

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** 33268 - Hague Farming Ltd Representations  
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**Attachments:** [image011.png](#)  
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[image013.png](#)  
[image014.jpg](#)  
[image015.png](#)  
[32268.A3.Hague Ltd Reprs FINAL.230220.pdf](#)

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Dear Sir/Madam,  
Please accept the attached as a submission of written representations to the Draft Sheffield Local Plan on behalf of Hague Farming Ltd.  
Our Client wishes to participate in the hearing session(s) when they occur.  
Regards,

**Maeve Whelan**  
Graduate Planner



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Sheffield City Council,  
111 Town Hall,  
Pinstone Street,  
Sheffield,  
S1 2HH

32268/A3/MW  
February 2023

Dear Sir/Madam

**REPRESENTATIONS TO THE DRAFT SHEFFIELD LOCAL PLAN**

These representations have been prepared by Barton Willmore, now Stantec on behalf of Hague Farming Ltd (here in referred to as the "Client").

Our Client has a number of key concerns over policies included within the Draft Sheffield Local Plan (herein referred to as "the Local Plan") which is currently subject to public consultation until 20<sup>th</sup> February 2023). Our Client is keen to ensure that the Council meets the aspirations for housing and economic growth through the allocation of sufficient and suitable sites through the Local Plan Process.

Our Client controls land at Long Lane, Loxley and Cockshutts Lane, Oughtibridge. Therefore, they have a particular keen interest in ensuring the sustainable development of this area (Outer Northwest Sub-Area).

The NPPF states that in order for a Local Plan to be Considered 'sound' it must be:

- a) *Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs 21 ; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- b) *Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

- c) *Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
- d) *Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.*

The remainder of this letter will set out our Clients representations to the Local Plan update, outlining where our Client believes the Plan does not meet the above criteria, and therefore is considered to be unsound.

### **Policy SP1: Overall Growth Plan**

This Policy states the Plan will deliver **35,530** homes by 2039 (**2,090 homes per annum** from 2022 to 2039) through 297 housing allocations and 19 mixed use developments, primarily within the 'Central Sub-Area' and within 'Broad Locations for Growth'.

The Governments Standard Method provides a minimum figure for the number of homes required within a local authority. In 2020 a 35% uplift was introduced to be applied to the SM figure for the 20 largest towns and cities in England, including Sheffield. Sheffield's base figure is uplifted from **2,236 (38,012 total over plan period) to 3,018** homes per annum.

If this figure is applied to the 17 years of the plan period (2022-2039), it equates to **51,306** dwellings over the plan period (3,018 x 17). This results therefore, in a short falling of **15,776** dwellings (51,306 - 35,530) from the SM figure.

It was decided by Cooperative executive in February 2022 to reduce the housing figure in Sheffield, order to avoid Green Belt development.

Our Client strongly objects to this significant reduction in housing provision, and argues that by so severely limiting the target figure, the plan is unsound. The PPG states that SM is not mandatory if circumstances warrant a different approach. The reduction in the SM in the draft plan however is unjustified.

The Council have argued that the reduction is acceptable due to research by Icenl which showed the standard method could be reduced to the level included in the draft Plan because job growth is not to rise to a level above the standard method. Our Client however, does not consider this an appropriate enough reason to reduce the housing figure and instead argues the reduction is a means for the Council to avoid Green Belt release.

Additionally, reducing the SM figure is unjustified as it does not consider the option for Green Belt release in order to meet the SM target. Our Client argues that the choice to avoid Green Belt

development is the cause of the many small, tightly constrained allocations which for various reasons may be undeliverable.

The committee report from the 3<sup>rd</sup> November 2022 Extraordinary meeting of the Transport, Regeneration and Climate Policy Committee stated that several factors have determined the growth plan and spatial strategy. The report claims that almost all the land in the Green Belt continues to perform at least one of the purposes of the Green Belt, and releasing greenfield land in the Green Belt for development has a high risk of undermining efforts to reuse the substantial supply of brownfield sites in the urban area.

Our Client does not consider these reasons exceptional enough to justify the reduction in the level of homes.

Sheffield is one of a number of northern cities surrounded by Green Belt. In recent years Leeds, York, Bradford, Calderdale, Kirklees, Wakefield, Barnsley and Rotherham have all adopted plans with the need to amend Green Belt boundaries to meet their housing needs. Sheffield is not in exception to these cities and therefore, should not restrict the level of homes being adopted.

The reduction in the housing target to avoid Green Belt release, and the selection of allocations will result in a reduction in affordable housing provision and impacts on mix with high density schemes being predominantly one and two bedroom apartments.

Regarding the Icen research, the standard method is not based purely on meeting job need. Focussing on this one element of population growth is reductionistic and fails to consider the cities needs as a whole. Therefore, it is not considered there exist exceptional circumstances to reduce the housing target based on this research alone.

Our Client therefore, argues that in order to be considered sound, the Plan must consider Green Belt release. Failure to properly do so limits the housing target so significantly when there at present does not exist evidence of exceptional circumstances to do so.

### **Policy SP2: Spatial Strategy**

This Policy focuses future growth on previously developed land. Within the Central Sub-Area. This Policy states that 18,485 of the total housing number will be delivered in this area.

Our Client objects to this policy. It is their belief that focusing growth predominantly to these areas will limit the housing numbers provided and the types of property provided. Many of the sites selected as allocations do not lend themselves to the high number of homes that are proposed to be delivered.

Furthermore, many of the allocations fall within flood zones 2 or 3, or are on possibly contaminated land, or will lead to impact on heritage assets (see allocations SU03, LR01, SV11 and KN09).

## **Policy SA2: Northwest Sheffield Sub-Area**

As stated previously, our Client controls land in the Northwest Sub-Area in Loxley and Oughtbridge and therefore has a keen interest in ensuring the sustainable, appropriate development of the area. Our Client objects to the level of Homes in North west Sheffield. This sub-area includes part of the main urban area, large settlements, district centres and smaller villages. All of these existing areas have services and businesses that require growth to maintain viability, however the plan only aims to deliver 1,015 homes in the plan period, sixty per annum. For such a large part of the city, with a significant population, number of settlements and existing services, this level of development is significantly less than what is necessary.

The homes in this area are planned to be delivered through a series of housing allocations. Our Client objects to the sites chosen as these all rely on significantly high density development. The sites shown in Appendix 1 show a total of 1,275 homes to be delivered across 26.6 hectares of land at approximately 50 dwellings per hectare. Such high-density development is unlikely to deliver the Councils aspirations on housing type and mix.

It should be noted that 480 homes are delivered across two sites, NWS09 and NWS10 at a density of 67 dwellings per hectare. Removing these from the list results in all other sites being developed at a density of 40 dwellings per hectare, however many of these are significantly higher, including NWS11, 21 and 22 all broadly 150 dph. It is clear a broad range of homes are required, and in order to achieve this increased and/or alternative housing allocations are required.

## **Policy H1: Scale and Supply of Housing**

This Policy sets out that 85% of the total housing target is to be delivered through sites which already have planning permission, on identified allocations and in 'Broad Locations for Growth'.

The Plan defines Broad Locations for Growth as areas which are areas which are already transitioning (or have potential to transition) from employment uses to housing, sometimes with public sector support. The Plan also states that these sites have the potential to contribute 4,675 homes to the total housing target.

Significantly however, the Plan acknowledges that these sites cannot contribute to supply until after 2029, and that due to potential issues with land ownership, public intervention, possible need for decontamination and decommissioning as these areas transition from employment land, it is likely it will be much after 2029 when these sites come forward.

Our Client strongly objects to the inclusion of the potential 4,675 homes in the housing target. The potential for these sites to come forward is tenuous and given the already uncertainty on the delivery of the actual allocations, these dwellings should be allocated to more sustainable deliverable sites which can come forward during the Plan period.

## **Policy NC5: Creating Mixed Communities**

This Policy states that for developments of over 30 dwellings in the city centre, no more than half of the homes should be one-bed apartments and studios. Our Client objects to this policy and argues that stronger evidence is needed to show allocations of high numbers on small sites are able to achieve the high housing targets with this limitation on one bedroom apartments.

### **Summary**

In its current form, the Plan is not positively prepared or sound. Exceptional circumstances do not exist to justify the reduction of the housing figure below the standard method (even before the 35% uplift).

Though the development of utilised brownfield land is positive, clearly the Plan does not consider that by focusing solely on development on this land, it will severely limit the housing mix, delivery of affordable homes and delivery of the housing target. Similarly, the inclusion of Broad Locations is unsound. The future of these sites is uncertain and as such should be removed and reallocated to more sustainable and deliverable sites.

Focussing development on brownfield sites will also likely lead to conflicts with many development management policies which aim to provide open space, housing mix and affordable housing in schemes.

In order to address these issues, Green Belt release must be considered. By choosing to not release sites from the Green Belt, the housing target is reduced to a level that is unsound.

Yours sincerely



**Stuart Natkus**

Director