

Forward & Area Planning
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SENT BY EMAIL
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Dear Planning Policy Team,

THE SHEFFIELD PLAN: PROPOSED ADDITIONAL SITE ALLOCATIONS

1. Thank you for consulting with the Home Builders Federation (HBF) on the Proposed Additional Site Allocations as part of the Sheffield Plan Examination.
2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.
3. This response has been provided in order to assist the Council in the preparation of a sound plan, the HBF is keen to ensure that the Council produces a sound local plan which provides for the housing needs of the area.
4. The HBF has been involved in the production of the Sheffield from the outset, including attending the two stages of public hearings, and throughout our message has been consistent that the Council needs to increase the housing requirement and that there is a need to release land from the Green Belt to provide a sufficient and appropriate housing land supply. The HBF notes that this is a view now shared by the Planning Inspectors who have stated that the housing requirement should be increased to 38,012 new homes over the period 2022 to 2039 to meet the identified needs. The Inspectors have also highlighted that there is shortfall in housing land supply compared to the housing requirement, requiring land for an additional 3,539 dwellings to be found.
5. As set out in our response to the Additional Evidence consultation in December 2024, the HBF considers that the Council have already demonstrated that there are exceptional circumstances to justify changes to the Green Belt boundaries, in that they can not meet their housing needs without the release of Green Belt and that they are already releasing one site

from the Green Belt. The NPPF¹ states that before concluding exceptional circumstances exist to justify changes to Green Belt boundaries, the authority should be able to demonstrate that it has examined fully other reasonable options for meeting its identified need for development. The NPPF suggests that the strategy will be assessed to ensure that it makes as much use as possible of suitable brownfield sites and underutilised land; optimises the density of development, including a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and has been informed by discussions with neighbouring authorities as to whether they could accommodate some of the identified need for development. The HBF also considers that the Council has met all of the requirements set out in the NPPF to release land from the Green Belt.

6. The current consultation sets out the Council's own evidence which they also believe now shows that they have met the exceptional circumstances necessary to release Green Belt land. This includes the limited capacity for housing in the urban areas and that there are no agreements for Sheffield's housing land needs to be met elsewhere. The HBF considers that this evidence is appropriate and continues to consider that land should be released from the Green Belt.
7. Following these conclusions the Council proposes to release some greenfield land from the Green Belt for development. The Council suggests that the proposed site allocations provide for approximately 3,950 homes, which would be sufficient to meet the shortfall identified. The Council also suggests that this provides for flexibility in the supply.
8. The HBF agrees with the Council releasing some greenfield sites from the Green Belt, however, the HBF would suggest that this creates a very minimal level of flexibility in supply at less than 1 year of supply, and potentially only needs one or two sites to not come forward for the supply to be insufficient.
9. The Council are proposing to release fourteen additional site allocations to ensure sufficient land is identified through the Sheffield Plan to meet the need for new homes and employment over the period to 2039. 10 sites are proposed as Housing Sites and 3 sites are proposed as General Employment Sites. A further site is proposed as a Mixed Use Site (Housing and Employment).
10. The HBF does not wish to comment on the individual site allocations but considers that it is important that the Council is able to actually meet their own overall vision of providing good quality housing that meets the needs of different household types and sizes. The HBF considers that the sites to be released from the Green Belt should make a valuable contribution to meeting this vision. The Plan should provide for a wide range of deliverable and developable sites across the area in order to provide competition and choice to ensure that housing needs are met in full.

¹ NPPF Sept 2023 paragraph 141

11. The Council have highlighted that any planning applications on any site allocations that were formerly Green Belt land will be subject to the 'Golden Rules' that were introduced by the December 2024 NPPF. The Council set out that this would mean at least 50% of housing would need to be affordable, unless this would make the development of these sites unviable. It would also require necessary improvements to local or national infrastructure and the provision of new, or improvements to existing, green spaces that are accessible to the public.
12. The HBF notes that the Whole Plan Viability Assessment – Further Note (May 2025) highlights that all of the potential allocations are likely to be viable with 30% affordable housing, and that at 30% affordable housing even if there was a fall in house prices of 5% then the 30% would remain deliverable. It also suggests that for the two potential south west sites they are able to bear 40% affordable housing, and this remains with a 5% fall in house prices. However, the assessment does state that not all sites would be viable with 50% affordable housing, and that 40% is only possible in certain locations or with a particular tenure mix which does not include a focus on Social Rent housing.
13. The HBF considers that the Whole Plan Viability Assessment does not support the 50% affordable housing element of the Golden Rules, and the Council will need to set an alternative affordable housing requirement, based on the evidence they do have. This may mean that there are differing requirements in different locations, this may be in terms of tenure split, rather than proportion if the Council considers that is more appropriate. The HBF considers that this would be in line with the 2024 NPPF which states that a specific affordable housing requirement (or requirements) should be set for major development involving land which is proposed to be released from the Green Belt. It goes on to state that this requirement should be set at a higher level than land which is not within the Green Belt; and require that at least 50% of the housing to be affordable, unless this would make the development of these sites unviable. As is demonstrated in the Viability Assessment, the 50% requirement would not be viable.

Future Engagement

14. I trust that the Council will find these comments useful as it continues to progress its Local Plan to adoption. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
15. The HBF would like to participate in the examination sessions in relation to this matter. The HBF would also like to be kept informed of any further examination sessions, the publication of the Inspectors' Report, the adoption of the Plan and all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



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