport Background Report [BD09], proposals to extend the Sheffield Supertram system to Meadowhead were submitted to the Department for Transport (DfT) as an Annex E submission in 2004. This proposal and the routes included were developed following an extensive scoping exercise that looked at a much wider range of initial route options. One of these options was to extend the tram from its current terminus at Herdings Park to serve further destinations on the south side of the City, but this option was discounted and did not form part of the final proposal. Ultimately, the DfT refused funding for any of the tram extensions and requested that alternative, more cost-effective solutions be sought. This decision by the DfT has eliminated any immediate prospect of delivery of an extension to the Supertram system. However, in the medium to long term the funding climate could change, thus in order not to preclude the long-term possibility of its extension, references to 'bus travel' and 'bus services' in Policy ST8 and in paragraphs 13.21 and 13.23 should be replaced by reference to 'best possible public transport', as detailed in **(IC37)**.
- 5.4.11 Policy ST10 informs that whilst there will be no significant increase in the physical capacity of the city's highways network, a limited number of road schemes are proposed. Most of these are included as proposals in the LTP2. However, the M1 Junction 34 relief road that is referred to as the 'Halfpenny Link' is not, and questions have been raised regarding its deliverability.
- 5.4.12 The link road is needed as part of a wider package of transport measures that are necessary to help achieve the land use and regeneration aspirations for the Lower Don Valley. The scheme is supported by Sheffield City Council, Rotherham Metropolitan Borough Council and major landowners in the Lower Don Valley. As such, there is a joint commitment to deliver the scheme. The Highways Agency also recognises that the Halfpenny Link is the only transport intervention capable of reducing the level of traffic that uses Junction 34 south of the M1.

- 5.4.13 The scheme was the subject of an unsuccessful bid to the DfT in 2002, because the Department considers that the new link, which would create the additional capacity necessary to enable development to take place, should be funded privately given its potential beneficiaries.
- 5.4.14 The Halfpenny Link forms part of the Bus Rapid Transit proposals, the first stage of which was given in-principle funding approval by the Regional Transport Board in September 2007 [BD09]. However, the emergence and development of this scheme was too late to feature in the LTP2 list of major schemes. At the time LTP2 was produced, the City Council and Rotherham Borough Council were still pursuing the Supertram extensions referred to above, as the DfT had yet to give a funding decision on that proposal.
- 5.4.15 In recognition of the previous unsuccessful funding bid, the funding of the Halfpenny Link, whether as a component part of the Bus Rapid Transit submission or as a transport intervention in its own right, would not be constructed using LTP funding. For these reasons it is not explicitly referred to in LTP2. However, the strategic objectives of the Halfpenny Link are entirely consistent with the document, in that it would reduce congestion on a problematic section of the network, improve public transport, and also contribute to the wider economic transformational vision of the Core Strategy.
- 5.4.16 To enable its delivery the Council is in discussion with Yorkshire Forward to advance fund the scheme, until such time that significant development proposals are forthcoming. In addition, a methodology is being established that will be used to harvest contributions from developments in the Lower Don Valley, including at Meadowhall (Policy SLD1) that would impact upon J34 south of the M1. This is a tariff-based approach that is being specifically geared towards generating the level of contribution needed to construct the Halfpenny Link. In line with the tests of Circular 05/2005 Planning Obligations, a developer's contribution would be proportional to the share of the capacity created that a new development's traffic would take up. I am satisfied that even in the absence of public funding delivery of the Halfpenny Link is realistic.
- 5.4.17 I consider that the other transport policies of the Core Strategy; Policies ST3, ST4, ST5, ST6 and ST9 meet soundness tests iv, vii, viii and ix.
- 5.4.18 As cross referenced in paragraph 5.4.16 above, Policy SLD1 also requires a wide range of specified, complementary transport measures associated with development at Meadowhall, which are necessary in order to allow the scale and density of expected development in the Lower Don Valley. Paragraph 16.12 of the supporting text implies that they will be delivered through a range of mechanisms including developer contributions. However, to make this explicit and the Policy sound, and Circ 05/2005 compliant, appropriate references should be added to Policy SLD1 and the supporting text as set out in **(PC109)** and **(PC111)** respectively.
- 5.4.19 Transport measures are also required to facilitate development in the Upper Don Valley. In particular, Policy SUD1 informs that industrial and business uses will be promoted with significant access improvements including bridging the River Don from Middlewood Road. The bridge link is not required only on transport grounds, but forms an important part of the long-term strategy for integrating land use and transport in the north-west part of the city. As well as significantly improving accessibility to key regeneration sites this link would help to increase capacity between Stocksbridge and the main urban area. Paragraph 17.7 of the Core

Strategy indicates that the bridge is the subject of a bid in the LTP and that developer contributions will also contribute towards its funding.

- 5.4.20 However, the transport scheme currently being developed as an outline Major Scheme Business Case for the A61 corridor does not include the proposed bridge link from Middlewood Road. Furthermore, representations on the Core Strategy indicate that land owners may have other, residential development/part residential aspirations for land at the Claywheels/Beeley Wood Lane area that would conflict with the use of this land intended by Policy SUD1. Thus its anticipated industrial/business development from which necessary contributions could be harvested may not be forthcoming. The delivery of the bridge proposal is therefore questionable.
- 5.4.21 I have commented previously, in sections 5.1 and 5.2 of this report, on the need for flexibility regarding appropriate uses for potential future development of the significant area of land at Claywheels/Beeley Wood Lane. However, the future aspirations of the landowners may change. Furthermore, I consider that Policy SUD1 provides important support for the bid for funding for the proposed transport improvements beyond the relatively short timescale of LTP2. Thus I do not consider that their delivery is unduly aspirational or that retained reference, at paragraph 17.6 of the Core Strategy, to a proposed bridge over the River Don is inconsistent with my recommendations elsewhere that specific references to the Claywheels area should be deleted from Policy SB4 (PC188) and Policy SUD1 (IC59).
- 5.4.22 **I conclude that the policies and proposals of the Core Strategy for efficient and sustainable transportation are sound provided that the following changes are made, full details of which are given in Annex A of this report; (PC93, PC257, PC94, PC109, PC111, IC34, IC35, IC36 and IC37).**

5.5 THE NATURAL ENVIRONMENT AND DISTINCTIVE BUILT HERITAGE OF SHEFFIELD

Main Matter - Whether the policies of the Core Strategy for protecting and enhancing the natural environment and the distinctive built heritage of Sheffield are consistent with national and regional policy, the most appropriate and based on a robust evidence base, and are sufficiently flexible.

a) The Natural Environment

- 5.5.1 Strand 7 of the Core Strategy Vision informs that the natural environment of Sheffield will be prized, protected and enhanced. This aim is translated into the Spatial Strategy by concentrating new development in the main urban areas and by increasing average densities within the existing built-up areas, rather than by spreading out into the surrounding countryside, which will remain protected as Green Belt. The protection of the countryside including the Green Belt would be implemented through Core Strategy Policy SE1.
- 5.5.2 This approach is clearly consistent with PPG2 and it also conforms to Policy YH9 of the RSS [RD23], which informs that the general extent of the Green Belts should not be changed. RSS Policy YH9 goes on to permit their localised review, but only if justified by exceptional local circumstances. In sections 5.1 and 5.2 above I have concluded that the Core Strategy makes sufficient provision for housing

land, as retrospectively confirmed by the SHLAA [BD40], and significantly over-provides for employment land.

- 5.5.3 I acknowledge that there are sites just within the inner Green Belt boundary for Sheffield that are locationally more sustainable than some sites that may be designated as Major Developed Sites in the Green Belt and/or allocated for housing in the forthcoming City Sites DPD, but this factor alone does not amount to the exceptional circumstances that would justify a local review of the Green Belt, especially as the thrust of the Spatial Vision is for regeneration rather than expansion of the urban areas.
- 5.5.4 Furthermore, as I have concluded in section 5.1 above, the required provision for employment land has been significantly over-estimated in the submitted Policy SB1. My recommended change to that Policy (IC56) could result in additional land being made available for housing, so that if in the medium to long term more dwellings are required, non-protected employment land would be available to accommodate them, thus providing necessary flexibility without resorting to taking land out of the Green Belt. Consequently, I conclude that Policy SE1 meets tests iv and ix.
- 5.5.5 However, my concern is that the Policy is weak because it does not make sufficiently clear the Core Strategy's intended strong position regarding the permanence of the Green Belt boundaries; it delegates important policy detail concerning the correction of boundary anomalies to supporting text and it combines protecting the Green Belt with protection of the countryside generally. For these reasons I do not consider that the Policy meets test vii. Therefore, the Core Strategy is unsound in this regard.
- 5.5.6 In response to these concerns, which I raised at the Exploratory Meeting, the Council suggests change (PC31) that would split Policy SE1 into two policies; amplified Policy SE1 - Green Belt and new Policy SE1A - Countryside not in the Green Belt. The proposed supporting text for the amplified Policy SE1 is taken from paragraph 11.4 of the submitted Core Strategy but also draws on text in the Environment Background Report [BD07], paragraphs 2.49-2.53. New Policy SE1A would incorporate Policies SMW2 and SST2, which are Area policies that would become superfluous and should be deleted as detailed in **(IC41)**, and its supporting text is taken from Policy SMW2 and the section on Hollin Busk in the Chapeltown/Stocksbridge Background Report [BD16]. Thus no further public consultation or SA is necessary for this suggested Policy change.
- 5.5.7 I generally support change (PC31), which would rectify the weaknesses of submitted Policy SE1 that I refer to in paragraph 5.5.4 above and would make the Core Strategy sound in this regard. Specifically, it would clearly raise the profile of the Green Belt as distinct from the countryside in general. It would flag up that untenable anomalies of the Green Belt boundary will be corrected and would thereby provide an LDF policy context for subsequent DPDs and changes to the Proposals Map, in which such corrections would be precisely identified. In addition, it would reduce unnecessary policy repetition. As a matter of consistency to make the Core Strategy sound, the second sentence of paragraph 4.27 of the Core Strategy should also be changed to, 'will remain' protected as Green Belt, from, 'will be' **(IC42)**.
- 5.5.8 However, any changes that I recommend to the Core Strategy must themselves be sound. As discussed at the hearing session, there are minor word changes necessary to the supporting text of proposed amplified Policy SE1 to aid clarity. In

addition, as also discussed, it is necessary to provide a policy context for resolving the fate of potential Major Developed Sites in the Green Belt.

- 5.5.9 In preparing the Sheffield UDP (1998) [CD13], the Council decided not to identify any Major Developed Sites in the Green Belt and the Inspector for that Public Inquiry did not recommend that such sites should be designated. He did, however, recognise that Sheffield's Green Belt includes several sites that could, in principle, qualify for designation but recommended that this aspect of policy could be left to the subsequent review of the UDP. However, the Core Strategy is silent on this matter.
- 5.5.10 From the evidence and the discussion at the hearing sessions, I consider that the benefits for and against designating all or some of these sites as Major Developed Sites in the Green Belt, as referred to in Annex C of PPG2, is very finely balanced.
- 5.5.11 The advantage of making such designations is that it provides clarity on the scale of future development that may be permitted. The advantage perceived by the Council of not designating them would be no apparent weakening of Green Belt policy. It gives a clear signal that development is not acceptable in principle and therefore that any proposals would be dealt with as departures. For development proposals that would be departures from Green Belt policy the Council would still be able to use other development plan policies to guide development or mitigate harmful effects, if it was minded to grant permission. Where proposals for redevelopment have arisen on other previously developed sites in the Green Belt (e.g. Folkwood School, Stradbroke College), the Council has previously used the principles in Annex C of PPG2 as a guide to the amount of development that is appropriate. However, I consider this approach to be perverse and it fails to provide sufficient certainty regarding future development at these sites.
- 5.5.12 Nevertheless, I consider that the matter of whether to designate Major Developed Sites in the Green Belt is essentially a 'site' issue, which individually does not raise matters of strategic significance that need to be dealt with specifically in the Core Strategy. This should more appropriately be addressed within the emerging City Policies and City Sites DPDs and the Proposals Map. But in order to provide an SLDF policy context for any such designations, some reference to this possibility should be made in the Core Strategy. I have included this addition to the supporting text in my revisions to (PC31) (Policy SE1), which I refer to as (**PC31A**) in Annex A to this report.
- 5.5.13 New Policy SE1A consolidates the Core Strategy approach towards countryside that is not within the Green Belt and complements amplified Policy SE1. For the reasons that I give in paragraph 5.5.8 above, this Policy is necessary to make the Core Strategy sound. However to add clarity, a small change is required to the supporting text of the new Policy proposed by (PC31). I have made this necessary amendment in (**PC31B**).
- 5.5.14 To complement the suite of Core Strategy policies aimed at protecting and enhancing the natural environment, submitted Policy SE2 seeks to maintain the Strategic Green Network, which follows the rivers and streams of the main valleys. For internal consistency between the Policy and its supporting text at paragraph 11.7 and to thereby make Policy SE2 sound in terms of test vi the words, 'and where possible enhanced' should be added after the word, 'maintained' in the second line of the Policy, as set out in (**IC44**). I am satisfied that the corridors identified in the Policy are appropriate for inclusion in the Network, that there are clear mechanisms for implementing the Policy and that it is sound in all other regards.

b) The Distinctive Built Heritage

- 5.5.15 The Core Strategy Vision Strand 7 referred to in paragraph 5.5.1 above also informs that the distinctive heritage of Sheffield will be prized, protected and enhanced and that high quality buildings and spaces will be promoted. However there is no over-arching design policy that would enable this aspect of the Spatial Vision to be implemented. This is a fundamental policy gap that I raised with the Council at the Exploratory Meeting. In response it has suggested new Policy SE2A (PC40), which has been the subject of full public consultation and sustainability appraisal.
- 5.5.16 Reflecting representations arising from the consultation exercise and comments made at the hearing session, at which it was discussed, further revisions to the suggested new Policy SE2A are proposed by the Council. These would make the Policy more locally distinctive by making reference in its criteria to elements of landscape and townscape that are specific to Sheffield, including its South Western sub-urban area. In addition, its implementation and monitoring would be made more robust by the suggested reference to the need for residential schemes of 10 or more dwellings to achieve a 'Building for Life' assessment of 'good', as a minimum. I consider that Policy SE2A is necessary to make the Core Strategy sound, with reference to test vi. Furthermore, I conclude that with all of the recommended changes to the proposed new Policy, which are consolidated in (**PC40A**) new Policy SE2A meets all of the soundness tests, would complement the three other policies of the submitted Core Strategy that address design issues in specific locations (Policies SE3, SSW1 and SCC8) and would make the Core Strategy sound in terms of test vi.
- 5.5.17 Turning now to the design policies for specific locations, Policy SE3 seeks to improve Gateway Routes into and through the city. For completeness and to meet soundness test vii, part (a) of the Policy should be changed to include reference to an extended route that includes the 'Heritage Canyon', which is a distinctive approach into the city bordered by listed buildings. This necessary change is set out as (**PC90**) in Annex A.
- 5.5.18 Policy SSW1 seeks to safeguard and enhance the distinctive townscape of the south-western part of Sheffield, which includes the Dore Village area. It is characterised by Victorian suburbs, parks, open spaces, trees, large houses set in spacious plots with mature gardens and stone built houses in the older suburbs. The Policy intends to limit the scale of new residential development to that which may mainly be accommodated at an appropriate density through infilling and at windfall sites, in order to preserve its character that has been described by some as 'Arcadian' in parts. The Policy should be read together with Policy SH5, as recommended to be changed by (IC82), which sets out appropriate density ranges for residential development in various types of location. In my opinion it would be inappropriate and unjustified to apply a blanket, low-density limit of less than 30 dwellings per hectare over the whole of the South-Western area, as suggested in some representations, although a lower density may be appropriate at particular sites. This would not be precluded by Policies SSW1 or SH5.
- 5.5.19 However, to clarify and to aid implementation of Policy SSW1, the particular townscape characteristics that the Policy is seeking to preserve should be referred to in its supporting text, as set out in (**PC114**) to make the Policy sound in terms of tests vii and viii.
- 5.5.20 Policy SCC8 indicates that tall buildings may be appropriate in certain places in the City Centre and sets out criteria that directs proposals to such suitable

locations. However, taking into account the benefits of tall buildings in promoting character and local distinctiveness, provided that they are in the right location and are of the appropriate height and design as indicated in the City Centre Urban Design Compendium [PD10], I do not consider that the Policy is sufficiently positive. The words, 'may be' in the first sentence of the Policy should be substituted by, 'are', as detailed in (IC45). In addition, the positive statement of the Design Compendium should be reflected in the preamble to the Policy at paragraph 15.32 of the Core Strategy, as detailed in (PC107).

- 5.5.21 A further concern that I have with this Policy is that it is intended to identify specific locations for tall buildings in a forthcoming SPD. Such buildings have a dramatic impact on the townscape and skyline and can be the subject of significant controversy. In my opinion, representations to such designations for the location of tall buildings should be capable of being considered at an independent public examination. Therefore I have changed paragraph 15.33 of the Core Strategy to inform that specific locations may be identified in the City Sites DPD and the Proposals Map, as set out in (IC46). With these changes the Policy meets the soundness tests.
- 5.5.22 **I conclude that the Core Strategy is unsound having regard to its policies and proposals for protecting and enhancing the natural environment and the distinctive built heritage of Sheffield, principally because they lack clarity concerning the approach towards maintaining the Green Belt and to urban design. However, it can be made sound provided that the following changes are made, full details of which are given in Annex A of this report: (PC31A, PC31B, PC40A, PC90, PC107, PC114, IC41, IC42, IC44, IC45 and IC46).**

5.6 **THE GLOBAL ENVIRONMENT, CLIMATE CHANGE, RENEWABLE ENERGY AND WASTE MANAGEMENT.**

Main Matter - Whether the Core Strategy pays proper regard to the global environment and implications of climate change, with particular reference to:

a) Waste management

b) Climate change and renewable energy/reduction of carbon emissions

c) Flooding and flood risk

a) Waste Management

- 5.6.1 I consider that the waste strategy set out in Policies SW1-SW3 of the Core Strategy is entirely consistent with the key sustainability objectives of PPS10 in that it addresses waste as a resource, it shows how management of waste will be driven up the 'waste hierarchy' and it helps to implement the National Waste Strategy (2007), including its supporting targets. The objectives of Policy SW1 conform with policy ENV12 of the RSS, are consistent with PPS10 taking into account the specific circumstances of Sheffield that I discuss below, and they have been informed by the Council's own Household Waste Strategy 2003-2010 [PD04].
- 5.6.2 That Strategy is itself influenced by the considerable investment that the Council has already made in its new energy recovery facility. That facility is flexible and carbon efficient because it provides an alternative power supply, heats over 140 buildings in and around the City Centre and handles more than one waste stream.

The Strategy also includes meeting statutory re-cycling targets, but is not based on maximising re-cycling rates.

- 5.6.3 However, in the specific circumstances pertaining to Sheffield I consider this to be the most appropriate approach, which is supported by the Companion Guide to PPS10 that emphasises that Regional Spatial Strategy should generally avoid transposing national re-cycling targets down to the local level, because Waste Planning Authorities will vary in their ability to meet such targets. At its paragraph 6.52 the Guide also expects Regional Spatial Strategy policy requirements to make allowances for Authorities, like Sheffield, that have entered into long-term binding contracts that influence the management of their municipal waste stream. Although the evidence indicates that the Council's Waste Strategy is unlikely to alter radically in favour of high recycling rates in future years, unless some forms of processing, such as re-use of incinerator bottom ash, are officially re-classified, I am satisfied that the Council is making a strong contribution to the new national recovery targets for waste, but its prior investment in energy recovery means that it lacks the ability to also achieve the high re-cycling targets that others might aspire to. Nevertheless, I conclude that the waste policies of the Core Strategy appropriately interpret the 'waste hierarchy' of PPS10 and that test iv is met in relation to national policy.
- 5.6.4 The evidence that is relied upon for the 3 waste management policies of the Core Strategy is derived from 3 main sources; the Household Waste Strategy 2003-2010 [PD04], the Waste Management Background Report [BD08] and the revised waste forecasts published in September for the draft RSS [RD16], which are unchanged in the published RSS [RD23] with regards to the district level apportionment. However, revised figures set out in Tables 10.5 and 10.6 of the published RSS show lower apportionments for Sheffield for managing municipal and commercial/industrial waste than those recommended in the RSS EiP Panel Report [RD17] and they take account of existing capacity as summarised in RSS Table 10.7. The implications of these RSS changes are that the city has ample capacity, and greater than that shown in the submitted Core Strategy (Table 12.1) to meet future requirements to 2026 for the specified waste streams. RSS Table 10.8 confirms the sufficiency of landfill capacity within the South Yorkshire sub-region. Therefore, despite the limited 'shelf-life' of the Household Waste Strategy I am satisfied that this evidence base is robust and that the Core Strategy makes appropriate provision for municipal and commercial/industrial waste for at least 15 years.
- 5.6.5 I conclude that although it would have been preferable for the Core Strategy to be informed by a longer term Municipal Waste Strategy I am satisfied by the evidence that an early review of the Household Waste Strategy will not undermine the basis of its waste management policies.
- 5.6.6 With regards to flexibility, I consider that criteria (e) and (f) of Policy SW1 provide sufficient guidance on where additional treatment facilities may be located and since they are not site specific, choice of sites is enabled, thus the Policy is flexible. However, as it was discussed at the hearing session, practical implementation of these criteria requires pragmatic rather than purist decision making at the development management level, because some uses associated with waste treatment facilities may be considered to be sui generis and do not fall neatly into a 'B' class of the Use Classes Order.
- 5.6.7 My overall conclusion is that the 3 waste management policies of the Core Strategy meet soundness tests vi, vii, viii and ix, but to meet test iv in relation to

regional policy they should be changed to reflect the requirements of the published RSS. Changes to paragraphs 12.2 and 12.3 that precede Policy SW1 and to Table 12.1, as set out in (**PC497, PC498 and PC377**), are required to bring the Policy into general conformity with the RSS, to meet soundness test iv and to thereby make the Core Strategy sound.

b) Climate change and renewable energy/reduction of carbon emissions

- 5.6.8 At the Exploratory Meeting I alerted the Council to my concerns that despite that Strand 6 of the Vision of the Core Strategy addresses climate change and this matter being very high on the Government's planning agenda, the DPD does not contain a clear strategic policy that sets out the SLDF decision making framework to ensure that development in Sheffield will contribute to global sustainability. With reference to PPS22, nor does it have a clear strategy for reducing carbon emissions. Following from this, I consider that the intention of the Core Strategy to delegate these strategic policy matters to the subservient City Policies DPD is inappropriate. Thus in these regards the Core Strategy fails to meet tests iv and vi and is unsound.
- 5.6.9 In response, the Council proposes a suite of new policies to be included in the Core Strategy to complement submitted Policies SE4 – Air Quality and SE5 – Renewable Energy Generation. These are; Policy SE5A – Responses to Climate Change, Policy SE5B – Sustainable Design of Buildings and Spaces and SE5C – Renewable Energy Generation, which would replace Policy SE5.
- 5.6.10 Policy SE4 does not indicate what precise actions the Council will take to protect the air quality of the City. However, I consider that it appropriately provides a policy hook and sufficient flexibility for the Council to implement a Low Emission Zone or Strategy, if it resolves to do so at a future date that might be taken forward through an SPD. I conclude that this Policy is sound.
- 5.6.11 Proposed new Policy SE5A (PC32) gathers together the main themes on climate change already included in the Core Strategy to form a single over-arching policy statement; therefore no further public consultation or SA is required. The proposed supporting text introduces the Policy by informing that, 'Action to reduce the impact of climate change is a key part of the overall vision of the Core Strategy and its specific objectives for reducing the need to travel, supporting sustainable transport and sustainable design and development...' The Policy then lists those actions in 2 groups; action to reduce the city's impact on climate change and action to adapt to expected climate change.
- 5.6.12 The Policy adds to PPS1 by focusing specifically on climate change as a part of sustainable development and it builds on paragraph 20 of PPS1 by showing how action will be taken to achieve mitigation and adaptation. The Policy also adds to the PPS1 Supplement by giving a local dimension to the mitigation and adaptation measures, for example through particular references to prioritising development in the City Centre, eliminating unacceptable flood risk in the Don Valley and tributaries, and to the City's Green Network.
- 5.6.13 I consider that a Policy of this type is necessary to bring together strategic policy themes that will contribute to global sustainability and to make the Core Strategy sound. However, in order that it meets all of the soundness tests minor revision is required to the wording of criterion (h), which is not PPS3 compliant regarding brownfield/greenfield considerations. I have, therefore, amended criterion (h) and inserted it in new Policy SE5A as (**PC32A**).

- 5.6.14 New Policy SE5B proposed by suggested change (PC34) has been the subject of full public consultation and Sustainability Appraisal. Its purpose is to aid the reduction of the carbon emissions of the city by requiring the design and construction of new development to be energy efficient, working on the 'prevention is better than cure' principle. I consider that this is an important policy statement to be made in the Core Strategy and it sets local standards for the application of the Code for Sustainable Homes and BRE Environmental Assessment Method (BREEAM) assessment codes to ensure that sustainable design is incorporated as widely as possible in the city and to ensure deliverability.
- 5.6.15 To satisfy the Policy, the justification text informs that all new developments of 5 dwellings or over (including apartments) should achieve Code for Sustainable Homes Level 3 (or equivalent) as a minimum, and all non-residential developments over 500 sq m gross internal floorspace should achieve a BREEAM rating of 'very good' (or equivalent) as a minimum.
- 5.6.16 I consider that these thresholds and standards are challenging, but it was clarified at the hearing session that Code for Sustainable Homes Level 3 is already required as a minimum on all HMR sites in the city, and in the case of affordable housing developments, Level 4 is being achieved for the latest schemes. If it is realistic and deliverable for these sectors, I see no reason why it would not be so for other sectors of the housing market that are able to reap greater returns on new development. I am satisfied that the thresholds and standards are justified, appropriate and deliverable.
- 5.6.17 In response to representations made to the Policy and in the light of discussion at the hearing session the Council has suggested several changes to the Policy and supporting text, including a change to its title; 'Climate Change, Resources and Sustainable Design of Developments', which I agree more accurately reflects the scope of the Policy. Other suggested changes include omission of limiting energy efficiency to the use of passive solar design principles, including reference to minimising impact on existing renewable energy installations and addition of a reference to the value of green roofs as a sustainable drainage technique, all of which would add clarity to the new Policy.
- 5.6.18 In addition, a suggested further change to the justification text would clarify that the targets referred to in paragraph 5.6.15 above may increase, and the thresholds decrease, as advances in technology enable higher standards of sustainable design. This would add flexibility to the Policy and recognises that national standards are likely to change in the future. For example, BREEAM 'very good' is currently required for commercial developments, but if a new system for assessing commercial developments were to be introduced, the standard in the Policy could be changed to reflect this. Furthermore, because the requirements are set as indicative in the justification text, there is flexibility to change them as necessary through SPDs to ensure high standards are continually met.
- 5.6.19 With these changes that I have consolidated as (**PC34A**) I conclude that Policy SE5B would meet all of the soundness tests and is necessary to make the Core Strategy sound with particular reference to test vi.
- 5.6.20 The submission version of Policy SE5 states that renewable energy capacity in the city will exceed 12MW by 2010 and 60MW by 2021. These targets slightly exceed those set for Sheffield in Table 10.2 of the RSS, but from evidence provided in the Environment Background Report [BD07] I am satisfied that they are achievable from schemes under construction and from the proposed biomass plant in the

Lower Don Valley, which could generate as much as 30MW, and from smaller but significant amounts, which could be generated in the areas identified with potential for wind generation in the Policy. As technologies develop and demand for renewable energy generation increases, it is reasonable to assume that there will be mechanisms to achieve and exceed these targets.

- 5.6.21 However, the Policy fails to reflect the requirements of national and regional policy contained in RSS policy ENV5, to promote and secure greater use of decentralised and renewable or low carbon energy in new development by the setting of evidence based viable targets. Therefore it is not sound with reference to test iv.
- 5.6.22 Policy SE5C, proposed by suggested change (PC33) seeks to address this. It expands and would replace submitted Policy SE5 and has been the subject of full public consultation and Sustainability Appraisal, in response to the former of which further changes to the Policy are suggested by the Council, as listed in [ED25]. The suggested main changes and subsequent refinements to Policy SE5 delete reference to 'Westwood' as a preferred location for larger-scale wind farm development and include targets for renewable or low carbon energy provision.
- 5.6.23 Suggested deletion of reference to 'Westwood' as a preferred location for larger-scale wind power generation reflects changed political preferences resulting from change of party control of the Council that has taken place during the Examination process. Whilst this factor does not affect the identified suitability of the site, which is owned by the Council, I acknowledge that its deliverability is constrained by the current local political climate, although this could change during the Plan period. Nevertheless, I am satisfied that with a caveat to the Policy; that other sustainable locations are not excluded, the amended Policy would have necessary flexibility to potentially enable windfarm development in Westwood area in the future. However, for consistency, its location should be removed from the Key Diagram and the two other potential locations named in the Policy should be shown (**IC74**).
- 5.6.24 The suggested targets and thresholds for the amended Policy SE5C require all significant developments, unless it can be shown not to be feasible and viable, to a) provide a minimum of 10% of their predicted energy needs from decentralised and renewable or low carbon energy, and b) to generate further renewable or low carbon energy or incorporate design measures sufficient to reduce the development's overall predicted carbon dioxide emissions by 20%, which would include the decentralised and renewable or low carbon energy required to satisfy a). 'Significant developments' applies to both new-build and conversions of 5 or more dwellings (including apartments), or more than 500 sq m gross internal floorspace.
- 5.6.25 The suggested revised form of the Policy recognises that achieving the required carbon reduction target through renewable energy production may not always be possible, depending on the constraints of a site. It also affords flexibility in allowing the same level of carbon dioxide emissions reductions through design or a combination of the two. As the target in sub-paragraph (b) of the suggested Policy is expressed in terms of reduced carbon emissions, this enables consistency whichever method is chosen and relates directly to the outcome needed to mitigate climate change.
- 5.6.26 I am satisfied that the targets proposed are appropriate, realistic and deliverable with current technology. The suggested required 20% reduction in part b) is of the same order as the Code for Sustainable Homes Level 3, which requires residential developments to achieve a 25% reduction on Part L of the Building

Regulations (2006). This is already required on all publicly funded housing in the city and on this basis should not be considered excessive for the private sector. This level from the Code for Sustainable Homes is also consistent with an indicator of satisfying Policy SE5B in the case of residential development. There is currently no equivalent to the Code for Sustainable Homes for non-residential development, but the proposed 20% reduction would ensure that carbon emissions from new non-residential development are also significantly reduced.

- 5.6.27 Part of a) of the suggested amended Policy, which requires that the carbon emission target is partly achieved by 10% renewable energy generation, is not a requirement for Level 3 of the Code for Sustainable Homes but reflects the tested approach used in other authorities such as Merton, which has proved to be achievable and deliverable. It is also implicit in its use in the RSS. In addition, the 10% renewable energy target is already a requirement on all HMR sites in the city and some 'gold' sites require 20% , showing that the requirement for it is feasible. However, in developments where it can be demonstrated that it would not be viable to meet these targets, the Policy allows for the payment of a contribution towards an off-site carbon reduction scheme instead.
- 5.6.28 Taking all of these factors into account I conclude that amended Policy SE5C, as consolidated in (**PC33A**) meets all of the soundness tests and is necessary to make the Core Strategy sound.

c) Flooding and Flood Risk

- 5.6.29 Another matter of concern raised with the Council at the Exploratory Meeting is the absence of a policy in the Core Strategy setting out the strategic approach to flooding and flood risk, given that this is a serious issue for parts of the Sheffield area. Furthermore, since the Strategic Flood Risk Assessment (SFRA) [BD22] that forms part of the evidence base for the Core Strategy pre-dates PPS25 it is not clear how the sequential tests of PPS25 have been applied to the formulation of the Spatial Strategy and to the specific policies and proposals of the Core Strategy. Consequently, I consider that the Core Strategy is unsound in terms of tests iv and vii.
- 5.6.30 The Council has sought to address this by suggesting a new Policy SE5D; Flood Risk Management (PC35), which has been the subject of full public consultation and Sustainability Appraisal, following from which it suggests additions and amendments to the new Policy and its supporting text. Consequential changes are also suggested to Policies SCC6, SNE2 and SLD1, which respectively refer to housing in the City Centre, development in the Blackburn Valley and at Meadowhall.
- 5.6.31 Considering firstly the evidence base, the original SFRA [BD22] was prepared in close conjunction with the Environment Agency, and the final version was delayed to take account of PPS25. It was designed to be a 'living' document and has now been updated and expanded in line with advice from the Environment Agency. The latest SFRA is in three parts; the main Level 1 document for the whole city [BD41], and two more detailed Level 2 documents for Nursery Street and the Wicker, and Kelham Island [BD41A/B]. The Environment Agency has been party to the signing off of the first two documents, but further work is needed for the Kelham Island Level 2 document before it can be signed off. This work was anticipated to be completed in mid-August but was outstanding when the hearing session was held on 11th September 2008.

- 5.6.32 I am satisfied that the updated SFRA, which takes account of the June 2007 flooding event in parts of the city and recent modelling of other rivers such as the Porter Brook, is in line with both PPS25 and its Companion Guide. In the light of the sequential tests of PPS25 that have subsequently been applied to the Core Strategy suggested changes (**PC104, PC105, PC379 and PC380**) are necessary to make Policy SCC6 sound in terms of tests iv and vii. In addition, the supporting text for Policy SNE2 should be amended at paragraph 19.6 in accordance with (**PC381**) by deleting the words, 'But the valley' and substituting, 'But parts of the valley are occupied by developed flood plain, where the extent of the built area should not be increased (see Policy SE5D)', in order to make it sound with reference to tests iv and vii. (**PC110**), which would insert references to flood risk at paragraph 16.10 is necessary for the same reason.
- 5.6.33 Turning now to the suggested new Policy SE5D and the several further suggested amendments to it and its supporting text listed in [ED25], I consider that the Policy is necessary to cover a gap in the Core Strategy policy coverage and to reduce the need to delegate matters of strategic importance to lower order DPDs. The suggested Policy contains criteria in two parts; the first seeks to limit the extent and impact of flooding and the second part sets out mitigation measures in accordance with the exceptions test. The supporting text informs that surface water must be reduced to 5 litres per second/per hectare on all sites over 1.0 hectare, except on brownfield sites where the developer can prove that there is existing surface water run-off. On such sites, run-off must be reduced by 30%. On sites that are less than 1.0 hectare or 10 dwellings, surface water run-off must be reduced as far as is feasible by design measures such as permeable paving. This requirement reflects the standard that is required by the four South Yorkshire authorities and defines criterion a) of the Policy that requires all developments to significantly limit surface water run-off.
- 5.6.34 I have consolidated (PC34), further necessary changes suggested by the Council and listed in [ED25], and other changes suggested by the Environment Agency in (**PC35A**). Cumulatively these form new Policy SE5D. I am satisfied that with these recommended changes this new Policy meets all of the soundness tests and that it is necessary to make the Core Strategy sound.
- 5.6.35 **My overall conclusion on this matter is that the Core Strategy is unsound because it fails to pay proper regard to the global environment and implications of climate change, with particular reference to waste management, climate change and renewable energy/reduction of carbon emissions, and flooding and flood risk. However, it can be made sound provided that the following changes are made, full details of which are given in Annex A of this report: (PC497, PC498, PC377, PC32A, PC34A, PC33A, PC104, PC105, PC379, PC380, PC381, PC110, PC35A and IC74).**

5.7 IMPLEMENTATION, DELIVERY AND MONITORING

Main Matter - Whether the policies and proposals of the Core Strategy have clear mechanisms for delivery, implementation and monitoring.

- 5.7.1 PPS12 stresses that policies of DPDs should be the delivery and implementation tools of the strategic spatial strategy, rather than simply being aspirational public relations documents or a means of regulating and controlling development, which was key to the former development control system. From the evidence and discussion at the hearing sessions, I am satisfied that the Sheffield Core Strategy strikes the right balance. However, in common with many DPDs whose production

was commenced early into the LDF system the level of detail given on implementation, delivery and monitoring mechanisms is not sufficiently precise or transparent and the submission DPD is unsound in these regards. Furthermore, paragraph 1.10 of the Core Strategy indicates that there may be significant resourcing difficulties that could trigger its early review in less than five years. I raised these matters with the Council at the Exploratory Meeting and in my Matters and Issues papers. In response to the latter issue the Council has subsequently confirmed that this would not be the case, and from what was said at the hearing sessions, I am satisfied that the resourcing mechanisms for implementing the policies and proposals of the Core Strategy are sufficiently flexible and that it is unlikely that it would be necessary to review the Core Strategy within five years for this reason. (**PC46**) would clarify this.

- 5.7.2 A paragraph of supporting text containing limited information on the anticipated main delivery mechanisms and agents follows most of the part 2 City-wide policies and lists of targets are included at the end of the part 2 Chapters. However this information does not generally contain details of specific anticipated implementation partners, funding, timescales or indicators, although such information is, in many cases, included in the Background Reports that comprise part of the evidence base for the Core Strategy. In particular, it is not clear from the submitted DPD if all of the transport proposals, including the M1 Junction 34 relief road (Halfpenny Link) referred to in Policy ST10 and the priority improvements to Gateway Routes listed in Policy SE3 are realistic rather than aspirational.
- 5.7.3 Part 4 of the Vision, Objectives and Strategy Background Report [BD01] sets out the Council's overall approach towards monitoring the delivery of the Core Strategy's policies and proposals. It summarises the national monitoring requirements and describes how these have influenced the targets and indicators included in the Core Strategy. Paragraph 17.18 explains that the main monitoring mechanism will be the SLDF Annual Monitoring Report (AMR), but it also draws attention to other monitoring that will be undertaken. Table 17.1 of [BD01] lists the SLDF Targets and Output Indicators for each of the City-wide policies.
- 5.7.4 In response to my request for more precise details and greater transparency, especially concerning implementation partners and mechanisms and monitoring, the Council has drawn this information together into two appendices and has suggested that a cross reference to them should be added to paragraph 5.1, which introduces the Policies Section of the DPD, to aid clarity and coherence, as set out in recommended change (**PC62**).
- 5.7.5 (PC119) which is listed in [ED25] proposes new Appendix AB, which would indicate the anticipated delivery mechanisms and partners, together with broad timescales for delivery and whether funding or other resources are committed for each of the City-wide and Area policies. Following discussions at the hearings sessions this has been revised as (**PC119A**) to update factual matters, to include similar details for the Council's suggested new policies that I have recommended in the relevant section 5 above and to re-order the list of policies to correspond with the amended structure for the Core Strategy that I recommend at paragraph 4.21. This additional Appendix, which would be the first of the Core Strategy, is required to give necessary certainty and transparency to the implementation of the policies and proposals and to thereby make the Core Strategy sound in this regard. In addition, amendments are required to paragraphs 9.2, 9.5 and 11.7 to clarify the required delivery mechanisms for policies SEH1 and SE2 as set out in (**PC87, PC88 and PC92**).

- 5.7.6 (PC120) of [ED25], proposes new Appendix AC, which would be the second of the Core Strategy appendices and would specify the Targets and Indicators for each of the City-wide policies. Since the Area policies generally give a spatial dimension to the part 2 City-wide policies I consider that it is acceptable that no separate Targets or Indicators are given for the Part 3 policies. The new Appendix 2 draws its information from Table 17.1 of [BD01]. However, as with new Appendix 1, following discussions at the hearing sessions it has been revised as (**PC120A**). These revisions clarify whether the targets are minimum requirements or maximum ceilings and the time period over which achievement will be measured. They also re-order the list of policies to correspond with the amended structure for the Core Strategy that I recommend at paragraph 4.21. From the written and oral evidence I am satisfied that the Targets and Indicators recommended in (PC120A) are SMART, in that they are specific, measurable, appropriate, realistic and time related. Where appropriate, the Government's Core Output Indicators have been used.
- 5.7.7 Some of them are challenging, for example that for Policy SH4, which requires that 'at least 12,000 dwellings (an average of 860/year) completed in the HMRA over the period 2004 to 2018', because according to the 2006 AMR [CD10] completions during the period 2001 to 2006 have been less than half this. Consequently this has been moderated by recommended change PC120A, which would reduce the target to at least 8,150 dwellings (an average of 625/year) over the period 2008-2021. Nevertheless, it is a specific challenge of the Core Strategy to significantly improve past HMR delivery performance. Some of those for the transport policies are inevitably fairly short term, because they reflect commitments contained in the current South Yorkshire Local Transport Plan [RD06].
- 5.7.8 I conclude that the proposed additional Appendix AC is required to give necessary clarity and transparency to monitoring the delivery of the policies and proposals of the Core Strategy and to make it sound in this regard. However, to avoid repetition, the targets given at the end of the Chapters in part 2 of the Core Strategy should be deleted. (**IC40**)
- 5.7.9 Annex B of PPS12 stresses the importance of taking a strategic approach to infrastructure requirements/provision in the preparation of DPDs. The Core Strategy does not include a specific policy that addresses this requirement. However, I am satisfied by the Council's responses to my questions on this matter that this is not a policy gap because there are no identified significant utility infrastructure requirements that constrain the Core Strategy's development policies, which focus on regeneration, except for waste-water treatment works capacity at Deepcar (serving potential new housing in Stocksbridge) and at Woodhouse Mill (serving potential new housing in Owlthorpe). These requirements are referred to in the relevant parts of the Core Strategy.
- 5.7.10 In the case of Stocksbridge, the water treatment capacity constraint is recognised in the Core Strategy in the final sentence of paragraph 24.9. (The position of this last sentence is an editing error and it should be relocated to paragraph 24.5 as set out in **PC118**). In the case of Owlthorpe, the water treatment capacity constraint is recognised in the final sentence of paragraph 22.3 of the Core Strategy, although this is in the context of major economic development rather than housing at Owlthorpe. However, reference to 'other infrastructure' should be added to the Objectives sub-title at paragraph 3.22 of the Core Strategy to affirm the importance of infrastructure provision in accordance with (**PC51**).

5.7.11 **I conclude that the level of detail contained in the Core Strategy on implementation and monitoring is insufficient and that the DPD is unsound in this regard. However, it can be made sound provided that the following changes are made, full details of which are given in Annex A of this report; (PC46, PC62, PC119A, PC87, PC88, PC92, PC120A, IC40, PC118 and PC51).**

OTHER MATTERS

6.1 Some representations raise issues which go outside the context and purpose of the Core Strategy because they relate either to detailed elements of policies or to matters beyond the scope of this DPD. Some points raised in the representations are not directly related to the tests of soundness or are not central to my conclusions on the overall soundness of the Core Strategy. In some cases, they suggest changes to improve the text, which is not part of the soundness process. Similarly, the Council has also suggested numerous changes to reflect comments and/or suggestions and points made in the representations, at the PEMs or at the hearing sessions, and to clarify various matters, correct errors and amend the grammar. However, many of these are unnecessary 'improvements'.

6.2 I have considered all the other points made in the representations and during the Examination, including all of the changes suggested by the Council and listed in [ED25 A-F], and by others, but I find no justification for recommending any further changes to the Core Strategy other than those detailed in Annex A of this report. However, I endorse the suggested minor changes to the policies, text and appendices, as set out in Annex B of this report, because cumulatively rather than individually they are necessary in the interests of coherence, clarity, consistency, and accuracy. I also endorse the correction of any other spelling, grammatical or minor typographical errors. I endorse also minor formatting changes that do not affect the sense or meaning of any text, and the expansion of acronyms to give the full titles of documents, organisations etc.

OVERALL CONCLUSIONS

7.1 **I conclude that, with the amendments I recommend, the Sheffield Core Strategy satisfies the requirements of s20 (5) of the 2004 Act and the associated Regulations, is made sound in terms of s20 (5) (b) of the 2004 Act, and meets the tests of soundness in PPS12 (2004) and (2008).**

Shelagh Bussey

SHELAGH BUSSEY
Inspector