

# Sheffield Plan

## Explanatory Note: Integrated Impact Assessment (IIA) (SEA) Addendum and consideration of strategic employment issues

### 1. Purpose of this note

- 1.1 To outline the issues the Council has identified in relation to the IIA and the consideration of reasonable alternatives for employment growth.
- 1.2 To suggest how the Council could address the issues that have been identified through an Addendum to the IIA.
- 1.3 To seek confirmation from the Inspectors on whether the Matter 5 hearing session should proceed as planned.

### 2. Background

- 2.1 The Integrated Impact Assessment (December 2022) (CD17) sets out how the IIA has been prepared iteratively to support preparation of the Sheffield Plan and to aid the decision-making process.
- 2.2 Strategic growth options were assessed to inform both the Regulation 18 and Regulation 19 stages. Regulation 18 consultations were undertaken in 2015 and again in 2020; the latter consultation effectively superseded the previous one. Public consultation on the IIA documents took place as part of the consultation on the Regulation 18 and Regulation 19 stages.
  - Regulation 18 consultation (Interim Scoping Report and Interim IIA) (September 2020) (CD54) and (CD 55); and
  - Regulation 19 consultation (Integrated Impact Assessment) (December 2022) (CD17).

### 3. Current approach to considering Reasonable Alternatives for Employment

- 3.1 Section 5.2 of the IIA (December 2022) summarises the employment options and realistic alternatives that were considered in relation to the Citywide Options for Growth (Regulation 18 consultation) in 2015. Paragraphs 5.2.2 and 5.2.3 describe the alternatives, and the more detailed appraisal findings are presented in full in Appendix A (see page 114 – 116 of the IIA).
- 3.2 Section 6.3 of the IIA (December 2022) summarises the employment options that were considered in relation to the Issues and Options (Regulation 18 consultation) in 2020. Paragraph 6.3.1 describes the options, and the more detailed appraisal findings are presented in full in Appendix C (see page 122 – 124 of the IIA). A range of options in respect of the scale of employment growth were considered, ranging between 8 ha – 29 ha per annum. The range of options appraised was based on the evidence available to the Council at that time.
- 3.3 Section 7 of the IIA (December 2022) provides a strategic options appraisal for considering Green Belt locations. Section 7.3 specifically considers strategic locations for employment, with Figure 7.7 identifying the locations, and Section 7.4 outlining the appraisal. Table 7.3 (see page 38 of the IIA) provides a summary of the outcomes of the appraisal, with further

commentary provided in Paragraphs 7.4.14 to 7.4.20. The more detailed appraisal findings of the strategic locations for employment are in Appendix H (page 247 – 265 of the IIA).

#### **4. Concerns over current approach to considering Reasonable Alternatives for Employment**

- 4.1 The Council recognises that there has been criticism that the IIA has not fully considered or explained the approach taken in relation to reasonable alternatives for both the **scale** and **location** of employment land provision (e.g. WS1/6 – submitted by Spawforths (on behalf of Rula Developments)). These representations have been carefully considered by the Council.
- 4.2 The Council has also noted that, whilst the IIA appraised a range of options relating to scale of employment provision between 8 – 29ha, more up to date evidence is now available in the Employment Land Review Update (2021 (EM06) and the Sheffield Logistics Study (2021) (EM30).
- 4.3 The Council proposes an addendum to the IIA to ensure that:
- (a) Reasonable alternatives are re-considered in the context of the most up to date evidence available to the Council, having regard to the evidence in both the ELRU and SLS (above). As set out above, whilst 4 options for growth (ranging between 8ha – 29ha) have already been considered through the IIA, re-appraisal in the context of the most up to date evidence will ensure that the basis for the appraisal of reasonable alternatives is robust.
  - (b) Reasonable alternatives relating to both the scale and the location of employment provision are fully assessed.
- 4.4 For the avoidance of doubt, the Council is proposing that reasonable alternatives in respect of the scale and location of logistics development will be considered through the above assessment.
- 4.5 The proposed detail on each component is set out below:

#### **Reasonable alternatives for the scale of employment**

- 4.6 The Addendum would provide an updated appraisal of reasonable alternatives for the **scale** of employment. Each option would consider the relative scale of general employment needs (Class E, B2 and smaller scale B8) and the specific needs for large-scale warehousing and logistics (B8). Table 1 will provide some indicative options reflecting the range of need (low to high) indicated by the Council's evidence (as set out in the SLS and ELRU) plus a further alternative suggested by Savills (as part of the statement submitted by Spawforths on behalf of Rula Developments) (WS5/6).
- 4.7 Table 2 will set out indicative reasonable alternatives for the **location** of employment, taking into account the locational requirements for logistics uses. This may be refined further following discussion with the authors of the ELRU and SLS.
- 4.8 Tables 1 and 2 are currently being reviewed by the authors of the ELRU and SLS, and will be forwarded as soon as possible, so that it can be published and considered at the examination.

## **Other matters relating to consideration of reasonable alternatives**

4.9 The Spawforths representation also suggests that the site that they promote at Hesley Wood could be allocated as mixed use allocation for employment and Travelling Showpeople, and that it is unclear how the IIA considered alternative sites for Gypsies and Travellers. The IIA confirms (at Section 8) that sites were selected through the site selection process. However, in response to Spawforths' representation, and given that an addendum is in any event proposed to deal with employment matters, the Council proposes further testing of this site through the IIA as a reasonable alternative to assist in meeting the identified needs of Gypsies and Travellers. For the avoidance of doubt, and as reflected in its evidence and site selection process, the Council does not consider that, other than the proposed allocation (at Eckington Way (Site SES03)), there are any other reasonable alternatives within the urban area to accommodate Gypsies and Travellers. Nor has the Council identified any other reasonable alternatives within the Green Belt for such uses. This will also be confirmed in the addendum to the IIA.

## **5. Next steps**

- 5.1 The Council would welcome any comments the Inspectors might have in respect of the proposed approach set out above.
- 5.2 In respect of timetable, the Council understands that the Inspectors' preference was for the Addendum to be produced in parallel to the Independent Examination, and for the employment session to continue on the programmed date.
- 5.3 However, following review of the additional details provided in relation to the IIA in this note, should the Inspectors consider that an alternative approach is now required, the Council suggests that employment matters could be postponed and considered as part of Stage 3 Hearings. This would allow the Addendum to be completed and submitted to Inspectors and for all parties to consider and respond appropriately.

Sheffield City Council

21<sup>st</sup> June 2024