

## Sheffield Plan Examination

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By email via the Programme Officer

6 February 2025

Dear Mr. Johnson,

[Sheffield Plan examination – Stage 2 post hearings letter from the Inspectors](#)

1. Thank you for the Council's contributions and assistance at the Stage 1 and 2 hearings held between June and November 2024. Following the completion of the sessions and publication of requested information we are writing to set out our views on the way forward for the examination.
2. This letter focuses on key areas of soundness where we have particular concerns. It does not cover all of the issues that were discussed at the hearing sessions. This includes a number of potential main modifications necessary for soundness, as set out in the Council's Schedules of Actions and Main Modifications from the Stage 1 and 2 hearings (documents EXAM 61 and EXAM 115). The stated changes and actions in these documents are not rehearsed here, albeit some of the comments in this letter may amend or supersede them.
3. We have taken account of all evidence and representations before us, including written documents and oral submissions at the hearings. This

includes consultation comments on a number of evidence documents published after the Stage 2 hearing sessions.

4. The revised National Planning Policy Framework (NPPF) was published in December 2024. However, as the Plan was submitted in October 2023 the transitional arrangements in paragraph 234 apply. References in this letter are therefore to the relevant previous version of the NPPF dated July 2021 and to previous versions of Planning Policy Guidance (PPG), unless otherwise specified.

### **Housing need/requirement**

5. The application of the Government's standard methodology produces a local housing need figure of 3,018 dwellings per annum (dpa) for the Sheffield area, equating to some 51,306 net additional homes over the Plan period 2022 to 2039. This is based on the Government's standard methodology in December 2022, at the point the Regulation 19 draft Plan was published. The standard methodology figure includes a 35% city uplift as required in the PPG for the 20 largest cities in England.
6. At the hearings the Council confirmed it accepts that the standard methodology figure represents need in Sheffield over the Plan period. However, the Council is of the view that the application of policies in the NPPF to protect areas/assets of importance, namely the Green Belt, provides a strong reason to plan for a lower figure (in line with paragraph 11bi in the NPPF). The Council also considers that exceptional circumstances are not demonstrated to release greenfield Green Belt land on the basis that harm outweighs benefits (paragraph 140 in NPPF).
7. The Council has elected to pursue a spatial strategy which focuses development in built-up areas but accepts that development may be appropriate on sustainably located brownfield sites in the Green Belt. Therefore, the Plan identifies a lower housing requirement figure of 2,040 net dpa, comprising 34,680 net dwellings over the Plan period. The requirement figure is based on the Council's estimate of urban capacity within the built-up area, plus one brownfield site in the Green Belt that the Council determines is suitable and sustainably located (site SS17).
8. We have had regard to a range of evidence documents in considering whether the housing requirement in the Plan is justified and soundly based. This includes Green Belt and site-related evidence, and demographic/economic modelling. These are addressed in turn below.

### *Green Belt and site technical evidence*

9. The Green Belt covers most of the local authority area outside the main settlements. The Council's Green Belt Review 2020 (GB02) shows that many parcels continue to score well overall against Green Belt objectives and technical work shows that some areas have considerable landscape value, particularly those close to the Peak District National Park. The majority of sites have strong scores in terms of Green Belt purposes c and e, namely safeguarding the countryside from encroachment and assisting urban regeneration by encouraging the recycling of derelict and other urban land.
10. However, the Green Belt Review and the Council's further Green Belt work in Action Note 17 (EXAM 95) shows that there are some parcels which have weak or relatively weak ratings in terms of checking urban sprawl and preventing neighbouring settlements merging (purposes a and b). Consequently, some sites have relatively low overall scores and are 'weaker' than others. There are also a significant number of sites with fairly modest overall scores.
11. It is also apparent that the scoring for purpose c is based on whether land is currently in 'beneficial' Green Belt use, e.g. countryside uses. This approach does not take account of factors such as position, location and boundaries which can affect the extent to which a site assists in safeguarding against encroachment. As most Green Belt land is in countryside uses, it means that most parcels score well against this purpose.
12. Furthermore, although all parcels score well in terms of purpose e, there is evidence of different housing markets across the city which serve the needs of different groups in the community. For example, most growth in Sheffield city centre is anticipated to be flatted development whereas a wider mix including family houses is likely on land in the suburbs or on potential Green Belt sites. Sheffield benefits from a large existing stock of houses and the Council has suggested there could be scope to increase the proportion of people living in flats in the future. Nonetheless, the Council's Strategic Housing Market Assessment 2018 (HS05) identifies a specific need for additional houses for families over the Plan period and this information has not been updated in the more recent Local Housing Needs Assessment (2024) (EXAM 66).
13. Furthermore, there is an active programme of urban renewal and significant recent and planned investments in Sheffield city centre and other urban locations which indicates the growing strength of markets in these areas. Taken in the round, these factors suggest that it could be

feasible to release some land from the Green Belt (further to site SS17) without undermining urban regeneration in central areas.

14. The Council's site assessment and Sustainability Appraisal work, as set out in the Integrated Impact Assessment (IIA) (December 2022) (CD17) also shows that a number of site options outside the built-up areas do not have fundamental constraints in terms of landscape or other suitability factors. The work focuses on strategic options (1000 or more dwellings) and brownfield sites in the Green Belt. We requested at the Stage 1 hearings that it should be expanded to include smaller site options on greenfield land in the Green Belt, on the grounds that this is a reasonable alternative strategy and should therefore be subject to appraisal (as set out in EXAM 61). This work has yet to be completed and it is feasible that it could identify further sites without fundamental constraints.
15. The Council has also argued that further development on the edge of Sheffield would result in unsustainable patterns of growth. However, whilst such sites may be some distance from the city centre, many areas on the edge of the city are not far from local shops, services and public transport. This is evidenced in the IIA in relation to some of the strategic sites.
16. It has also not been adequately demonstrated why it is necessary to retain all remaining Green Belt land in order to maintain Sheffield's reputation as the outdoor city or to tackle the climate change and biodiversity emergencies.
17. The Council has suggested that the housing requirement figures of neighbouring local authorities provide flexibility to meet some of the city uplift. However, there are no agreements in place with these authorities to meet any of Sheffield's unmet needs.

#### *Demographic and economic modelling*

18. We have also had regard to evidence regarding the links between housing need and economic growth in Sheffield. The Council's Housing, Economic Growth and Demographic Modelling report (HS06) indicates that the standard methodology figure including the city uplift would require a population growth rate more than double the national projected rate for Sheffield. This suggests significant levels of in-migration that could potentially create the need for some 3,500-3700 new jobs per year<sup>1</sup>.
19. However, this jobs growth rate is significantly higher than the optimistic policy-on/past trend forecast of 2,550 jobs per year which underpins the

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<sup>1</sup> The report uses the 2021 standard methodology figure which was slightly lower, at 2,923 dpa rather than 3,018.

Plan. This raises questions about whether the full standard methodology level of annual housing growth is deliverable and whether the homes would actually get built. Or if this level of development was realised, it could require a significant increase in out-commuting from Sheffield to jobs elsewhere, contrary to sustainability principles. It is also unclear where these additional jobs would be provided, given that Sheffield is the main economic centre in the sub-region.

20. The Council's jobs-led modelling work shows that policy-on/past trend employment growth of some 2,550 jobs per year would create a need for some 2,217 to 2,323 dpa. The report indicates that need could drop to 1,994 dpa if economic activity rates increase, albeit it is not clear how feasible or likely this change is. The main jobs-led dwelling forecast of 2,217 to 2,323 dpa is broadly comparable to the standard methodology 'baseline' local housing need figure for Sheffield of 2,236 net dpa, e.g. excluding the city uplift. The baseline figure is derived from local demographic and affordability factors in Sheffield.

#### *Conclusions on housing need/requirement*

21. In conclusion, having regard to the Council's demographic and economic modelling evidence, we concur with the Council that the full local housing need figure of 3,018 dpa does not represent an effective or justified strategy as there is significant doubt about the deliverability of this housing rate when considered against estimated jobs growth rates. As such, in the case of Sheffield, we consider there are exceptional circumstances to justify an annual housing requirement figure which is lower than the minimum local housing need derived using the standard methodology.
22. However, we are not persuaded that there are strong reasons to restrict the overall scale of the housing requirement to the urban-capacity based figure of 34,680 dwellings in the submitted Plan (2,040 dpa up to 2039). The Green Belt evidence indicates there are a number of weakly performing parcels and a significant number of moderately performing Green Belt parcels. The assessment criteria for purpose c are narrow and there is a lack of evidence to demonstrate that all sites should score well against purpose e. Other evidence does not show that all site options have fundamental constraints or would result in unsustainable patterns of development. As such there appears to be scope for some further Green Belt release without causing significant harm.
23. We recognise the importance which is attached in national policy to the retention of land in the Green Belt and the permanence of boundaries. However, meeting identified housing needs is also an important objective. The standard methodology 'baseline' figure of 2,236 dpa for Sheffield is based on specific evidence of demographics and housing need relating to

the local authority area. It represents minimum need without the policy-on city uplift and would support the anticipated growth of the local economy.

24. Additional supply would also help to facilitate a range of house types and sizes to meet the needs of different groups in the community. It may also result in additional housing in different parts of the local authority area such as the Principal Towns, albeit the distribution would need to be determined having regard to site suitability/deliverability and other factors as well as the spatial strategy in Policy SP2. Additional supply would also result in more affordable housing. This is a notable benefit given the high level of identified affordable housing need in the Local Housing Need Assessment (2024).
25. In conclusion, given high levels of housing need and in the absence of significant constraints relating to site SS17, we consider that its release from the Green Belt is justified and that exceptional circumstances are demonstrated. However, we consider that the Council's strategy to locate development in built up areas and on sustainably located brownfield sites in the Green Belt sites does not strike the right balance or represent positive planning. **We are of the view that, in the case of Sheffield, the standard methodology baseline housing need figure of 2,236 dpa represents a justified and reasonable housing requirement which should be reflected in the Plan. This equates to 38,012 dwellings over the Plan period 2022 to 2039.** There do not appear to be strong reasons to set a lower requirement linked to the application of policies to protect the Green Belt or other areas of importance, and it has not been shown that adverse impacts of this requirement would significantly and demonstrably outweigh the benefits.

### **Housing supply**

26. The Council's updated supply evidence dated December 2024<sup>2</sup> (EXAM 116 and EXAM 117) shows that there would be a shortfall in supply against a higher requirement of 2,236 dpa (38,012 dwellings). This would amount to some 3,539 dwellings over the Plan period up to 2038/39. It takes account of discussions at the site-specific hearing sessions during which the Council agreed that a number of capacity changes and site deletions should be taken forward.
27. The windfall allowances used in the Council's calculations represent a significant proportion of supply. However, we consider there is compelling evidence justifying the allowances, linked to high rates of historical completions, the range of on-going opportunities offered by the extensive

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<sup>2</sup> The housing supply figures include supply from allocation sites SS01 and ES25. However, these sites are subject to further on-going work and the Inspectors have yet to conclude whether they are suitable and justified.

urban area, and the existence of allocation sites which it was agreed at the hearings should be deleted (as set out in EXAM 115) but may provide potential scope for windfall supply in the future.

28. Some windfall may come forward in the areas referred to as 'Broad Locations for Growth' in Policy H1 and which are identified in the Topic Note (EXAM 87). However, there is insufficient evidence on availability and deliverability of sites in these areas to be clear about the scope for this. There is also an absence of information on the scale and type of uses and development parameters. As such the areas do not justify the description of 'Broad Locations for Growth' as defined in the PPG on Housing and Economic Needs Assessment. Therefore, the supply category in Policy H1 should be amended to simply refer to 'large windfall allowance' and other references in the Plan to Broad Locations for Growth should be removed.
29. The updated supply evidence also shows that there would be less than five years supply of housing for the period 2025/26 to 2029/30 (4.3 years) when assessed against the submitted housing requirement figure of 2,040 dpa. If a 20% rather than a 5% buffer is applied in line with the latest Housing Delivery Test results (December 2024), the figure would be lower. It will be lower still once the higher rate of 2,236 dpa is applied to the calculation.
30. The Council's latest timeline for plan preparation, as discussed below, suggests that the plan could be adopted in June 2026. On this basis the five year supply period would be 2026/27 to 2030/31. The Council has not supplied workings for this period. However, our assessment of the annual totals in the December 2024 trajectory suggests that five year supply is unlikely to be achieved for this period using the higher housing requirement (applying either a 5% or 20% buffer).
31. The absence of five year supply is a fundamental issue that will need to be resolved in order for the Plan to be justified and consistent with national policy. One approach could involve identifying additional sites that are predicted to come forward within the five-year period.
32. A stepped housing requirement involving lower targets in the first part of the plan period, where justified, can also potentially facilitate delivery of five year supply. In the case of Sheffield there are a number of strategic housing allocation sites which are likely to be delivered later in the Plan period, due to complexities in bringing forward regeneration sites and the need to phase funding opportunities and activities. However, the PPG on Housing Supply specifies that if stepped requirements are applied there is a need to ensure that planned housing requirements are fully met within the Plan period. As outlined above, in the case of Sheffield there is an identified shortfall against the higher housing requirement.

33. It is clear that the submitted plan has a number of shortcomings in relation to housing supply. Given the higher level of identified housing need and the scale of shortfall, we are not persuaded that the Plan can be found sound in its current form.
34. All of this points to the need for the Council to undertake further work on housing delivery. One option could involve exploring whether there are opportunities to allocate further sites, potentially of varying sizes, or identify broad locations for growth. As a first step this would involve looking at additional capacity in built-up areas. However, the evidence before us, including the extent of unmet need and the Council's Green Belt and site appraisal work discussed above, suggests that exceptional circumstances could exist in principle to warrant the release of some further Green Belt land for housing (in addition to SS17) in line with paragraph 140 in the NPPF. Or the Council may look to discuss unmet needs with other nearby local authorities.
35. As part of any site options work the Council may need to review its urban capacity work, Green Belt evidence and Sustainability Appraisal (SA) work and re-appraise site options in terms of suitability and deliverability. Given the similar scores and shortcomings relating to Green Belt purposes c and e, as outlined above, it is our view that any Green Belt work should give greater recognition to purposes a and b and revisit the overall scores to ensure they are fair. Although the plan is being examined under transitional arrangements, the Council might also wish to 'future proof' its Green Belt evidence by identifying and appraising land which is defined as Grey Belt under the NPPF 2024.
36. As identified above, the site assessment/SA work would be extensive as the Council has not to date undertaken full appraisal work on small greenfield options in the Green Belt as these were not seen as a reasonable alternative. If the Council proposes further housing allocation sites on Green Belt land, exceptional circumstances for the release of Green Belt would need to be demonstrated on a site-specific basis. There may also be a need to update other aspects of the evidence base, such as transport modelling and infrastructure work.
37. The option of delivering potential additional housing sites on greenfield sites in the Green Belt would represent a significant departure from the spatial strategy which has informed site option work to date. However, the spatial strategy as expressed in the plan in Policy SP2 states that the 'majority' of future growth will be on previously developed land within existing urban areas. Given the significant level of identified urban capacity there is nothing before us to suggest that the 'majority' requirement as expressed in the policy would not be met, even if additional sites are provided in the Green Belt to resolve the housing issues identified above.



## **Employment need/requirement**

38. Policy SP1 in the Plan sets out a requirement for 12.9 hectares of employment land per annum, which includes 2.9 hectares for offices and 10 hectares of industrial development.
39. At the hearings the Council confirmed the total requirement figure in the Plan is an error and should read 12.8 hectares (comprising 217.6 hectares over the Plan period). They also proposed that the figure should be broken down in terms of 'general employment land' (including offices, general industry and warehousing) and 'large scale logistics' (over 100,000 square feet or 9,000 square metres floorspace) to reflect the Council's employment evidence. The requirement for general employment land would be 11.5 hectares per annum (195.5 hectares total) and the requirement for large scale logistics would be 1.3 hectares per annum (22.1 hectares total).
40. Despite national economic uncertainties, the employment land market in Sheffield is active and there is particular evidence of advanced manufacturing, education, healthcare, professional and business growth in the city. The general employment requirement of 195.5 hectares over the plan period (11.5 hectares per annum) is based on a range of employment land projections for Sheffield set out in the Employment Land Review (ELR) Update 2021 (EM06). This includes a margin of flexibility and a replacement allowance for losses of employment uses.
41. Although we have recommended a higher housing requirement, the employment land requirement figure of 195.5 hectares is still justified. It is closely aligned to policy-on jobs growth and past take-up rates projections in the ELR Update and the evidence before us indicates that a labour supply forecast based on 2,236 dpa would be aligned to anticipated jobs growth rates.
42. The ELR Update also takes account of demand-based factors including the key growth drivers, such as advanced manufacturing and office-based sectors, and changing work practices resulting from the Covid 19 pandemic. We are satisfied that proportionate and up-to-date evidence has been provided to justify the general employment need figure of 195.5 hectares over the Plan period.
43. The Sheffield Logistics Study (SLS) 2022 (EM30) identifies a large scale logistics requirement of 62.6 hectares (3.68 hectare per annum). This is based on property take up of large scale logistics buildings in Sheffield (absorption trend methodology) and a replacement allowance for recycling of existing sites for logistics uses.

44. There is a need to attach some caution in relation to the Council's logistics need figure. It is generally recognised that the need for large scale logistics has a larger than local property market area that extends beyond the boundaries of a local authority and as such the need is often better evidenced through looking at opportunities for joint working on a sub-regional basis. (Joint Regional Statement of Common Ground May 2023 Paragraph 4.3.16 (EXAM4C)).
45. The SLS includes some assessment of supply and requirements within the Core Property Market Area and the wider Property Market Area (PMA). However, it is a Sheffield based study and not a comprehensive sub-regional or regional study. The ELR Update (paragraph 2.16) and SLS advise that the Council should look to participate in a further sub-regional study to quantify the need across the wider sub-region. Furthermore, the SLS (paragraph 8.19) concludes that there is sufficient supply of logistics sites to meet the forecast needs looking at the wider sub-region overall. The Council acknowledge that the Plan intends to make a meaningful contribution towards Sheffield's large scale logistics needs and those within the Wider PMA, on this basis.
46. Policy SP1 b) of the Plan seeks to make provision for only 22.1 hectares, rather than 62.6 hectares, due to these uncertainties. The figure of 22.1 hectares is based on an assessment in the SLS of the potential capacity that may be suitable for large scale logistics on employment allocations and employment sites with permission in the Sheffield City area. The updated logistics supply evidence in October 2024 (EXAM 104) shows an improvement in the supply with a minimum potential capacity of 41.7 hectares now available to meet the needs for large scale logistics over the Plan period.
47. Therefore, weighing up all factors, we consider that a need to deliver 62.6 hectares cannot be justified based on the evidence and uncertainties. However, in the context of the latest supply evidence, seeking to deliver only 22.1 hectares of land for large scale logistics is not reasonable or sound. As such, we consider that the Plan should be amended to show a requirement for 41.7 hectares (2.45 hectares per annum) for large scale logistics uses, to reflect the latest supply evidence and ensure the plan is justified and effective. At the same time, the need for large scale logistics land should be revisited through an early review of the Local Plan to allow the Council to explore opportunities for carrying out further assessment of the supply and requirements for large scale logistics over a wider area in the sub-region.
48. Accordingly, taking into account all of the evidence, we conclude that Policy SP1 should be amended to specify provision of 13.95 hectares per annum of employment land (237.2 hectares over the Plan period), comprising 11.5

hectares for general employment (195.5 hectares total) and 2.45 hectares per annum for large scale logistics (41.7 hectares total). The policy should also be amended to specify the need for an early Plan review relating to large scale logistics.

### **Employment supply**

49. The Council's updated supply evidence dated October 2024 (EXAM56a) shows an overall employment supply of 184.4 hectares. As such there would be a shortfall in supply amounting to some 52.8 hectares, against the higher employment requirement of 237.2 hectares over the Plan period up to 2038/39. This takes account of discussions at the site-specific hearing sessions where the Council agreed that a number of capacity changes and site deletions should be taken forward. The supply evidence (EXAM 104) shows there is an adequate supply of land to meet the amended requirement of 41.7 hectares for large scale logistics uses. Thus, the shortfall in the supply relates entirely to the need to provide 195.5 hectares of land for general employment uses over the Plan period.
50. It is recognised that there will be opportunities to protect, intensify and enhance the supply through the employment sites and policies in the Plan. The employment policies support the development of the key sites in the Advanced Manufacturing Innovation District (Policy EC1), new office provision in and around new City Centre Office zones (Policy EC2) and the retention and intensification of the existing employment areas/zones in Sheffield (Policies EC3 and EC4).
51. In addition to new employment allocations in the Plan and sites with permission and completions, there is a large overall total stock of office floorspace, general/light industrial as well as storage and distribution floorspace available in Sheffield (ELR Update (EM06) Table 5.4). As such there are a good range and choice of sites that would be available in the short to medium term to serve the demand for office, industrial and warehouse storage and distribution floorspace.
52. However, the scale of the shortfall is sizable. Additional general employment sites would aid market choice and flexibility and provide a positively prepared strategy. It would also provide greater certainty for local businesses and help to ensure investment is planned and coordinated.
53. The Council is therefore requested to look again at opportunities to provide additional employment land to meet this shortfall. This could include looking at the scope for intensification/reuse of existing employment sites, as this source is not included in the current supply workings, plus revisiting the Council's urban capacity work.

54. Furthermore, as discussed above, the Council's Green Belt evidence indicates that some sites in the Green Belt do not score well against Green Belt purposes. In this context there may be scope to explore options for delivering employment sites outside the urban area. As with housing, any site work would require a review of urban capacity work, Green Belt evidence and Sustainability Appraisal work and involve reappraising site options in terms of suitability and deliverability.
55. Therefore, in conclusion, the Council should carry out further work and explore all options to deliver the shortfall of 52.8 hectares of land identified for general employment over the Plan period. In assessing the options, the Council should give due weight to the benefits of meeting identified needs, balanced against any harm. If it is not possible to deliver the full shortfall, the Council would be expected to provide full and detailed reasoning, which clearly demonstrates that harm significantly and demonstrably outweighs the benefits of meeting identified needs.

### **Plan period**

56. Paragraph 22 in the NPPF states that strategic policies should cover a minimum 15 year period from adoption of the Plan. The Sheffield Plan period runs up to 2038/2039. The Council's submitted Local Development Scheme (CD21) identifies an adoption date of December 2024 but this has been updated to October 2025 in the latest version (EXAM 62). The Council has recently produced an indicative timeline which takes account of potential further work to identify additional sites and suggests an estimated later adoption date of June 2026. Based on adoption in June 2026, the Plan would look forward some 13 years.
57. The adoption date of the Plan has partly slipped due to delays during the early part of the examination. This has included the Council producing/providing necessary further evidence and the need for extensive hearing sessions. Extending the Plan period to cover 15 years could mean a larger shortfall in housing, further to that identified above. The implications for employment land need/supply would also need to be explored. The Council's evidence is based on the current plan period and would need to be reviewed to ensure it is up to date. Work to identify additional sites, update evidence, carry out consultation and hold any necessary hearing sessions could create further delays in adoption.
58. The Sheffield Plan examination has already been protracted. The current Core Strategy dates from 2009 and there is a high level of identified housing need, as identified above. As such there would be distinct benefits to be gained from earlier adoption linked to earlier delivery of housing/employment and provision of an up to date framework to guide development. The Council and Homes England have also indicated that

earlier adoption of the Plan is desirable as the allocated status of a development site can aid funding applications.

59. Therefore, in the case of Sheffield we conclude that proceeding with a post-adoption plan period which is less than 15 years is a pragmatic and reasonable approach. Accordingly, we conclude that the Plan's timescale is appropriate and justified.

### **Timeline for further work and next steps**

60. At the close of the hearings we asked the Council to provide a GANTT chart setting out estimated timings for carrying out additional work if further housing and employment sites were required. The draft GANTT chart (19 December 2024) takes account of work to identify site options and update the evidence base. It factors in Committee decisions, public holidays and consultation stages and covers each stage of the examination process leading to adoption.
61. The draft GANTT chart shows that the further work, consultation and hearings on sites would be completed within 8 months. It also shows that the plan adoption date would be delayed to June 2026, e.g. with a delay of 8 months compared to the programme in EXAM 62.
62. The Government published a written ministerial statement on 30 July 2024 along with a letter to the Chief Executive of the Planning Inspectorate. The letter outlines the Government's desire to avoid lengthy delays to examinations. It sets out that pragmatism should only be used by Inspectors where it is likely a plan is capable of being found sound with limited additional work to address soundness issues. Any pauses to undertake additional work should usually take no more than six months overall. Pragmatism should not be used to address fundamental issues with the soundness of a plan, which would be likely to require pausing or delaying the examination process for more than 6 months overall. It also states that 'any extensions to the 6 month pause should only be allowed at Inspector's discretion to deliver adopted local plans under the current system'.
63. This letter identifies a number of shortcomings and soundness issues with the draft Sheffield Plan relating to housing and employment land supply. We have outlined a number of options that could be taken to potentially address these matters and ensure the plan is positively prepared, justified and consistent with national policy. There are fundamental issues with the soundness of the plan and any housing and employment sites work could be extensive. The 8 month examination pause in the draft GANTT chart is also greater than the 6 month period referred to in the Minister's letter.

64. However, as outlined above, the Core Strategy dates from 2009 and high levels of housing and employment land need have been identified. There is also a need to provide a range of types and sizes of homes and in different locations. As such there are clear benefits to be gained from securing earlier plan adoption, in order to provide earlier delivery of growth and an up to date framework to guide applications. There are other considerable advantages here related to significant levels of regeneration activity in the city and ongoing/future investment plans. Homes England indicated at the hearing that Sheffield is one of their top current locations in England for partnership and funding work and that having allocation sites in an adopted local plan can aid funding applications. As such they stressed the need to attain an adopted plan soon. In addition, the examination is well advanced with the majority of the hearings sessions completed. The estimated pause of 8 months would also only be slightly longer than the 6 month period referred to in the Minister's letter.
65. Therefore, overall, having regard to the specific factors in this case and applying our discretion, we conclude that the Sheffield Plan examination process should be temporarily paused to allow further work on housing and employment land supply to be undertaken before hearings are resumed. During this period the Council will need to provide us with regular progress updates on the work.
66. At this point, the Council is requested to:
1. Reflect on our conclusions on housing and employment land supply in this letter and confirm that the Council is content for the examination to be temporarily paused to allow further work to be undertaken to rectify the identified problems.
  2. Confirm whether the draft GANTT chart from December 2024 is still up to date, or whether changes are needed. If the pause period is likely to be longer we may need to re-consider our position on pausing the examination. We recognise that the start date of the work period will be slightly later given the timing of this letter.
67. It would be appreciated if the Council could respond to this letter within 10 working days.
68. We are not seeking comments from other parties on the content of the letter at this stage. A copy of this letter should be placed on the examination website as soon as possible.

*Katie Child, David Troy and Rosie Morgan*

INSPECTORS