

From: [REDACTED]
To: [REDACTED]
Subject: Sheffield Plan - Policy SS17, Former Norton Aerodrome
Date: 20 February 2023 17:29:25
Attachments: [SheffieldNortonSheffieldPlanRep01.pdf](#)

Please find attached my representation into the Sheffield Plan with regard to proposed Policy SS17, Former Norton Aerodrome.

I would be grateful if you could acknowledge receipt of the attachment has having been duly made and I will look forward to engaging in the Sheffield Plan process moving forward.

Regards.

Nigel J Chambers

Director

Tangent Properties

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Tangent Properties (North) Ltd. Company Registration Number 3113278

Strategic Planning Team
Planning Service
City Futures
4th Floor
Howden House
Union Street
SHEFFIELD S1 2SH

20 February 2023

Dear Sir/Madam,

**SHEFFIELD PLAN: PUBLICATION DRAFT 2022
POLICY SS17: FORMER NORTON AERODROME**

I am writing to submit a formal representation into the Sheffield Plan (Publication Draft; 2022), specifically in respect of proposed Policy SS17 (Former Norton Aerodrome). I would also like to request to appear at the Public Examination when this takes place.

At this stage, I have no comment to make in respect of the legal compliance or the "soundness" of the overall Sheffield Plan (Plan). However, I do not consider that the Plan is "sound", with respect to proposed Policy SS17 (Former Norton Aerodrome), principally because the Policy is not consistent with national planning guidance. If the Plan is to be considered "sound" then Policy SS17 needs be amended so that it complies with this guidance.

I draw your attention to the following relevant matters from the Plan:

- "Strategic Sites" are defined in the Plan as allocations providing at least 200 homes (4 ha+) or 3000 sq m (1 ha+) of employment space. At 8.40 ha gross (6.72 ha net) Policy SS17 comfortably exceeds this threshold. I support this definition;
- On all "Strategic Sites" a Masterplan is required to be prepared to guide development of the land, if allocated. Accordingly, Policy SS17 will require the production of a Masterplan. I support this requirement;
- Policy NC9 (Housing Density) suggests a range of 40-70 dwellings per ha for sites which are located within easy walking distance of a tram stop(s). Policy SS17 is easily within 800m of 2 tram stops; Herdings Park being a maximum distance of around 600m from the farthest-most point of the allocation and Herdings/Leighton Road around 650m at the farthest-most point;

- Policy SP1 (Overall Growth Plan) refers to 19 sites which are allocated for mixed-use purposes; including 6 which are situated outside of the defined city centre area;
- Policy SS17 is the only proposed development land allocation which is currently located within the statutory Green Belt. I support the removal of the land from the Green Belt for development purposes. Exceptional circumstances can be demonstrated for its removal and, as previously-developed, brownfield land and with significant existing buildings and hard-standing in a sustainable location, within the Core Public Transport Network (CPTN) buffer, its development would align strongly with the principles of the NPPF.

Whilst removal of the land from the Green Belt is supported, I would argue that the proposed allocation of Policy SS17 fails to meet a number of further requirements of the NPPF and, unless amended, undermines the “soundness” of the Plan and calls into question the basis of the site’s removal from the Green Belt.

Chapters 11 of the NPPF (Making effective use of land) and 13 (Green Belt) are important in the context of Policy SS17. Paragraph 141 a) and b), in particular, state that when considering the issue of exceptional circumstances in the context of Green Belt release the policy-making authority needs to ensure that its strategy:

***“a) makes as much use as possible of suitable brownfield sites and underutilised land;
b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in ... locations well served by public transport”***
(my italics/underlining)

Paragraph 125 a) requires that the policy-making authority makes efforts to avoid homes being built at too low a density and that allocations make optimal use of each site:

“ a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination and should include the use of minimum density standards for...locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development...”
(my italics/underlining)

Whilst the NPPF seeks to focus upon optimising the use of brownfield land by the use of an appropriate increase in housing density in order to ensure that Green Belt land is only considered for allocation once such a process has been undertaken this does not negate a requirement to ensure that the best use is made of land which is proposed to

be removed from the Green Belt for housing purposes. This is doubly important if that land is brownfield and under-utilised and, at least in the case of the Sheffield Plan, the only proposed Green Belt land release. Moreover, unless a robust and proper analysis of the opportunity has been undertaken to recommend a minimum density which accords with the principles required of the NPPF, the allocation of the land and its removal from the Green Belt is undermined and the plan itself is not soundly based.

I would argue that the minimum density proposed in the Plan (40 dwellings per hectare) is far too low and fails to comply with the principles of the NPPF. Such a low density is likely to result in a standardised, volume house-builder, approach being taken which neither optimises the use of this key site nor seeks a significant uplift in density for a location which is close to two tram stops and within the CPTN buffer.

Recommendations:

I would recommend that the Council undertakes the following tasks in respect of proposed site SS17:

- A technical, evidenced-based, capacity exercise to determine the most suitable density for the site so that it accords with the principles set out in the NPPF. Given the sustainable location of the site and its excellent public transport connectivity, together with a location fronting the city's ring road, higher density apartments and townhouses seem more appropriate in the northern section of the site with a decreasing density to the south towards the remaining Green Belt;
- Upon completion of the above exercise makes an amendment to proposed Policy SS17, setting a minimum site density, significantly in excess of 40 dwellings per hectare. I note that the density range outlined in the Plan for sites outside of the city centre with good public transport connectivity is between 40 and 70 dwellings per hectare. Within the Council's own density range this could result in an increased provision from 270 units to 470 units harvested from the site. It may also be possible, subject to other factors, to set an even higher density should the above technical exercise evidence potential capacity beyond 70 dwellings per hectare;
- Consideration should be given to re-allocate Policy SS17 as a "Mixed-Use" land allocation, rather than purely for housing purposes. With an increased site density, which accords to the principles of the NPPF, there is likely to be scope for a wider mix of uses to create a more sustainable development and allow for better place-making.

I would be grateful if the Council could give consideration to my representation prior to the next stage of the Plan and take on board the recommendations set out above. To this end, I would be delighted to engage with officers to explore matters further.

Policy SS17 (Former Norton Aerodrome) is a key site and can play an important role in meeting the housing need for Sheffield. It also offers an opportunity to develop a high quality, well-designed, mixed use project which responds positively to its location fronting the ring road and with excellent public transport connectivity. Accordingly, the opportunity should be taken to meet the requirements of the NPPF by optimising the use of brownfield, under-utilised land and providing a significant increase in the density above that currently proposed which will result in better place-making.

I will look forward to engaging in the Plan process moving forward.

Kind regards.

Yours faithfully,

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Nigel J Chambers

A solid black rectangular redaction box covering the contact information.