

THE SHEFFIELD PLAN

Our City, Our Future

Issues and Options

Social Infrastructure Technical Note

September 2020



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1. Purpose of the background paper

- 1.1 When developing local plans, local planning authorities should undertake an assessment of social infrastructure to ensure the Plan will meet the needs of all of the city's residents.
- 1.2 This Technical Note supports the Sheffield Plan Issues and Options consultation September 2020 and sets out how we will be assessing health and education requirements that will arise from the levels of development set out in the Plan.
- 1.3 Aim 1 in the Issues and Options is for a fair, inclusive and healthy city. Some neighbourhoods suffer from poorer health and fewer life opportunities. This is in part caused by a lack of access to social infrastructure – this situation needs to be addressed in the Plan if the city is to become a fairer place to live.
- 1.4 This Note identifies the evidence that will be needed to ensure we effectively plan for health and well-being and sets out how the aims of the Plan relating to social infrastructure will be delivered. It sets out the justification for the proposed mechanisms to be used to forecast the need for social infrastructure arising from the development levels and types to be proposed in the Plan. It then shows how the Plan will ensure that the right infrastructure is provided to meet these needs, of the right type and quality at the right time and in the right places.



2. Summary of evidence

National Planning Policy Framework (NPPF)

- 2.1 The NPPF published in February 2019,¹ in paragraph 8 states that there are three overarching objectives to sustainable development. The social objective requires accessible services to support communities' health and social well-being. Paragraph 20 requires strategic policies to make sufficient provision for community facilities such as health and education. In order to do this, authorities will need to collaborate with infrastructure providers (paragraph 25).
- 2.2 Chapter 8 on promoting healthy communities emphasises the need to take a proactive approach and plan positively for health (paragraph 92) and, particularly schools (paragraph 94).

National Planning Practice Guidance (PPG) and Non-Statutory Guidance

Plan-making PPG

- 2.3 Updated Practice Guidance on Plan-making was published in July 2020.² It encourages strategic policy-making authorities to work with public health leads and health organisations to understand and take account of the current and projected health status and needs of the local population. This should include the quality and quantity of, and accessibility to, healthcare and the effect any planned growth may have on this (Paragraph: 046 Reference ID: 61-046-20190315).

Healthy and Safe Communities PPG

- 2.4 This PPG was updated in November 2019.³ It recognises that the needs for healthcare, including primary, secondary and tertiary, are ever-changing and this presents a challenge for plan makers.
- 2.5 It recommends close working between plan-makers and health organisations in order to rise to these challenges and ensure the right health infrastructure is provided. It recommends that the first point of contact on population health and wellbeing issues, including health inequalities, is the Director of Public Health for the local authority. It also recommends collaboration with the Health and Wellbeing Boards (who produce a Joint Strategic Needs

1

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

2 <https://www.gov.uk/guidance/plan-making#evidence-base>

3 <https://www.gov.uk/guidance/health-and-wellbeing>



Assessment), NHS England and local Clinical Commissioning Groups (CCGs), who are both statutory consultees for local plans and were contacted in 2020 as part of the local plan process. Both of these organisations were contacted in July 2020 and invited to take part in the development of the Sheffield Plan. A copy of the invitation letter is attached to this note at Appendix 1. Officers from the Council's Local Plan team also attend meetings of the NHS Sheffield Strategic Estates Group. The guidance also recommends close working with Sustainability and Transformation Partnerships (Paragraph: 002 Reference ID:53-002-20190722).

- 2.6 As part of engagement with the above bodies, local planning authorities need to consider what health facilities could be funded through Community Infrastructure Levy (CIL) (Paragraph: 005 Reference ID:53-005-20190722).
- 2.7 The PPG also talks about the importance of providing sufficient school places for the creation of healthy places. It specifically refers to separate guidance produced by the Department for Education, 'Securing developer contributions for education' that sets out how to estimate pupil numbers from new housing and secure contributions for the creation of additional school places. This should cover all education phases (age 0-19 years and special educational needs) over the plan period. (Paragraph: 007 Reference ID:53-007-20190722). More detail on this guidance is set out below.
- 2.8 As well as emphasising that plans should seek to meet demand for school places arising from the development needs of their area, the PPG also recommends that they allocate sufficient suitable land for schools to meet the need anticipated over the plan period. Plan-makers will need to work with developers to coordinate the phasing and delivery of housing growth with the delivery of new school places to ensure that sufficient school capacity is available at the right time. The total amount of land required for education use should be determined with regard to the Department for Education space standards.⁴ Master-planning of large developments with multiple developers can help to inform decisions about the appropriate scale and siting of new or expanded schools. If additional land is required for education, it should be allocated for that use and its viability assessed by excluding alternative uses for the purposes of land valuation (Paragraph: 008 Reference ID:53-008-20190722).

Securing developer contributions for education

- 2.9 This non-statutory guidance was published by the Department for Education in November 2019.⁵ It was produced to help local authorities secure developer

⁴ <https://www.gov.uk/government/publications/area-guidelines-and-net-capacity>

⁵ <https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth>
and



contributions for education so that housing developers contribute to the cost of providing the new school places required due to housing growth. The guidance promotes good practice on pupil yield evidence and should be followed when determining the requirements for pupil places that will be derived from the levels of development proposed in the Sheffield Plan. It will inform the determination of requirements from individual developer contributions.

- 2.10 While the guidance is aimed at local education authorities to help determine contributions from individual developments it refers to the need to ensure that the requirements are based on viability, and assessed at the plan-making stage.
- 2.11 It also recognises that there are several potential funding sources for schools (paragraphs 6 and 7) and that there needs to be a coordinated approach to determining delivery mechanisms. There will need to be a robust and transparent mechanism for assessing pupil yields from new development to accurately measure the need generated. There will also be a need to plan specifically for the different age groups and types of educational requirements, such as special educational needs (SEN). It also recommends that needs area assessed over at least a ten year period.

Other Plans and Strategies

- 2.12 A number of plans relating to health have been produced by several health organisations, and these will also be taken account of in the process of determining health infrastructure needs. For example:
- Director of Public Health Reports for Sheffield 2016, 2017, 2018 (including Joint Strategic Needs Assessment)
 - Sheffield Citywide NHS Strategic Estates Strategy (2017 to 2020)
 - Sheffield NHS Primary Care Strategy 2016
 - Sheffield Joint Health and Wellbeing Strategy 2019-24

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/909908/Developer_Contributions_Guidance_update_Nov2019.pdf



3. Our approach

- 3.1 The NPPF in paragraph 34 expects development contributions towards education and health infrastructure, and plans should set out the contributions expected from development. The Issues and Options document September 2020 in Chapter 4 sets out how the Sheffield Plan will be implemented and, in the case of infrastructure delivery, this will be through a number of mechanisms. Pages 66 to 70 of the Issues and Options set these out in more detail, and the paragraphs below explain what this will mean for social infrastructure specifically.
- 3.2 In preparing the Sheffield Plan and in assessing major applications with Development Management, we will work with Clinical Commissioning Groups (CCGs) and other NHS and health organisations to identify and address local health care needs. This will reflect NHS Forward Planning documents and related commissioning and estate strategies, Joint Strategic Needs Assessments and Health and Wellbeing Strategies. Where appropriate, the Plan will identify sites for future provision of schools and health facilities, particularly in areas with significant growth and/or under provision. Where possible, better use will be made of existing and proposed new infrastructure through co-location of services. Any new facilities will be easily accessible by public transport, cycling and walking.
- 3.3 The Issues and Options document states that all 3 of the main Options for the levels and distribution of housing will require significant new infrastructure. It also recognises that there are some areas where infrastructure provision is already stretched, even before new development takes place.

Mechanisms to deliver social infrastructure

Infrastructure Delivery Plan (IDP)

- 3.4 Pages 66 and 67 of the Issues and Options refer to the need to promote sustainable development through the delivery of infrastructure in a coordinated way. It states that we will deliver an Infrastructure Delivery Plan (IDP) that will help achieve this and that the consultation provides an opportunity to gather the evidence to help develop the IDP.
- 3.5 The IDP will identify existing infrastructure, infrastructure already planned and for future needs. It will set out what is needed and quantify this need. It will identify where it is needed and when, and how the new or improved infrastructure will be funded.



Community Infrastructure Levy (CIL) and CIL and Planning Obligations Supplementary Planning Document (SPD)

- 3.6 Sheffield has been a Charging Authority for a Community Infrastructure Levy (CIL) since 2015⁶ and it is anticipated that we will continue to charge a CIL in order to contribute to the delivery of the infrastructure that will be required to support the development ambitions of the Sheffield Plan. The CIL is currently supported by a Supplementary Planning Document (SPD)⁷ that sets out how CIL operates in tandem with other specific developer contributions (such as through S.106) that may still be required.

Infrastructure List / Infrastructure Funding Statement (IFS)

- 3.7 The CIL Regulations require CIL charging authorities such as Sheffield to publish online an infrastructure funding statement (IFS) by 31 December 2020 and by the 31 December each year thereafter, to cover the previous financial year (see CIL Planning Practice Guidance, Paragraph: 175 Reference ID: 25-175-20190901). The IFS must set out a report on the infrastructure projects or types of infrastructure that the authority intends to fund wholly or partly by the levy. This is known as the Infrastructure List. It will detail infrastructure projects where a decision has been made by the local authority to commit funds to a particular item of infrastructure or project (Paragraph: 176 Reference ID: 25-176-20190901). It will include all projects to be, or intended to be, funded at least partly by CIL and must relate to the IDP. It must be agreed and published by the end of 2020, so it will be necessary to take account of the emerging Sheffield Plan infrastructure requirements when compiling this List.

Other developer contributions (particularly Section 106)

- 3.8 Developer contributions, particularly through S.106 legal agreements, will be required where the impacts of a development will necessitate the developer to provide mitigation in order for it to be granted planning permission.
- 3.9 The approach in the existing SPD is that many of the financial contributions from development that will be required to provide for new and improved education and health facilities will be through CIL. However, there may be circumstances where a S.106 is required, for example where a major residential development is proposed, and subsequently the capacity of a local school will have to be increased, either through an extension or the commissioning of a new school, within the local area. If there are insufficient funds available from other sources to provide this (including CIL), and a contribution is justified that will meet the requirements of the 3 tests in the NPPF and CIL Regulations. Since the SPD was published, the CIL has been

⁶ <https://www.sheffield.gov.uk/cil>

⁷ <https://www.sheffield.gov.uk/content/sheffield/home/planning-development/approved-planning-guidance.html>



revised to encourage the use of both CIL and S.106 to deliver individual items of infrastructure, rather than using one or the other. This has increased the scope for the use of S.106.

- 3.10 The current SPD covers school places provision in Guideline GE1 Provision of New School Infrastructure, that states: *“School Infrastructure Provision, within the Local Area will be required where it is necessary to make Major Residential Developments sustainable”*. It determines that this approach will apply to residential developments of 500 dwellings or more. It is likely that a similar approach will be adopted in the Sheffield Plan, although the ‘threshold’ at which this will apply will have to be determined as the Plan is drafted and infrastructure requirements become clearer. The scale of contributions will also have to be determined, but it is possible that the calculations in Guideline GE2 of the current SPD could be used as a starting point, but only in tandem with the recommendations of the DfE guidance (see below).
- 3.11 A similar approach is used for health facilities – GHF1 sets out the scale of development that would be expected to make a separate contribution. Guideline GCF2 also has the same approach for new community facilities (that includes local shops, meeting places, sports venues, cultural buildings, public houses, places of worship and other local services to enhance the sustainability of communities and residential environments such as; community centres, youth clubs, libraries, information and advice centres, lecture theatres, drop in centres, crèches and nurseries, training centres and toilets).

Securing developer contributions for education

- 3.12 This guidance has been summarised earlier and advice contained in it will be used to determine the levels of developer contributions required. In particular, the advice in the ‘Mechanisms for securing developer contributions’ section (paragraph 3) is particularly appropriate:

It is important that the impacts of development are adequately mitigated, requiring an understanding of:

- The education needs arising from development, based on an up-to-date pupil yield factor.
 - The capacity of existing schools that will serve development, taking account of pupil migration across planning areas and local authority boundaries.
 - Available sources of funding to increase capacity where required.
 - The extent to which developer contributions are required and the degree of certainty that these will be secured at the appropriate time.
- 3.13 This guidance has been described in detail earlier, but it will be the most important element in determining educational requirements and the level of contribution required.



- 3.14 The guidance suggests (paragraph 15) that the costs of providing new and expanded schools should be derived from the local authority school places scorecards 2019 underlying data. This includes details of over 2,000 school construction projects, the number of school places provided and the costs of provision. These can be analysed to enable estimates of the level of financial contribution that will be required to deliver educational infrastructure that will meet the needs arising from new development. This information can be used in the same way that the cost information in the current SPD is used. This approach will be taken up in the IDP and any new SPD required to support the Sheffield Plan.
- 3.15 There may also be a need to safeguard land for schools (paragraphs 22 to 26) and the Sheffield Plan will do this through allocations where necessary. This will be particularly necessary if the Plan were to promote significant new settlements (paragraph 27 onwards).

Summary

- 3.16 Page 69 of the Issues and Options document sets out the information we will require from infrastructure providers in order to deliver on the approach to implement the Plan set out above.
- 3.17 New housing development will continue to be monitored as part of the Housing and Economic Land Availability Assessment (HELAA), so that the changes in population can be factored into planning the future capacity of educational facilities. Education infrastructure requirements could be the expansion of existing schools or the provision of new facilities and may require additional Early Years, Primary School, Secondary School, Post-16 provision and SEN.
- 3.18 A larger population will also create the need to increase primary health care provision (such as GP surgeries). New, purpose built GP practices are likely to be needed as Sheffield has a particularly high number of practices operating from converted Victorian houses that are expensive to maintain and difficult to access. There is also a greater emphasis on care in the community and preventative care. An ageing population and increasing student population present different challenges and we need to make sure that we plan for everyone.
- 3.19 The impact of the Covid-19 pandemic will also present its own challenges that will need be accounted for during the preparation of the Plan. It will have far-reaching effects that will be difficult to predict, but it will affect the availability of public funding for infrastructure, impact on the level and type of need for new health and education facilities and their design and impact on the viability of new development and its capacity to fund new infrastructure.



3.20 We are also monitoring the progress of the White Paper, 'Planning for the Future', that proposes radical reforms to the planning system, including the abolition of CIL and S.106.



4. Discounted options and approaches

- 4.1 The requirements of the NPPF, guidance in PPG and other policies and strategies, appear to set a strong case for the approach set out in this Note.
- 4.2 The need to plan for social infrastructure provision is, therefore, relatively undisputed. The methodologies and techniques for doing this are also generally well-established, tried and tested. We would therefore suggest that there are few appropriate alternative approaches to those suggested in both the Issues and Options consultation document and in this paper.
- 4.3 One alternative approach would have analysed the requirements for future social infrastructure more in advance of the Issues and Options stage to identify the needs for social and other infrastructure early in the process. However, this analysis is more suited to the later stages of the Plan preparation to:
 - prevent raising expectations of delivery in the absence of more detailed information on the exact scale and location of future development;
 - avoid unnecessary work relating to any options not pursued, making best use of limited resources to undertake the work at this stage; and
 - prevent much of the work becoming out-of-date as the Plan progresses.



5. Conclusions – preferred approaches

- 5.1 For the reasons set out in the previous chapter, the preferred approach is to closely follow the requirements and advice of national planning policy and guidance to produce an assessment of social infrastructure needs once the preferred options within the Sheffield Plan have been agreed, and prior to incorporation into a full draft Plan.



Appendix 1: Consultation Letter to Health Bodies

The following is a copy of a letter sent in July 2020 to statutory consultees for health infrastructure:

Dear NHS Sheffield Clinical Commissioning Group
Dear NHS England

As part of the duty to cooperate, we are contacting you with a view to arranging a meeting to discuss the matters that the new Sheffield Local Plan should address. In particular, issues relating to health services and facilities provision and policies to promote a healthy city. This is in advance of our forthcoming public consultation on '**Issues and Options**' – due to run from July-October 2020. The Issues and Options document is being produced to comply with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

The Issues and Options document will highlight the main challenges and opportunities for Sheffield over the next 15-20 years. It will also set out the main spatial options for accommodating future growth, especially in relation to housing. We published a similar document in November 2015, the 'Citywide Options for Growth to 2034' (also under Regulation 18) and were working towards publishing a full Draft Local Plan with site allocation options (again, under Regulation 18) in 2018. However, in summer 2018, Members raised concerns about the amount of Green Belt land that might need to be released and asked officers to look again at other options. We have now largely completed that work, hence the need to consult again on the spatial options.

In order to provide some further background and context for our meeting, I have also attached:

- **a list of plans and strategies** that we have used to help us identify the challenges and opportunities in the Issues and Options document and to inform the Sustainability Appraisal Baseline and Scoping Report
- **a provisional list of the Local Plan policies** – this also outlines the scope of each policy and indicates how they relate to the NPPF

We are also able to share **drafts of a number of the development management policies** that could be included in the Publication Draft Local Plan. Although the Publication Draft Plan is not due to be published until summer 2021, we thought it would be useful to have early dialogue with yourselves so we have plenty of time to agree the wording. The specific health-related policies that it would be useful to focus on can be agreed in advance of the meeting and copies of these policies sent to you in plenty of time to allow you to study them prior to the meeting.

Suggested Meeting Agenda

We suggest the agenda for our meeting would therefore be:

1. Matters the Plan should address
 - (a) Thematic key issues that are likely to be current international, national, regional priorities for your organisation



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(b) Specific spatial issues for different areas of Sheffield where those exist

2. Plans and strategies that the Local Plan should take into account – have we missed any?
3. Discussion on the scope and content of the policies - to ensure that the new Local Plan deals effectively with the issues with which you are most concerned
4. Draft development management policies - agree timescales for more detailed discussions on their wording

Given the current constraints on travel and meetings we envisage that any meeting with yourselves will, of course, be by phone or over video call. We will get in touch with you in the next 1-2 weeks to make arrangements for that call.

