

Our Ref: CM/EK/SheffieldLocalDevelopmentFrameworkCore Strategy:PreferredOptions

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Dear Phil

**Sheffield Local Development Framework
Core Strategy: Preferred Options**

The Yorkshire & Humber Assembly welcomes the opportunity to comment on the emerging Sheffield LDF and to continue its involvement in the development of a coherent spatial planning framework in South Yorkshire. The comments offered in this letter are intended to be within this spirit of continued and productive joint working.

As discussed in your phone call with Rob Murfin on 20 March, the Yorkshire & Humber Assembly wishes to focus its comments at this stage of the consultation on the **Core Strategy: Preferred Options** document, as approved for consultation by Sheffield City Council Cabinet on 8 February 2006. Further comments may be submitted on other LDF material issued for consultation in due course.

At this stage, the Assembly views are officer comments. When the Core Strategy is submitted to the Secretary of State, a formal Assembly view on its general conformity with the Regional Spatial Strategy will be given. Given the content of the Preferred Options document, I do not anticipate any problems of general conformity arising. There are some specific issues highlighted here, however, that the Assembly would wish to see addressed before the Core Strategy is submitted for Examination.

The following officer comments are made in relation to the existing Regional Spatial Strategy for Yorkshire & the Humber (based on the selective review of RPG12 issued in December 2004) and the Draft Regional Spatial Strategy (submitted to the Secretary of State in December 2005). Certain comments also relate to the "South Yorkshire Vision" as agreed by the leaders of the four South Yorkshire local authorities in November 2004.

General Points

Sheffield City Council is congratulated for producing a clear statement of the future development of the city. The LDF strategy sets an ambitious agenda for economic and environmental transformation, yet retains transparent sustainable development principles at its core. The preferred options and their articulation flow logically from the overall vision, aims and objectives of the strategy.

The Assembly particularly supports the approach taken to strategy integration. The Core Strategy is successful in promoting agreed spatial priorities emerging from the Draft RSS, the South Yorkshire Vision, Sheffield City Region Development Plan and the South Yorkshire Housing Pathfinder strategy. It is specifically noted that high-level RSS messages, such as the housing numbers and brownfield targets are reflected in the Core Strategy.

Specific Issues

The following comments are presented in the order that the sections appear in the Core Strategy: Preferred Options document.

Paragraph 3.10 (sustainable development) is supported as an effective statement of the relationship between the different tensions in sustainable spatial planning. It is recommended that a form of this statement be incorporated in the final version of the Core Strategy.

The aims and objectives set out in **Chapter 4** are supported as they usefully complement the Core Approach of Draft RSS (Policies YH1 – YH9) and the sub area guidance for South Yorkshire (including policy SY1).

In **Paragraph 5.3** Chapeltown and Stocksbridge are supported as locations for local needs employment and housing development. This approach to settlements outside the main urban area accords with the South Yorkshire hierarchy set out in Draft RSS Policy SY1.

Paragraph 5.5 promotes the role of the City Centre / urban core as the location for significant economic, commercial and service development, together with a particular emphasis on this being the location for major offices and knowledge based sectors. This is supported as being fully in accordance with the Draft RSS economic policies and the agreed South Yorkshire Vision.

The section on locating **Complementary Employment Areas** (page 21, Paragraphs 5.8 – 5.12) contains many important messages about economic development. The proposed approach to offices, manufacturing and large-scale leisure development are supported.

However, the Assembly is concerned that the proposals in relation to the Sheffield Business Park could potentially undermine demand in the main urban area. It is recognised that

- This area will not be the location for major offices that would be better located in the City Centre, and that
- This location is the **only** major non-central urban area to be promoted for significant economic development in the emerging LDF

It is accepted that employment land portfolios need to provide an “offer” that allows for a range of sizes, types and locations of sites. The Assembly would only wish to see this location identified in the submitted Core Strategy on the assumption that the above restrictions are clearly spelt out.

Paragraph 5.14 indicates that there will be no significant retail expansion at the Meadowhall centre. This message is supported as it accords with both existing and Draft RSS. However, this support needs to be considered in relation to the comments on locating major leisure uses (paragraphs 6.56 to 6.58) that are made below.

The broad approach to sustainable resource utilisation is set out in **paragraph 5.26**. The vision set out in this paragraph could be strengthened to better reflect Draft RSS by-

- Making a statement that, in addition to supporting the provision of sites/facilities for enabling physical recycling, support will also be made for companies involved in the reprocessing of recyclates into useful products/materials. This is a key element of closing the resource “loop”, and;
- Giving a clearer commitment for examining Sheffield’s role in delivering larger scale renewable energy facilities.

The **guidance on land for economic development** (page 27) is supported. This could better reflect Draft RSS by citing the approach to employment land reviews set out in existing and Draft RSS (Policy E3), including the commitment to reallocate (or potentially deallocate) employment land found to be unsuitable for modern economic uses or in unsustainable locations.

Preferred Option PB4 sets out broad locations for innovative or knowledge based industries in relation to the universities and major hospitals. This provision is supported as an important link to Draft RSS Policy E1 “Creating a successful and competitive regional economy”.

The statement on **regeneration and the City Centre and the role of Meadowhall** (Paragraphs 6.56 to 6.58) needs to be clarified. On the one hand, the text correctly highlights the content of RSS as being against expansion at Meadowhall (paragraph 6.56). On the other, **preferred Option PS5** (Paragraph 6.57) then indicates that where leisure and employment cannot be accommodated in the City Centre it will be appropriate to locate it at and around Meadowhall. This is at odds with the text of paragraph 6.58. This appears to indicate that Meadowhall will be a suitable location only if the City Centre or the Lower Don Valley cannot accommodate such uses. The application of this sequential test therefore needs to be clarified.

If it is being suggested that Meadowhall is the only location in the Lower Don Valley that can accommodate major leisure uses, this should be made explicit. Clarification would then be needed on how this approach would be justified bearing in mind the need for a sequential approach to site selection. The Assembly would be particularly concerned if the Core Strategy were to lend support to the expansion of Meadowhall as this could undermine the implementation of RSS.

Paragraph 6.71 refers to forthcoming guidance on criteria for specific housing types, including provision for travellers' sites. It is suggested that the Core Strategy will need to reflect the regional work on Travellers' requirements recently instigated by the Assembly.

I trust that these comments are helpful to you as you prepare the Core Strategy for submission to the Secretary of State. If you wish to discuss any of the points made here, please do not hesitate to contact my colleague, Rob Murfin.

Yours sincerely

A handwritten signature in black ink that reads "Chris Martin". The signature is written in a cursive style with a horizontal line underneath the name.

Chris Martin
Director of Planning and Transport