

Sheffield Plan Main Modifications

Responses – by email

Reference numbers REF5.0101 to REF5.0150

Reference Number	Respondent Name	Organisation
REF5.0101	Lee & Sarah Montgomery	Individual
REF5.0102	Julie Harris	Wharncliffe Side Let's Breathe community group.
REF5.0103	Michelle & Steve Dewire	Individual
REF5.0104	Catherine Smith	Individual
REF5.0105	Crystal Farrer	Individual
REF5.0106	Abigail Staniforth	Individual
REF5.0107	Tracey Goulsbra	Individual
REF5.0108	Richard & Jayne Hull	Individual
REF5.0109	James Poore	Individual
REF5.0110	Andrew Linfoot	Individual
REF5.0111	Susan & Michael Housley	Individual
REF5.0112	Jessica Doncaster	Individual
REF5.0113	Tony Cope	Individual
REF5.0114	Diana Radford	Individual
REF5.0115	Sandra Poore	Individual
REF5.0116	John Bowler	Individual
REF5.0117	Carol Ann Bowler	Individual
REF5.0118	Robin Hughes	Joined Up Heritage Sheffield
REF5.0119	Ben Parkes	Savills
REF5.0120	Gary Johns	Individual
REF5.0121	Brian Parkin	Individual
REF5.0122	Chelsea Herring	Individual
REF5.0123	Helen Doncaster	Individual
REF5.0124	Deborah Hitchen	Individual
REF5.0125	Shannon Linfoot	Individual
REF5.0126	Sarah Johns	Individual
REF5.0127	Roger Hardwick	Individual
REF5.0128	Nik Reeves-McLaren	Individual
REF5.0129	Penny Miller	Individual

REF5.0130	Mahmood Azam	Individual
REF5.0131	Paul	Individual
REF5.0132	Adam Shephard	Individual
REF5.0133	Pauline & Vincent Green	Individual
REF5.0134	Ian Pearson	Individual
REF5.0135	Beshara Wad Ismail	Individual
REF5.0136	Barbara Parkin	Individual
REF5.0137	Alyson Fender	Individual
REF5.0138	Kathryn Currey	Individual
REF5.0139	Amy James	Tetlow King Planning and PlanD
REF5.0140	Christina A Stark	Individual
REF5.0141	Gillian Hall	Individual
REF5.0142	Messha Elliott	Individual
REF5.0143	Linda Dickinson	Individual
REF5.0144	Peter Jackson	Individual
REF5.0145	Amber Hotchen	Individual
REF5.0146	Charlie Hotchen	Individual
REF5.0147	Helen Roach	Individual
REF5.0148	Emily Bowler	Individual
REF5.0149	Kevin Kelly	Individual
REF5.0150	Becky Hurst	Individual

REF5.0101

Personal response to the Sheffield Plan – Main Modification reference – MM410 (site SES29) and MM411 (site SES30)

From sarah montgomery [REDACTED]
Date Fri 2026-04-24 7:14 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Personal response to the Sheffield Plan – Main Modification reference – **MM410** (site SES29).

I am aware that in other areas the examination of evidence is being properly investigated and sites are being removed where they are proven to be unsuitable or the Council's expectation undeliverable, and as such I would expect the same diligent care to be taken for Main Modification **MM410** (site SES29) and **MM411** (site SES30) .

1. I believe Main Modification **MM410** (site SES29) to be unsound and unjustified as it is not consistent with national policy. In fact, the Council's own plan states that the modified plan will be worse for the environment, as stated in their Integrated Impact Assessment (IIA).

In the interest of **ecology and biodiversity**, the proposed release of Green Belt land on site SES29 in March/April 2025, was supported by the Baseline Biodiversity Net Gain Assessment, which was written on 11th December, 2023, but that was only made public on 7th October, 2025. Unarguably, opaque, untimely, and out-of-date evidence. The document even demonstrates the value of the biodiversity the site offers and highlights gaps in the survey data, both of which are unresolved in MM410 before the allocation of site SES29 is carried forward.

Therefore, as the matter of ecology has been postponed until later master planning and application stages, and it remains up in the air with regards to MM410, with no resolution for the shortcoming, the allocation of SES29 into the Plan should not proceed. Justified by the fact that the supporting evidence is still incomplete and was already old at the time of being made public, and only made known after the allocation decision had effectively been taken.

2. Access and infrastructure are found to be unfit in the case of Main Modification **MM410** (site SES29). The modification acknowledges the access is "subject to further transport assessment work" demonstrating that the Council haven't yet worked out how to get in and out of the site.

In addition, the infrastructure in the area will need to be improved to accommodate the heavy goods transport and travel needs of the additional population to the area, which a development of this scale will generate. Including, substantial highway upgrades to the Retford Road / Beaver Hill Road junction (the same junction that SES30 also depends on), and space for a potential railway station, alongside the provision of protection for public footpaths, an archaeology assessment, and ecological buffers to nearby wildlife sites. All of which are unfunded and uncommitted at present, with no defined access plan.

Therefore, I believe the Main Modification **MM410** (site SES29) to be unsound and I request that the site be removed from the Plan and remain as a Green Belt.

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Personal response to the Sheffield Plan – Main Modification reference – **MM411** (SES30).

1. I believe the Main Modification **MM411** (site SES30) to be unsound and unjustified as it is not consistent with national policy.

Beaver Hill Road is already heavily used throughout the day. It is the bus route between Woodhouse and Handsworth, the access route for the Fire Training Centre and is used by Woodhouse Juniors FC for parking. Furthermore, Handsworth Grange Road, which will become an access route for many vehicles trying to avoid the gridlock, (which will only get worse), given that the road can scarcely cope with the traffic that uses it now, particularly at the beginning and end of the school day. Daily, there are so many parked cars on the road from local residents, the school and the doctors, it is frequently only appropriate for single lane traffic, often causing bottlenecks and grid lock.

Given that the development policy of the site says access is “subject to further transport assessment”, it is by its own declaration showing that the access problems have not been resolved. In addition, the extra traffic that a development on the proposed scale will generate so close to the school, will reduce the air quality for the school pupils, staff and local residents and increase noise levels.

Therefore, as safe and suitable access for a development of this scale has not been demonstrated, I believe the plan to be unsound for **MM411** (site SES30) and I request that the site be removed from the Plan and retained as Green Belt.

Lastly, there are questions as to whether the proposed sites can actually deliver what the Council expects. For the development on **MM411** (site SES30) to be successful, the Council would expect to be building 150 homes a year, which far exceeds the numbers that would usually be built on a site of this size, which doesn't already have the numerous constraints to contend with such as, Shirtcliff Wood, the ancient woodland adjacent, public access routes and an 800 metre watercourse, to name but a few, and all of which reduce the amount of land on the site for building houses – the main justification for releasing the Green Belt. Even the large Waverly development close by only achieves about 150 houses a year, with the benefit of numerous contractors working on a flat brownfield site, with no environmental or landscape limitations. Evidence in itself that the inclusion of **MM411** (site SES30) is not reasonable or justified and is unlikely to fulfil its quota.

Again, as it is questionable that the proposed site can even deliver what the Council expects, I believe it to be unsound and request that the inclusion of **MM411** (site SES30) be removed from the Plan and retained as Green Belt.

Yours sincerely


Lee and Sarah Montgomery

(S13 residents)

REF5.0102

Consultation on Main Modifications Sheffield Plan

From Julie Harris [REDACTED]
Date Fri 2026-04-24 7:58 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

 1 attachment (309 KB)
Sheffield Plan Consultation Letter_WSLB.pdf;

External email

Hi,

Please see the consultation representation attached, submitted by the Wharncliffe Side Let's Breathe community group.

Please could you supply a reference number for this representation.

Thanks,

Julie Harris (Chair of group)

Sheffield Plan-Consultation on Main Modifications

To: Strategic Planning

5th Floor, Howden House,

Sheffield, S1 2SH

Email: sheffieldplan@sheffield.gov.uk

Representation from Wharncliffe Side Let's Breathe. We are a voluntary, community group formed from residents of Wharncliffe Side Village. Our aim is to support local residents in raising their views and concerns regarding the proposed development of site NWS31, 'The Horse Field' as part of the Sheffield Plan, and liaise with Government Officers, The Council and other stakeholders in all issues relating to this, on behalf of the local community of Wharncliffe Side.

Dear Planning Inspector,

We wish to make a representation on the Main Modifications to The Sheffield Plan, and in particular, to modifications specifically relating to site allocation NWS31 (land between Storth Lane and School Lane S35 ODT).

Introduction

There are many factors that affect the viability and deliverability of site NWS31 including but not limited to, flood risk, site access and local highway issues. Most of these issues have yet to undergo detailed assessment. Development of the site would, without doubt, result in significant negative impacts to many local residents, particularly in the area of Health and Wellbeing due to loss of amenity of Green and Open Space.

The council have acknowledged in their *Integrated Impact Assessment Update and Addendum* document, that the current version of the Plan including new Green Belt Allocations, although bringing positive effects due to increased building capacity, will also bring with it increased negative effects in relation to sustainability, meaning there will be some degree of 'trade off'.

If this community is to accept this 'trade off', and the negative impacts of it, we are fully justified in asking for assurance that robust investigations have been undertaken to ascertain that the site is actually suitable and viable for development in the first place, otherwise its Green Belt status will have been removed for no discernible reason.

Secondly, **if** the development was proved possible, we need to have certainty that mitigations and compensation will be comprehensive and designed to meet the needs of **all** members of this community, whilst providing protection for the majority of wildlife on site. Minimal compensation is not justified given the negative impacts.

Main Modifications (MMs) to the Plan can therefore **not** be considered 'sound' unless they provide for full investigation of all issues that could impact site viability **before** the site is promoted for sale/development. In addition, MMs need to include enough site-specific detail to ensure that mitigations are deliverable, and provide the **best possible** outcome for the existing community and local wildlife.

A much better alternative exists. This would be to remove Site NWS31 from the allocation completely, and instead concentrate on developing one of the 'Large Windfall Sites' referred to in the Main Modifications (page/policy 19/SA2, 20/SA3&4, 21/SA5, 22/SA6, 24/MM77) or 'Opportunity Sites' (page 171/173). These are mentioned in the MM's to the Plan so clearly have already been identified as available, and some will be in the same area as site NWS31. More brownfield 'Windfall' sites will also emerge, especially if the council make another call for sites, which they have indicated they intend to do.

Additionally, recent evidence suggests that the additional Green Belt Allocations might not actually be needed, as the demographics of Sheffield are changing. Latest ONS data shows a decline in the birth rate and there has also been a significant decline in overseas student numbers (in the thousands). These will both have an impact on the amount and also type of building required in this city to meet its current and future needs.

The Main Modifications cannot be considered to be 'sound' unless there is certainty that housing requirement projections are accurate and have taken into account recent changes and trends in demographics that could have an impact on future housing requirements.

In view of the new evidence, and the *IIA update and addendum* and its findings on sustainability, reassessment of a Brownfield only option is likely justified.

The following points relate to **MM332 – Main Modifications for proposed Site Allocation NWS31 (page 141/2) – Conditions on Development.**

Loss of Amenity of Green and Open Space (ref. MM332, conditions 1,3)

The Council acknowledges that:

"The site is well used and valued by the local community as an informal area of natural greenspace, with formal and informal paths. It also provides connections to Glen Howe Park/Wood, Storth Lane and areas of Wharnccliffe Side south of Tinker Brook."

(ref. Sheff. Plan Green Belt Allocations: Compensatory Improvement Opportunities within remaining Green Belt)

They also say that:

"For Health and Wellbeing, some new site allocations may reduce the overall amenity experienced by nearby residents. Although the plan already includes measures to minimise these effects, it is unlikely that all remaining negative impacts can be fully avoided."

(ref. IIA report Addendum vi, page 38, Mitigation and Enhancement, Health and Wellbeing negative effects.)

Development of this site would result in a significant loss of amenity of this Green Space for local residents.

The Main Modifications are not ‘sound’ as they rely on the Council’s compensatory proposals (as outlined in *Sheffield Plan Green Belt Allocations: Compensatory Opportunities within Remaining Green Belt*), which are inadequate and do not address the needs of the community. They provide little or no compensation for those residents most negatively affected by loss of amenity of Green Space, including those with Protected Characteristics. Proposals for Open Space within the site are equally unsatisfactory.

Main Modifications are not ‘legal’ as those with Protected Characteristics (including older residents; those with disabilities; illness, and reduced mobility; and young children) will lose the amenity of local and accessible Green and Open Space, with no suitable and acceptable alternative. This would have a negative impact on their Health and Wellbeing and would disproportionately harm those from vulnerable groups. This would be a breach of the Equality Act 2010, which states “Planning decisions must consider how policies affect those with Protected Characteristics,” (*Public Sector Equality Duty*). It also contravenes the councils Integrated Impact Assessment Framework principle SA5, that states, “Open Space, Cultural, Leisure and Recreational facilities available for all.”

Evidence

- Proximity of Compensatory Space – The distance to remaining Green Belt will be significantly increased for many residents, particularly those who live in the central area of the village (Don Ave, Dixon Drive) and in many cases will exceed the recommended 300m. For many, including those with Protected Characteristics, this will be too far to walk.
- Any Open Space on site is proposed to be on the south side of the site, mainly in the form of an ecological buffer, which is once again too far to walk for some residents. The area is much less accessible for all, has uneven ground, is overgrown and mostly within the flood plain, so is often inaccessible due to waterlogged ground. The experience of this space is very different to the rest of the field, being dark, under the trees and with limited view. It is the remote area of the field that is not typically visited.
- Proposed compensation at Glen Howe Park – The area is steep, with woodland, and little view. The flood mitigation trees and ponds reduce available Open Space. Remote areas that are less safe for the public. Increased walking distance for many residents.
- Proposed compensation at Wharncliffe Avenue – Mainly sports provision for teens. This will be welcomed, however does not compensate most site users. There are safety issues for elderly residents and younger children. Increased walking distance for many residents.
- Proposed compensation, Don Valley trail – very remote from current site, inaccessible for many due to distance.
- Ageing population, with many at, or near retirement. Statistics show larger number of residents affected by illness or disability than other areas of city. Local school has additional facilities and excellent reputation for SEND provision, resulting in larger than average number of children living in village with SEND.
- Proposed closure of public rights of way during construction will have a large negative impact for residents and will disconnect the village. Alternative routes are less accessible (steps etc.), remote, less safe, and longer.
- Most users of the field use the public footpath accessed from Don Avenue.
- At hearings, the inspector acknowledged the importance of Green/Open Space for residents with Protected Characteristics being close to where they live.

Change Required

In order to protect the Health and Wellbeing of all residents, the Main Modifications need to state that: ‘ There should be an obligation for the council and planning teams to work with local community groups and residents to ensure that areas of public amenity Green/Open Space are retained on site and located in areas of the site that satisfy, and are appropriate to address, the needs of local residents, including those with Protected Characteristics. ‘

This should be done at master planning stage at the latest.

FLOOD RISK *(ref. MM332 condition point 4)*

Site NWS31 is known to have a significant problem with groundwater and drainage. The Level 2 Strategic Flood Risk Assessment (SFRA) failed to identify this problem. The Main Modifications rely on the accuracy of the SFRA, and as this issue could have a major impact on the viability and deliverability of the site, without a specific requirement for a detailed ground water assessment, the Main Modifications cannot be considered ‘sound’.

Evidence

- There are many examples of residents’ experience of groundwater on the site. Large areas of the field are often waterlogged during winter months and any extended periods of wet weather. The waterlogged areas can extend significantly up the site and are not just confined to areas in or near the flood plain for Tinker Brook.
- Problems with groundwater are not just confined to the site, but apply to the whole village and may be in part due to the existence of underground streams, the large areas of clay soil, and the topography of the land. There are currently issues with groundwater affecting the village community centre (currently closed as a result). Water has been seen gushing through garden walls during wet weather on roads close to the site.
- Historically, the development on Don Avenue, adjacent to site NWS31 which shares the same topography, encountered many problems with drainage during construction, including flooding of some nearby houses. Profit margins for the build were claimed to be negatively impacted.
- The site has not yet been assessed with respect to climate change.
- The Environment Agency has recently funded tree planting on site to act as natural flood mitigation. The SFRA identifies larger areas of the site with the potential for further planting. This not only illustrates the existence of a problem here, but also could affect site viability.

REQUIRED CHANGE

Main Modifications should include a requirement for full detailed assessments of groundwater and site run off to be carried out BEFORE the site is released for development. Assessment should account for worst case scenarios i.e. wet weather conditions. Further investigations should be carried out into possible mitigations and their likely success and impact on site viability. Areas intended for public footpath access/Open Space should also be assessed for suitability with respect to presence of groundwater

ACCESS OFF DON AVENUE (*ref. MM332 condition 6*)

The access point for the site was only confirmed by the council at the hearings stage of the consultation. As such, there has been limited opportunity for residents to make representations regarding this.

There are some complex issues surrounding access off Don Avenue. In order to be found 'sound', the Main Modifications need to be more specific in relation to these issues. The MM point is also not sound as it only specifies one entry point to the site, whereas sites of 100 homes or more usually require two access points.

Evidence

- There is congestion on Dixon Drive and the Brightholmlee Lane junction to Main Road.
- Safety issues around school. SEND pupils etc. and children playing out on the surrounding estate roads.
- Future limited parking provision.
- Access constraints for plant machinery due to narrow roads, parked vehicles and tight bends. Council construction repair works on proposed access roads are currently causing large amounts of disruption in the village.
- Access to residents' homes including disabled access and emergency vehicles, particularly around proposed site entrance. Installation of utilities to site would cut off access to a significant number of homes.
- Land drain and land slippage across the access point to site needs full investigation.
- Previous development on Don Ave – Building was avoided in the area immediately adjacent to site boundary (approx. 5m) due to alleged land unsuitability. This needs investigation.
- Local road infrastructure may need improvements to cope with heavy plant machinery and extra traffic.

Changes required

Main Modifications need to specify that:

-Traffic assessment needs to be detailed and consider safety issues around school and nearby estate roads, parking issues, access for plant machinery, impact on junctions etc.

-A detailed assessment is required to determine impact on access to residents' homes, including disabled access and emergency vehicles.

-Assessment of Land Drain and Land slippage/ground issues near the proposed site entrance should take place.

(In all cases, possible mitigations should be considered and assessed for Feasibility).

-A second site access point should be considered from Storth Lane.

-Retention of some public footpath access across the site during construction should be considered in collaboration with local community groups.

BIODIVERSITY (MM332 condition points 8,9,10)

The Main Modifications are not 'sound' in respect of Biodiversity as there is no specific mention of Protected Species, despite residents' presentation of clear evidence of their existence on site, both during the previous consultation and at the hearings.

As the site has been identified as having a high Biodiversity Net Gain value (Ecology Report), and the value is likely to increase after Protected Species values are added, in order for the MMs to be 'sound', there should be a commitment for BNG to be delivered on site in the first instance in line with BNG hierarchy.

Evidence

- Residents have presented clear photographic and video evidence of Protected Species on site including bats and barn owls.
- A bat roost exists at the end of Don Avenue adjacent to site (within 5m).
- Ecology report states requirement for a further detailed investigation of Protected Species.
- Ecology report recommended retention of some areas of grassland on site where possible.
- BNG does not currently include values for Protected Species or Watercourse

Changes Required

MMs should state that:

1. Further detailed assessment should be carried out for Protected Species present on site or very close to the site and BNG should be adjusted accordingly.
2. BNG for watercourse should be calculated.
3. Mitigations should be put into place for all identified Protected Species and their habitats including suitable buffers and light restrictions around forage areas and flight paths. This should apply to all habitats (bat roosts etc.) identified both on site and within close proximity to site.
4. Some areas of open grassland should be retained.

AND

Condition point 10 "where feasible" should be removed so that the statement reads: "Biodiversity Net Gain should be delivered on site within these areas in the first case, in line with the BNG hierarchy."

Yours Sincerely,

Wharnccliffe Side Let's Breathe (Community Group)

[Primary contact: Julie Harris (Chair)]

REF5.0103

My Objection of the planned site SES30 dated 24/4/26

From Michelle Dewire [REDACTED]
Date Fri 2026-04-24 10:24 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

For the attention of the strategic planning Team

This is,my objection for the planned site SES30 I want to object against the plan to build on Beaver Hill/Bramley S13 Greenbelt site
I wish for the plan not to go ahead for the following reasons stated below

I have lived with my husband on the [REDACTED]
And the proposed plan to use Beaver Avenue on our estate as the access point to gain entry to the mixed faith burial ground is not practical and is unjust .

Beaver estate has only 3 roads is a very small estate
Beaver Avenue is the main road used to gain entry to Beaver close and Beaver Drive .Beaver avenue is over crowded with parked cars from home owners who have no alternative means to park their cars.

Thus making the road Beaver Avenue difficult to access with cars and large vehicles on busy parts of the day and on evenings and weekends for residents who already live on here as it is .so using it as an entry point to a mixed faith buriel ground would make it worse . This estate is also used by parents who park their cars when taking their children to and from school to two schools close by Ballifield primary school and Handsworth Grange secondary schools in the mornings and teatimes so we have extra vehicles on the estate due to this . This plan hasnt been thought though at all and It is not sound at all .

Also Beaver hill main road is used by so many other areas locally and is extreamly busy at rush hour having traffic ques all the way up the road ,so to add two access roads from this main road to the proposed new housing estate and school proposed in your plan in SES30 would add even more traffic and is totally unjust.

On weekends this busy main road on Beaver hill road is also used on weekends by football matches for parents to park their cars the side of the main road its lined with cars parked making it difficult and unsafe to drive up and down .This simply hasnt been correctly monitored by yourselves before you've addressed your plan.

I am.totally against using the cinder hill Quaker Burial ground which is in the field behind Beaver drive, for you .to replace this Hystorical ground by putting a mixed faith burial ground in its place or building over it .

Cinder hill burial ground still has quaker graves in the field to date and is featured in many historical books about Handsworth. And is a big part of Handsworths history.

It is inherently and fundamentally unjust for you to just remove it or build on it .And is not a sound plan.

I can not understand why you can't extend the grave yard already in place at Orgreave Lane S13 . When you have already got the land and green space behind it in the SES29 plan. This would make more sense and be practical and sound .

My last point is that these proposed roads off BeaverHill Road will take away our green fields and green space that we use for our recreational and mental health and well being and have been used by many people for years locally .we need our green space its vital to us all so .why can you not leave SES30 as our green space instead of taking 94 percent of our green belt away .

This plan is unreasonable and unreliable. Its not just and is unsound

I think building on this greenspace in SES30 should be removed from the sheffield plan .

Yours sincerely

Mrs Michelle Dewire

Mr steve Dewire

Re: My Objection of the planned site SES30 dated 24/4/26

From Michelle Dewire [REDACTED]
Date Tue 2026-04-28 8:17 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear planning team i ive sent my latest objection to you last week. before the closing date of 5th may i forgot to add the code MM411 to my objection I sent it on line I only put SES30. I didnt realise I needed to add the other reference MM411. Could you add it to my objection please. [REDACTED]

Many thanks
Mrs Michelle Dewire
Mr steve Dewire

On Fri, 24 Apr 2026, 22:24 Michelle Dewire, [REDACTED] wrote:

For the attention of the strategic planning team

This is,my objection for the planned site SES30 I want to object against the plan to build on Beaver Hill/Bramley S13 Greenbelt site
I wish for the plan not to go ahead for the following reasons stated below

I have lived with my husband on the [REDACTED]
And the proposed plan to use Beaver Avenue on our estate as the access point to gain entry to the mixed faith burial ground is not practical and is unjust .

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Also Beaver hill main road is used by so many other areas locally and is extreemly busy at rush hour having traffic ques all the way up the road ,so to add two access roads from this main road to the proposed new housing estate and school proposed in your plan in SES30 would add even more traffic and is totally unjust.
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I am totally against using the cinder hill Quaker Burial ground which is in the field behind Beaver drive, for you to replace this historical ground by putting a mixed faith burial ground in its place or building over it.

Cinder hill burial ground still has quaker graves in the field to date and is featured in many historical books about Handsworth. And is a big part of Handsworth's history.

It is inherently and fundamentally unjust for you to just remove it or build on it. And is not a sound plan.

I can not understand why you can't extend the grave yard already in place at Orgreave Lane S13. When you have already got the land and green space behind it in the SES29 plan. This would make more sense and be practical and sound.

My last point is that these proposed roads off Beaver Hill Road will take away our green fields and green space that we use for our recreational and mental health and well being and have been used by many people for years locally. We need our green space it's vital to us all so why can you not leave SES30 as our green space instead of taking 94 percent of our green belt away.

This plan is unreasonable and unreliable. It's not just and is unsound.

I think building on this greenspace in SES30 should be removed from the Sheffield plan.

Yours sincerely

Mrs Michelle Dewire

Mr Steve Dewire

REF5.0104

Objection to the Proposed Main Modifications to the Sheffield Local Plan- site SS19

From [REDACTED]
Date Sat 2026-04-25 1:19 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>



Dear Strategic Planning Team,

I am writing to object to the proposed Main Modifications to the Sheffield Local Plan, and particularly those that impact site SS19. While I recognise the need for a sound and deliverable plan, several of the modifications materially weaken safeguards that are essential for public safety, statutory compliance, and the fair distribution of development impacts across the city.

For these reasons, the proposed modifications fail to meet the tests of soundness set out in paragraph 36 of the National Planning Policy Framework (NPPF), specifically that the Plan must be justified, effective, and consistent with national policy.

I therefore set out below my objections to specific modifications.

MM7- This reframes the purpose of the Green Belt by highlighting only its role in supporting urban regeneration, while omitting the full set of Green Belt purposes set out in the NPPF. This narrow and reductive wording misrepresents national policy, weakens the strategic function of the Green Belt, and risks distorting future decision-making by implying that regeneration is its primary or sole purpose. Sheffield's Green Belt prevents sprawl and safeguards the countryside, yet MM7's selective emphasis creates an imbalanced narrative that could be used to justify further releases. The modification is therefore not justified, not effective, and should be amended to reflect the complete statutory purposes of the Green Belt.

Further to this, paragraph 5.9.8 of the Impact Assessment Report Addendum: Modifications Consultation (referred to in this document as IIA from this point, which can be found [here](#)) confirms that 'permanent negative effects would remain' on the environment and landscape character of SS19 as a result of its development. The assessment also confirms in paragraph 5.9.12 that the moderation of allocating green belt sites for development will have predominantly negative effects that will be difficult to fully mitigate.

MM10 MM11 MM90-MM93 - The Sheffield Local Plan relies on a significant windfall allowance of 7,475 homes out of a total supply of 39,159 homes (MM90), equating to approximately 19% of the overall housing supply.

This represents a substantial proportion of housing delivery being dependent on unallocated and uncertain sites, which by definition are not plan-led. The Plan does not provide sufficient

evidence to demonstrate that this level of windfall delivery will be realised in a consistent, sustainable, or timely manner.

MM92 defines that the housing trajectory shows that the Sheffield Local Plan delivers only 298 dwellings above the identified requirement of 38,020 homes.

This represents a margin of less than 1% across the entire plan period, providing no meaningful flexibility to account for delays, non-delivery, viability issues, or infrastructure constraints. This is particularly concerning given the Plan provides only a very small margin above its housing requirement, meaning any shortfall in windfall delivery would result in the Plan failing to meet its targets.

MM18- With SS19 being one of the first green belt sites to be developed, and a year 7 place deficit until 2028/29, this does not provide the assurance that there will be adequate educational provision in the S12 area. Paragraph 3.2.3 of the Integrated Impact Assessment Report Addendum: Modifications Consultation (document [here](#)) states that, if a city centre school was built, it would be unlikely to be ready in time for the forecast peak deficit in places, weakening this mitigation further still. The moderation also fails to address how the educational needs of a post 16 student population, which continues to rise and will peak in 2028/29, will be met. This is a particular concern for S12 as the population will increase significantly with the planned development and south-east Sheffield has no post-16 provision.

There are also significant concerns about primary school provision across the S12 area, with Charnock Primary Academy (the primary school closest to SS19) already being oversubscribed by 33% (Sheffield City Council, 2025). The plan proposes the development of approximately 1,600 new homes in this part of the city (Draft Sheffield Local Plan Interactive Map and Sheffield Additional Site Allocations), growth that would ordinarily require a new primary school if delivered as a single strategic development. However the plan fails to demonstrate that essential education infrastructure can support the proposed level of growth.

MM19- The wording “include consideration” is non-binding and fails to secure delivery. The modification does not commit to a new facility, which is not allocated a site, and does not address the spatial mismatch between need and provision. S12, which lies outside the Central Sub-Area, is expected to absorb significant residential growth with just one extra consultation room being allocated to the area in the plan, despite having pockets of high deprivation and subsequent poor health outcomes. MM19 does not demonstrate how healthcare needs arising from this growth will be met, and fails the NPPF tests of effectiveness and justification, and risks exacerbating health inequalities unless strengthened.

Concerns around the impact of development on health and wellbeing are supported by the revised IIA (which can be found [here](#)) which states that ‘some new site allocations may reduce the overall amenity experienced by nearby residents. Although the Plan already includes measures to minimise these effects, it is unlikely that all remaining negative impacts can be fully avoided’. Paragraph 5.2.2 of this document also acknowledges that removal of greenbelt will have ‘some negative effects in terms of mental health and wellbeing’ on surrounding communities.

MM20 -The phrase “wherever practicable” is unacceptably ambiguous in a policy area that is critical to sustainable development and infrastructure delivery. It provides no commitment or assurance that transport improvements will be secured. The modification fails the NPPF tests of effectiveness and clarity, and risks undermining modal shift, accessibility, and safety objectives. It also weakens the plan’s ability to secure equitable outcomes across sub-areas. The wording must be replaced with a firm commitment to secure transport improvements

proportionate to development scale and impact, supported by planning obligations and the Infrastructure Delivery Plan.

This is particularly important for the S12 area, where transport is a significant concern in relation to the scale of development proposed. The Sheffield Local Plan identifies approximately 1,600 new homes across S12, which will inevitably generate a substantial increase in traffic movements and place additional pressure on an already constrained local road network. However, due to the dispersed spatial distribution of these allocations, there is currently no clear or coordinated transport strategy demonstrating how the cumulative impact of these developments will be mitigated.

The plan does not provide sufficient detail regarding required junction improvements, public transport capacity, pedestrian and cycling infrastructure, or wider highway mitigation measures necessary to support this level of growth. Without clear and deliverable transport commitments, there is a risk that the cumulative traffic impacts will significantly worsen congestion, reduce road safety, and undermine the sustainability of the area. Paragraph 5.6.5. If the IIA states that site SS19 'benefits from its proximity to the blue tram route and a high-frequency bus corridor', however, the lived experience of current residents is that this route is already under pressure during peak times and buses are infrequent and unreliable. As such, it is unclear how the proposed level of housing growth in S12 can be accommodated without substantial and clearly defined transport infrastructure improvements.

MM127 & MM128- The Plan suggests that Green Belt windfall sites could deliver up to 50% affordable housing, but there is no evidence this is achievable in practice. In fact, the Council's own evidence shows that sites like SS19 are only likely to deliver around 30% affordable housing. This creates a clear gap between what the policy promises and what can actually be delivered.

The Plan also relies on "windfall" sites to deliver higher levels of affordable housing. However, windfall sites are uncertain and cannot be guaranteed to come forward, or to deliver the infrastructure and affordable housing needed.

This means the Plan is relying on outcomes that may never happen, while still allowing development on Green Belt land.

The Council's own housing needs evidence shows that the majority of housing need in Sheffield is for affordable housing. However, the Plan relies on sites such as SS19 that are only likely to deliver around 30% affordable housing, alongside uncertain windfall development. This fails to align with the identified need and undermines the justification for releasing Green Belt land. As a result, the approach is not justified, not reliable, and does not provide confidence that the promised affordable housing will be delivered.

MM224 MM 227- These modifications recognise that some sites have constraints (such as flood risk, access issues, and environmental limits), but there is no evidence of any level of recalculation to ascertain the reduction in buildable area and therefore reduction of the number of homes expected from those sites.

This raises concerns that the Plan is overestimating how many homes can actually be delivered. If parts of sites cannot be built on, the total housing numbers should be reduced accordingly.

In the case of sites such as SES13, the Plan acknowledges the need for buffers but does not reassess how this affects the number of homes the site can deliver.

More worryingly, SS19 is not included in these modifications even with significant constraints, including flood risk and the ecological corridor as well as additional buffers for the brook and hedgerows, this creates a risk that the Plan is relying on housing numbers that

are not realistic, which undermines confidence that the overall housing target can be met & with such a low “buffer” of housing above the target, the plan could fail should the reality be reflected.

As a result, the Plan is not reliable, the modifications are not consistent across sites and does not provide a clear or accurate picture of what can actually be delivered.

MM429 (SS19) - The S12 Green Belt Action Group has submitted two previous consultation statements for MM429 (SS19) which highlight significant site constraints including flood risk and the ecological corridor, the need to protect the robin brook and its impact on the Moss Valley SSSI along with access constraints and hedgerow buffers but SS19 is not referenced in MM224 or MM227, which should require recalculation of housing impact across site allocations. This omission is concerning. If SS19’s constraints are serious enough to warrant modification text, they should also trigger a reassessment of its contribution to housing supply. The failure to cross-reference SS19 in the impact recalculation undermines the credibility of the housing trajectory and suggests that constraint-driven reductions are not being applied consistently. This raises soundness concerns under NPPF paragraph 36(b) and (c): the plan may not be justified or effective if constrained sites are retained without transparent recalibration. The inconsistency also risks undermining spatial equity, as less constrained sites may be overburdened to compensate for undeliverable allocations like SS19.

It is also apparent that even with amended brook buffers and hedgerow buffers, the appropriate buffering has not been removed from the developable area, it is believed this will have an impact on the number of houses that are deliverable on the site and therefore impact the viability of the site.

The modifications also fail to consider the impact of North East Derbyshire District Council’s Local Plan, particularly its proposed allocation immediately adjacent to SS19 (site reference 45900), which could deliver a further 348 homes alongside shops or a care facility. It is significant that the landowner, promoter and developer for site 45900 are the same as for SS19, yet NEDDC has assessed 45900 as unsuitable for development due to the same constraints repeatedly raised in relation to SS19.

The development of 45900 would create a single, continuous cross-boundary block of development that would clearly conflict with several of the Green Belt purposes set out in national policy: they would **fail to check the unrestricted sprawl** of the existing built-up area, **erode the separation between Sheffield and North East Derbyshire**, and **constitute significant countryside encroachment**. The two developments would effectively double the size of the Charnock estate with no planned proportionate infrastructure to support this rapid growth.

There appears to have been no meaningful collaboration with Sheffield City Council to assess the combined effects of these neighbouring proposals. The absence of any cross-boundary assessment represents a clear gap in the evidence base and undermines the justification for retaining SS19 in the plan.

This raises serious concerns regarding compliance with the Duty to Cooperate and further undermines the soundness of the Plan.

In conclusion, the main modifications do not adequately address the constraints and concerns highlighted in previous consultations, or during the public hearings. For the plan to be sound, it depends on modifications being made, however those proposed are vague and lack the detail to demonstrate that they are specific, credible, deliverable or proportionate to the scale of the development in the area. This fails to align with paragraph 42 of the NPPF which states that ‘the more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits’.

I therefore urge the Inspectors to require further modifications, including the removal or reassessment of SS19, to ensure the Plan is sound

I appreciate the opportunity to comment and urge the Inspectors and the Council to reconsider the Main Modifications to ensure the Local Plan remains robust, equitable, and fit for purpose.

Please consider building this plan of houses in the town centre not ruining precious greenbelt and leaving wildlife without a home. This is something we'll never be able to replace. We need green spaces now more than ever with dwindling wildlife and bird populations. PLEASE STOP AND THINK!

Yours sincerely,

Catherine smith

Sent from my Galaxy

REF5.0105

S12 Green Belt Action Group Sheffield Objection Template

From Crystal Farrer [REDACTED]
Date Sat 2026-04-25 6:57 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Strategic Planning Team,

I am writing to object to the proposed Main Modifications to the Sheffield Local Plan, and particularly those that impact site SS19. While I recognise the need for a sound and deliverable plan, several of the modifications materially weaken safeguards that are essential for public safety, statutory compliance, and the fair distribution of development impacts across the city.

For these reasons, the proposed modifications fail to meet the tests of soundness set out in paragraph 36 of the National Planning Policy Framework (NPPF), specifically that the Plan must be justified, effective, and consistent with national policy.

I therefore set out below my objections to specific modifications.

MM7- This reframes the purpose of the Green Belt by highlighting only its role in supporting urban regeneration, while omitting the full set of Green Belt purposes set out in the NPPF. This narrow and reductive wording misrepresents national policy, weakens the strategic function of the Green Belt, and risks distorting future decision-making by implying that regeneration is its primary or sole purpose. Sheffield's Green Belt prevents sprawl and safeguards the countryside, yet MM7's selective emphasis creates an imbalanced narrative that could be used to justify further releases. The modification is therefore not justified, not effective, and should be amended to reflect the complete statutory purposes of the Green Belt.

Further to this, paragraph 5.9.8 of the Impact Assessment Report Addendum: Modifications Consultation (referred to in this document as IIA from this point, which can be found here) confirms that 'permanent negative effects would remain' on the environment and landscape character of SS19 as a result of its development. The assessment also confirms in paragraph 5.9.12 that the moderation of allocating green belt sites for development will have predominantly negative effects that will be difficult to fully mitigate.

MM10 MM11 MM90-MM93 - The Sheffield Local Plan relies on a significant windfall allowance of 7,475 homes out of a total supply of 39,159 homes (MM90), equating to approximately 19% of the overall housing supply.

This represents a substantial proportion of housing delivery being dependent on unallocated and uncertain sites, which by definition are not plan-led. The Plan does not provide sufficient

evidence to demonstrate that this level of windfall delivery will be realised in a consistent, sustainable, or timely manner.

MM92 defines that the housing trajectory shows that the Sheffield Local Plan delivers only 298 dwellings above the identified requirement of 38,020 homes.

This represents a margin of less than 1% across the entire plan period, providing no meaningful flexibility to account for delays, non-delivery, viability issues, or infrastructure constraints. This is particularly concerning given the Plan provides only a very small margin above its housing requirement, meaning any shortfall in windfall delivery would result in the Plan failing to meet its targets.

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There are also significant concerns about primary school provision across the S12 area, with Charnock Primary Academy (the primary school closest to SS19) already being oversubscribed by 33% (Sheffield City Council, 2025). The plan proposes the development of approximately 1,600 new homes in this part of the city (Draft Sheffield Local Plan Interactive Map and Sheffield Additional Site Allocations), growth that would ordinarily require a new primary school if delivered as a single strategic development. However the plan fails to demonstrate that essential education infrastructure can support the proposed level of growth.

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This is particularly important for the S12 area, where transport is a significant concern in relation to the scale of development proposed. The Sheffield Local Plan identifies approximately 1,600 new homes across S12, which will inevitably generate a substantial increase in traffic movements and place additional pressure on an already constrained local road network. However, due to the dispersed spatial distribution of these allocations, there is currently no clear or coordinated transport strategy demonstrating how the cumulative impact of these developments will be mitigated.

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This raises concerns that the Plan is overestimating how many homes can actually be delivered. If parts of sites cannot be built on, the total housing numbers should be reduced accordingly.

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More worryingly, SS19 is not included in these modifications even with significant constraints, including flood risk and the ecological corridor as well as additional buffers for the brook and hedgerows, this creates a risk that the Plan is relying on housing numbers that are not realistic, which undermines confidence that the overall housing target can be met & with such a low "buffer" of housing above the target, the plan could fail should the reality be reflected.

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The modifications also fail to consider the impact of North East Derbyshire District Council's Local Plan, particularly its proposed allocation immediately adjacent to SS19 (site reference 45900), which could deliver a further 348 homes alongside shops or a care facility. It is significant that the landowner, promoter and developer for site 45900 are the same as for SS19, yet NEDDC has assessed 45900 as unsuitable for development due to the same constraints repeatedly raised in relation to SS19.

The development of 45900 would create a single, continuous cross-boundary block of development that would clearly conflict with several of the Green Belt purposes set out in national policy: they would fail to check the unrestricted sprawl of the existing built-up area, erode the separation between Sheffield and North East Derbyshire, and constitute significant countryside encroachment. The two developments would effectively double the size of the Charnock estate with no planned proportionate infrastructure to support this rapid growth.

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This raises serious concerns regarding compliance with the Duty to Cooperate and further undermines the soundness of the Plan.

In conclusion, the main modifications do not adequately address the constraints and concerns highlighted in previous consultations, or during the public hearings. For the plan to be sound, it depends on modifications being made, however those proposed are vague and lack the detail to demonstrate that they are specific, credible, deliverable or proportionate to the scale of the development in the area.

This fails to align with paragraph 42 of the NPPF which states that 'the more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits'.

I therefore urge the Inspectors to require further modifications, including the removal or reassessment of SS19, to ensure the Plan is sound


I appreciate the opportunity to comment and urge the Inspectors and the Council to reconsider the Main Modifications to ensure the Local Plan remains robust, equitable, and fit for purpose.

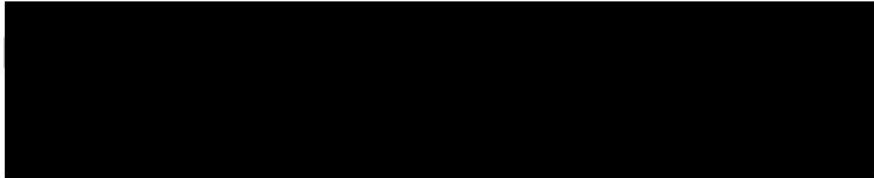
Yours sincerely,

Miss Crystal Farrer

REF5.0106

S12 Green Belt Sheffield Objection

From Abigail Staniforth 
Date Sat 2026-04-25 7:44 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>



Dear Strategic Planning Team,

I am writing to object to the proposed Main Modifications to the Sheffield Local Plan, and particularly those that impact site SS19. While I recognise the need for a sound and deliverable plan, several of the modifications materially weaken safeguards that are essential for public safety, statutory compliance, and the fair distribution of development impacts across the city.

For these reasons, the proposed modifications fail to meet the tests of soundness set out in paragraph 36 of the National Planning Policy Framework (NPPF), specifically that the Plan must be justified, effective, and consistent with national policy.

I therefore set out below my objections to specific modifications.

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This represents a substantial proportion of housing delivery being dependent on unallocated and uncertain sites, which by definition are not plan-led. The Plan does not provide sufficient evidence to demonstrate that this level of windfall delivery will be realised in a consistent, sustainable, or timely manner.

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There are also significant concerns about primary school provision across the S12 area, with Charnock Primary Academy (the primary school closest to SS19) already being oversubscribed by 33% (Sheffield City Council, 2025). The plan proposes the development of approximately 1,600 new homes in this part of the city (Draft Sheffield Local Plan Interactive Map and Sheffield Additional Site Allocations), growth that would ordinarily require a new primary school if delivered as a single strategic development. However the plan fails to demonstrate that essential education infrastructure can support the proposed level of growth.

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This fails to align with paragraph 42 of the NPPF which states that 'the more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits'.

I therefore urge the Inspectors to require further modifications, including the removal or reassessment of SS19, to ensure the Plan is sound

I appreciate the opportunity to comment and urge the Inspectors and the Council to reconsider the Main Modifications to ensure the Local Plan remains robust, equitable, and fit for purpose.

Yours sincerely,

Abigail Staniforth

REF5.0107

Subject: Objection to the Proposed Main Modifications to the Sheffield

From Tracey Goulsbra [REDACTED]
Date Sat 2026-04-25 10:50 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Local Plan- site SS19

Dear Strategic Planning Team,

I am writing to object to the proposed Main Modifications to the Sheffield Local Plan, and particularly those that impact site SS19. While I recognise the need for a sound and deliverable plan, several of the modifications materially weaken safeguards that are essential for public safety, statutory compliance, and the fair distribution of development impacts across the city.

For these reasons, the proposed modifications fail to meet the tests of soundness set out in paragraph 36 of the National Planning Policy Framework (NPPF), specifically that the Plan must be justified, effective, and consistent with national policy.

I therefore set out below my objections to specific modifications.

MM7- This reframes the purpose of the Green Belt by highlighting only its role in supporting urban regeneration, while omitting the full set of Green Belt purposes set out in the NPPF. This narrow and reductive wording misrepresents national policy, weakens the strategic function of the Green Belt, and risks distorting future decision-making by implying that regeneration is its primary or sole purpose. Sheffield's Green Belt prevents sprawl and safeguards the countryside, yet MM7's selective emphasis creates an imbalanced narrative that could be used to justify further releases. The modification is therefore not justified, not effective, and should be amended to reflect the complete statutory purposes of the Green Belt.

Further to this, paragraph 5.9.8 of the Impact Assessment Report Addendum:

Modifications Consultation (referred to in this document as IIA from this point, which can be found here) confirms that 'permanent negative effects would remain' on the environment and landscape character of SS19 as a result of its development. The assessment also confirms in paragraph 5.9.12 that the moderation of allocating green belt sites for development will have predominantly negative effects that will be difficult to fully mitigate. MM10 MM11 MM90-MM93 - The Sheffield Local Plan relies on a significant windfall allowance of 7,475 homes out of a total supply of 39,159 homes (MM90), equating to approximately 19% of the overall housing supply.

This represents a substantial proportion of housing delivery being dependent on unallocated and uncertain sites, which by definition are not plan-led. The Plan does not

provide sufficient evidence to demonstrate that this level of windfall delivery will be realised in a consistent, sustainable, or timely manner.

MM92 defines that the housing trajectory shows that the Sheffield Local Plan delivers only 298 dwellings above the identified requirement of 38,020 homes.

This represents a margin of less than 1% across the entire plan period, providing no meaningful flexibility to account for delays, non-delivery, viability issues, or infrastructure constraints. This is particularly concerning given the Plan provides only a very small margin above its housing requirement, meaning any shortfall in windfall delivery would result in the Plan failing to meet its targets.

MM18- With SS19 being one of the first green belt sites to be developed, and a year 7 place deficit until 2028/29, this does not provide the assurance that there will be

adequate educational provision in the S12 area. Paragraph 3.2.3 of the Integrated

Impact Assessment Report Addendum: Modifications Consultation ([document here](#))

states that, if a city centre school was built, it would be unlikely to be ready in time for

the forecast peak deficit in places, weakening this mitigation further still. The moderation also fails to address how the educational needs of a post 16 student population, which continues to rise and will peak in 2028/29, will be met. This is a particular concern for S12 as the population will increase significantly with the planned development and south-east Sheffield has no post-16 provision.

There are also significant concerns about primary school provision across the S12 area, with Charnock Primary Academy (the primary school closest to SS19) already being oversubscribed by 33% (Sheffield City Council, 2025). The plan proposes the

development of approximately 1,600 new homes in this part of the city (Draft Sheffield

Local Plan Interactive Map and Sheffield Additional Site Allocations), growth that would ordinarily require a new primary school if delivered as a single strategic development.

However the plan fails to demonstrate that essential education infrastructure can

support the proposed level of growth. MM19- The wording "include consideration" is non-binding and fails to secure delivery.

The modification does not commit to a new facility, which is not allocated a site, and

does not address the spatial mismatch between need and provision. S12, which lies

outside the Central Sub-Area, is expected to absorb significant residential growth with

just one extra consultation room being allocated to the area in the plan, despite having pockets of high deprivation and subsequent poor health outcomes. MM19 does not demonstrate how healthcare needs arising from this growth will be met, and fails the NPPF tests of effectiveness and justification, and risks exacerbating health inequalities unless strengthened.

Concerns around the impact of development on health and wellbeing are supported by

the revised IIA ([which can be found here](#)) which states that 'some new site allocations

may reduce the overall amenity experienced by nearby residents. Although the Plan already includes measures to minimise these effects, it is unlikely that all remaining negative impacts can be fully avoided'. Paragraph 5.2.2 of this document also acknowledges that removal of greenbelt will have 'some negative effects in terms of mental health and wellbeing' on surrounding communities.

MM20 -The phrase "wherever practicable" is unacceptably ambiguous in a policy area that is critical to sustainable development and infrastructure delivery. It provides no commitment or assurance that transport improvements will be secured. The

modification fails the NPPF tests of effectiveness and clarity, and risks undermining modal shift, accessibility, and safety objectives. It also weakens the plan's ability to secure equitable outcomes across sub-areas. The wording must be replaced with a firm commitment to secure transport improvements proportionate to development scale and impact, supported by planning obligations and the Infrastructure Delivery Plan.

This is particularly important for the S12 area, where transport is a significant concern in relation to the scale of development proposed. The Sheffield Local Plan identifies

approximately 1,600 new homes across S12, which will inevitably generate a substantial increase in traffic movements and place additional pressure on an already

constrained local road network. However, due to the dispersed spatial distribution of these allocations, there is currently no clear or coordinated transport strategy demonstrating how the cumulative impact of these developments will be mitigated.

The plan does not provide sufficient detail regarding required junction improvements, public transport capacity, pedestrian and cycling infrastructure, or wider highway mitigation measures necessary to support this level of growth. Without clear and

deliverable transport commitments, there is a risk that the cumulative traffic impacts will significantly worsen congestion, reduce road safety, and undermine the sustainability of the area. Paragraph 5.6.5. If the IIA states that site SS19 'benefits from its proximity to the blue tram route and a high-frequency bus corridor', however, the lived experience of current residents is that this route is already under pressure during peak times and buses are infrequent and unreliable. As such, it is unclear how the proposed level of housing growth in S12 can be accommodated without substantial and clearly defined transport infrastructure improvements.

MM127 & MM128- The Plan suggests that Green Belt windfall sites could deliver up to

50% affordable housing, but there is no evidence this is achievable in practice. In fact, the Council's own evidence shows that sites like SS19 are only likely to deliver around 30% affordable housing. This creates a clear gap between what the policy promises and what can actually be delivered.

The Plan also relies on "windfall" sites to deliver higher levels of affordable housing.

However, windfall sites are uncertain and cannot be guaranteed to come forward, or to

deliver the infrastructure and affordable housing needed.

This means the Plan is relying on outcomes that may never happen, while still allowing development on Green Belt land.

The Council's own housing needs evidence shows that the majority of housing need in Sheffield is for affordable housing. However, the Plan relies on sites such as SS19 that are only likely to deliver around 30% affordable housing, alongside uncertain windfall development. This fails to align with the identified need and undermines the justification for releasing Green Belt land. As a result, the approach is not justified, not reliable, and does not provide confidence that the promised affordable housing will be delivered.

MM224 MM 227- These modifications recognise that some sites have constraints (such as flood risk, access issues, and environmental limits), but there is no evidence of any level of recalculation to ascertain the reduction in buildable area and therefore reduction of the number of homes expected from those sites.

This raises concerns that the Plan is overestimating how many homes can actually be delivered. If parts of sites cannot be built on, the total housing numbers should be reduced accordingly.

In the case of sites such as SES13, the Plan acknowledges the need for buffers but does not reassess how this affects the number of homes the site can deliver. More worryingly, SS19 is not included in these modifications even with significant

constraints, including flood risk and the ecological corridor as well as additional buffers for the brook and hedgerows, this creates a risk that the Plan is relying on housing numbers that are not realistic, which undermines confidence that the overall housing target can be met & with such a low "buffer" of housing above the target, the plan could fail by should the reality be reflected.

As a result, the Plan is not reliable, the modifications are not consistent across sites and does not provide a clear or accurate picture of what can actually be delivered.

MM429 (SS19) - The S12 Green Belt Action Group has submitted two previous consultation statements for MM429 (SS19) which highlight significant site constraints including flood risk and the ecological corridor, the need to protect the robin brook and its impact on the Moss Valley SSSI along with access constraints and hedgerow buffers but SS19 is not referenced in MM224 or MM227, which should require recalculation of housing impact across site allocations. This omission is concerning. If SS19's constraints are serious enough to warrant modification text, they should also trigger a reassessment of its contribution to housing supply. The failure to cross-reference SS19 in the impact recalculation undermines the credibility of the housing trajectory and suggests that constraint-driven reductions are not being applied consistently. This raises soundness concerns under NPPF paragraph 36(b) and (c): the plan may not be justified or effective if constrained sites are retained without transparent recalibration. The inconsistency also risks undermining spatial equity, as less constrained sites may be overburdened to compensate for undeliverable allocations like SS19.

It is also apparent that even with amended brook buffers and hedgerow buffers, the appropriate buffering has not been removed from the developable area, it is believed

this will have an impact on the number of houses that are deliverable on the site and therefore impact the viability of the site.

The modifications also fail to consider the impact of North East Derbyshire District Council's Local Plan, particularly its proposed allocation immediately adjacent to SS19 (site reference 45900), which could deliver a further 348 homes alongside shops or a care facility. It is significant that the landowner, promoter and developer for site 45900 are the same as for SS19, yet NEDDC has assessed 45900 as unsuitable for development due to the same constraints repeatedly raised in relation to SS19.

The development of 45900 would create a single, continuous cross-boundary block of development that would clearly conflict with several of the Green Belt purposes set out in national policy: they would fail to check the unrestricted sprawl of the existing built-up area, erode the separation between Sheffield and North East Derbyshire, and constitute significant countryside encroachment. The two developments would effectively double the size of the Charnock estate with no planned proportionate infrastructure to support this rapid growth.

There appears to have been no meaningful collaboration with Sheffield City Council to assess the combined effects of these neighbouring proposals. The absence of any cross-boundary assessment represents a clear gap in the evidence base and undermines the justification for retaining SS19 in the plan.

This raises serious concerns regarding compliance with the Duty to Cooperate and further undermines the soundness of the Plan.

In conclusion, the main modifications do not adequately address the constraints and concerns highlighted in previous consultations, or during the public hearings. For the plan to be sound, it depends on modifications being made, however those proposed are vague and lack the detail to demonstrate that they are specific, credible, deliverable or proportionate to the scale of the development in the area.

This fails to align with paragraph 42 of the NPPF which states that 'the more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits'.

I therefore urge the Inspectors to require further modifications, including the removal or reassessment of SS19, to ensure the Plan is sound. I appreciate the opportunity to comment and urge the Inspectors and the Council to reconsider the Main Modifications to ensure the Local Plan remains robust, equitable, and fit for purpose.

Yours sincerely,

Tracey Goulsbra

REF5.0108

objection to building on site known as SES13 to the east of Jaunty Avenue

From Richard Hull [REDACTED]

Date Sat 2026-04-25 12:44 PM

To [REDACTED]

External email

For the attention of: Clive Betts MP, Birley Ward Councillors and Sheffield City Council Strategic Planning Team.

We are writing to express our views and to object to the proposal to build 75 homes on land to the east of Jaunty Avenue (Site Ref. SES13) and also the impact of development on the local area as a whole.

Site SES13 was included in the Sheffield Local Plan some years ago without any publicity or consultation with local residents. Our home [REDACTED] and the only thing that alerted us and neighbours to the fact that there may be plans to build on it was when we saw surveyors on the site in February 2025. We spent a great deal of time trying to find out what was happening with the site, eventually discovering that it had been allocated in the draft Sheffield Local Plan as a potential site for 75 homes. Although we are IT literate and fairly intelligent the information was hard to find and the complex documents were full of jargon and difficult to understand. By the time we had established what was happening we were unable to comment as the consultation period had closed some time ago. It would seem unfair and underhanded that this site was allowed to slip in under the radar without local residents, who are the people most impacted, being informed and given the chance to express their views.

It is difficult to understand how the site was chosen. It slopes steeply, has varying levels and the ground is very uneven. Due to the topography the site would not be straightforward to develop and may not even be viable. Sheffield City Council (SCC) will be aware of this as a topographical survey has been carried out on their behalf. These problems are compounded by the fact that there are already houses around most of the perimeter restricting the ability to level the site. This raises concerns that, if homes were built at the top of the slope, they would dominate those below.

The site also has drainage problems, possibly due to the whole area being riddled with underground streams. This is backed up by Main Modification 224 which states that a Level 2 Strategic Flood Risk Assessment is required. This is because the Level 1 FRA indicated that there is a risk of flooding. The site slopes steeply and gardens adjoining the lower side of the site are water logged after heavy rain. In winter they are so boggy that wellingtons are required! The vegetation and trees on the site currently soak up some of the excess water but it is still problematic. If the site were to be developed and the greenery replaced with hard surfaces and buildings this issue would be even worse.

The Facebook page for Birley Ward Labour Councillors has 2 videos (from 16/3/26) showing water flowing down the gennel next to the site. A pool of water has collected in the grass on the right which is on the edge of the site. This clearly demonstrates that water does not drain away.

Under the wildlife and countryside act 1981 special measures are needed to protect our wildlife no provision for these our protected wildlife appears to have been made having seen many wild are rare animals these special places WILL be lost . I have bulleted the animals seen over the last for years including this one where endangered species have been seen

- Tawny Owl (protected)
- frogs(protected)
- toads(protected)
- Kestrel
- Red Kites(protected)
- Buzzards(protected)
- Badgers(protected)
- field Mice
- Shrews(possibly)
- skylark(losing habitat and experiencing drastic decline)
- Red Deer(protected)
- bullfinch(protected)
- Hedgehogs(becoming rarer)
- mistleThrush
- Song Thrush
- butterflys (including orange tips peacocks tortoiseshell
- plus no doubt many other protected and rarer animals

The animals above need protecting and are present in SES13 you have a duty to protect these animals and forgo and building on areas of green parks . as stated this is a park having signs also photo evidence to show it Still is .

There is only one possible entry/exit point as the site is totally enclosed on all sides. The entry/exit is narrow and, as it is constrained on both sides, it cannot be widened. It adjoins a quiet side road on a small cul-de-sac which was not designed to take the volume of traffic that would be created by an additional 75 homes. Directly next to the entry/exit point is a gennel, leading from Jaunty Avenue to Fox Lane, which is used by school children going to and from Birley Academy. This clearly poses a serious Health & Safety risk as we all know how distracted young people can be! That risk would be heightened even more during the 2 year building phase when large lorries and trades vehicles would be regularly entering & exiting the site. Something which local councillors would wish to avoid, especially as they have recently publicised their involvement in a number of campaigns to improve road safety in the area.

Some time ago SCC classified the site as part of the Wildlife Corridor leading to Frecheville Heath and beyond. They were very proud of this and held meetings to publicise the benefits to local residents, which we attended. The site requires minimal management from SCC and is left to grow naturally. This initiative has been extremely successful and the site has become a vital green space for precious wildlife. We regularly see a huge variety of wildlife, some being protected species, including badgers (protected), bats (protected), foxes, frogs/toads & a variety of bird life including owls and birds of prey (some protected). Occasionally we also see deer and

pheasants. There are also a number of mature trees, which add to a sense of well-being, help to improve air quality and very importantly soak up excess water. We would therefore suggest that this is a very important, well established, thriving part of the wildlife corridor in which wildlife provision & Biodiversity must be maintained.

As with all areas that attract wildlife there are rats but they are currently not troublesome. However, if they were to be disturbed they would scatter and there is the risk that the adjoining estates of Basegreen and Frecheville would experience a rat infestation and the associated Health & Safety issues.

The site is part of Jaunty Park and has an official SCC sign at the entrance "Jaunty Park, A Local Park" (I have a photographic evidence of this). It is a sad day when SCC are selling off parks to be concreted over and built on & quite desperate, especially as they take pride in promoting Sheffield as "The UK's Greenest City". When we asked how this could be allowed to happen SCC said that the park was under-utilised. However, when asked how & when they had established this they did not reply to our Email. Our home backs onto the park and we can assure you that it is well used, especially by dog owners. It even appears on the Dogpack app which recommends good dog walking areas.

Based on a modest assumptions a development of 75 homes could bring at least 150 additional vehicles to the area. This would add to the congestion already experience daily on Fox Lane, Birley Lane, White Lane and at Gleadless Townend. It would also cause severe delays for Supertram because much of the tram route is shared with other road users so, when there is a traffic jam, the tram is held up too. Taking into account all the development proposed in the area, the roads would be gridlocked at busy times. They are already in a terrible state, particularly around the tram tracks and in parts they are unsafe. More vehicles would only make matters worse. Also air quality, which is already poor, would deteriorate even further affecting community health. The nearest bus service is infrequent and unreliable. Alternative bus services and the nearest tram stop are quite a distance away.

Planned development in the local area would create approximately 1,600 new homes (this figure does not include a potential 1,200 homes at Plumbley). SCC have earmarked a number of sites for development. On top of that NEDDC have highlighted sites at White Lane, Birley Lane and Ridgeway. This means that the population of the area will increase massively. However, there appear to be no confirmed plans for the provision of additional schools, GP surgeries or dental practices to meet the increased demand. Health provision in the area is already under considerable strain and this would put it under even more pressure. I recently had to wait nearly a month to see my GP and my partner had to wait 3 years to be taken on by a local dentist (that waiting list has since closed). A local primary school is already oversubscribed and South East Sheffield has no Post-16 education provision. If local schools were unable to cope with demand children would have to travel out of the area, increasing their carbon footprint and putting even more pressure on the already congested roads and public transport. Even if there were plans to provide additional schools, GP surgeries and dental practices we struggle to understand where there would be space for them as SCC have already had to resort to taking greenbelt and local park land just to provide the required number of homes.

The increased population will also put extra strain on the water supply and sewage services which are already struggling. Resident in the area regularly received messages

from the water company about supply problems such as low pressure.

Although this small site, SES13, may appear insignificant to those who are unfamiliar with it, for the reasons we have stated, it is very important to those who know the area well and there are so many reasons why it shouldn't be built on. On that basis it should never have been considered for development (had we been consulted we would have said that) and it should not have been included in the Sheffield Local Plan. We strongly believe that the plan should not be adopted until unsuitable sites are removed.

Please let us have your views on the issues we have raised. We would also like to know whether you are planning to vote for or against adopting the Sheffield Local Plan and your reasons for that decision. With local elections coming soon, this will help us to decide who to vote for.

We look forward to your reply.



Regards,

REF5.0109

Main Modification Sheffield Local Plan Site NES39 Wheel/Middleton Lane Objection

From JP [REDACTED]
Date Sat 2026-04-25 9:38 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[REDACTED]

Dear Strategic Planning Team,

I am writing to express my objection to the proposed Main Modifications to the Sheffield Local Plan, specifically in relation to Site NES39 land of Wheel lane and Middleton Lane.

I note that Parcels B and C have been removed from the plan on the basis that they are described as “particularly attractive” and that they “make a strong contribution to the character and setting of the local area,” with development likely to cause “significant landscape/visual harm.”

While this assessment is entirely valid for Parcels B and C, it applies equally to Parcel A. This land is home to endangered species and includes acid grassland, mature trees, historic hedgerows, and drystone walls dating back to the before the 1770s. In both ecological and landscape terms, Parcel A is just as “particularly attractive” and makes an equally strong contribution to the character of the area as the other parcels. Its development would likewise result in “significant landscape/visual harm.”

Development on Parcel A would significantly affect the “strong contribution to the character and setting of the local area.” The fields at NES39 function as a single, connected ecosystem, and cannot be considered in isolation. Development on one parcel will inevitably impact the others and would “cause significant landscape/visual harm” across the wider site. Furthermore, construction activity and its long-term effects are not contained within a single field. Given the natural eastward slope of Parcel A, surface runoff would drain into Parcels B and C, described as “open fields sloping down to a river valley.” This creates a clear risk that both the fields and the river valley would be adversely affected by pollution resulting from the development.

Endangered species, including bats, woodpeckers, curlew, adders, hedgehogs and greenfinches, among many others all depend on this land as their habitat. What specific assessments and safeguards have been put in place to ensure these species are protected during any proposed development?

It is not enough just to say “the Golden Rules apply”. If the Council is relying on those rules to justify Green Belt release, it should show clearly what they mean in practice for these sites and how they can actually be delivered.

The Council’s own appraisal says the Main Modifications make the Plan worse for soil and land, landscape, biodiversity and transport. That is not my claim - it is in the Council’s own IIA.

These are not minor tidying-up changes. The Council’s own consultants say the Main Mods were significant enough to need further appraisal because they change the spatial strategy, release Green Belt, and additional school, burial and habitat-related consequences.

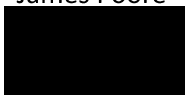
The release of Green Belt land is not necessary. The Save Chapeltown, Ecclesfield and Grenoside Green Belt campaign group has conducted a review of brownfield sites across Sheffield and identified a substantial number of viable alternatives for housing and warehouse development (see Exam 141). This evidence demonstrates that sufficient capacity exists within brownfield land to meet the requirements of the Sheffield Local Plan, without the need to develop Green Belt sites.

Exam 141 - https://d282b3ca-4277-4cc4-942b-3aeaef3043d5.filesusr.com/ugd/4446b7_30899ea20da14cc6a24f6225f189c0a7.pdf

In conclusion, the release of Green Belt land in Sheffield is not necessary, and there is clear evidence to support this. There is a strong and growing community committed to protecting this protected land, and we urge the Council and developers to prioritise the use of brownfield sites first. The key question remains: will the Council listen to the people of Sheffield and act to preserve the Green Belt, or risk repeating history such as the street trees campaign?

Yours faithfully,


James Poore



REF5.0110

SES30 Representation

From Andrew Linfoot [REDACTED]
Date Sat 2026-04-25 11:57 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

 1 attachment (213 KB)
ses30_representation_2.pdf;

External email

To Whom It May concern,

Please find attached my representation against the Sheffield Plan.

I have attached a PDF document, if this is unreadable or corrupt please let me know ASAP so i can send in a format that you can read.

Regards
Andrew Linfoot

SHEFFIELD PLAN EXAMINATION

Main Modifications Consultation

Representation on Main Modification MM411 — Site Allocation SES30

Submitted by: Andrew Linfoot

Address: [REDACTED]

Email: [REDACTED]

Date: 25th April 2026

Consultation reference: MM411 / SES30

1. Introduction and Scope

1.1 This representation is submitted in response to the Main Modifications consultation on the Sheffield Plan. It relates specifically to Main Modification MM411 — the proposed allocation of site SES30, Land between Bramley Lane and Beaver Hill Road, Handsworth, for 827 dwellings together with land safeguarded for a secondary school and a multi-faith burial ground.

1.2 This representation does not challenge the principle of the allocation itself, which has been determined by the Inspectors. It argues that MM411, as currently drafted, is **unsound** because it is neither justified nor effective in respect of its highway conditions. Specifically:

- The highway conditions in MM411 do not resolve — and explicitly defer — the question of transport assessment for all roads adjacent to the site.
- No transport assessment has been completed for Bramley Lane, Sundown Road or Richworth Road, all three of which physically border the site.
- MM411 contains no condition restricting vehicular access from Bramley Lane, Sundown Road or Richworth Road, in contrast to the explicit restriction applied to Carter Hall Lane in the comparable site allocation SS19 elsewhere in the same modifications schedule.
- Independent traffic monitoring data collected by the author over 41 days demonstrates that Bramley Lane is already operating with persistent and severe speed limit non-compliance, making it unfit to serve additional development traffic without prior assessment and physical improvement.

1.3 The representation requests a specific main modification to MM411 to resolve the access position for Bramley Lane, Sundown Road and Richworth Road before the plan is adopted, consistent with the approach already taken for other access roads in the same modifications schedule.

2. The Highway Conditions in MM411: Analysis

2.1 The access condition as drafted

2.1.1 The highway conditions in MM411 state, in their entirety, as follows in respect of access:

“Subject to further transport assessment, access to the highways is required off Beaver Hill Road.”

“Highways improvements to the Retford Road / Beaver Hill Road junction, identified within the Infrastructure Delivery Plan, will be required.”

“Contributions may be required to highways improvements at junctions on the

strategic and local road network.”

2.1.2 To understand the significance of these conditions it is necessary to consider the physical geography of the site. SES30 is a 35-hectare site bounded on its eastern edge by Beaver Hill Road (B6066) — the only road named in MM411 — and on its western and southern edges by three further roads: Bramley Lane, which runs along the western boundary and forms part of the site’s own name and address; Sundown Road, which runs along the north-western edge of the site connecting to Bramley Lane; and Richworth Road, which traverses the south-western portion of the site boundary. All three roads provide direct connections to the residential areas of Handsworth and Woodhouse to the west and south-west, and all three are entirely absent from the highway conditions in MM411.

2.1.3 It is not credible that 827 dwellings, a secondary school and a burial ground — generating thousands of daily vehicle movements — could be constructed on land that physically adjoins three roads without those roads being used for access by at least some residents, visitors and construction traffic. The site’s own title acknowledges the relationship with Bramley Lane. The suggestion that all traffic from a development of this scale will use Beaver Hill Road exclusively, with no pressure on any of the three roads forming the western and southern boundaries, is implausible as a matter of physical geography and human behaviour. The question is not whether these roads will be used — they will — but whether the plan is sound in failing to assess and address that use.

2.1.4 These conditions, taken together, have three critical deficiencies. First, the transport assessment is explicitly deferred — “subject to further transport assessment” means that no completed assessment underpins the access strategy. Second, the only named junction improvement (Retford Road / Beaver Hill Road) is acknowledged in the Council’s own evidence to operate at 98% capacity after mitigation. Third, and most significantly, there is no reference whatsoever to Bramley Lane, Sundown Road or Richworth Road, all three of which directly adjoin the site boundary.

2.2 The SS19 precedent: the Council knows how to restrict access

2.2.1 Elsewhere in the same modifications schedule, Main Modification MM429 for site allocation SS19 (White Lane, Gleadless Townend) contains the following condition:

“Subject to further transport assessment work, access to the highway will be required from White Lane only. Access from Carter Hall Lane will be limited to pedestrian/cycle and emergency access only.”

2.2.2 This demonstrates that where the Council intends to restrict vehicular access from a named road, it does so explicitly and unambiguously within the modification itself. The condition for SS19 names the restricted road and specifies the permitted use (pedestrian/cycle and emergency only).

2.2.3 No equivalent condition appears in MM411. Bramley Lane — which appears in the site’s own address and title — and Sundown Road are not mentioned at all. The Council’s position that there will be no vehicular access from these roads, if that is indeed its position, is therefore entirely absent from the plan policy. The absence is not a minor omission: it means the restriction is unenforceable.

2.3 The logical fork: either outcome makes MM411 unsound

2.3.1 The current drafting of MM411 creates an unavoidable logical dilemma. There are only two possible positions on Bramley Lane, Sundown Road and Richworth Road access, and MM411 is unsound under either:

Position A: The Council intends to restrict access from Bramley Lane, Sundown Road and Richworth Road

If this is the Council's intention, MM411 is **ineffective** because the restriction is not stated. The SS19 precedent demonstrates what an effective restriction looks like. MM411 contains no equivalent wording. A policy intention that is not expressed in the plan policy cannot be enforced at planning application stage. The plan is not effective.

Position B: Vehicular access from Bramley Lane, Sundown Road and/or Richworth Road is possible

If access via these roads is not restricted, then the highway impact on both roads must be assessed and mitigated before the plan is adopted. MM411 contains no transport assessment for these roads and no identified improvement schedule. The independent monitoring evidence set out in Section 3 below demonstrates that Bramley Lane is already severely non-compliant with its speed limit. The plan is neither **justified** (no evidence base for these roads) nor **effective** (no mechanism to secure improvements).

2.3.2 Given that the site physically abuts both roads, and given that 827 dwellings together with a school and a burial ground will generate substantial traffic movements, it is not credible that no resident or visitor will ever use Bramley Lane, Sundown Road or Richworth Road for access regardless of the plan's intention. The practical reality is that without physical infrastructure preventing it — not merely a policy aspiration — residents will use the most convenient available route. A plan that allocates 827 dwellings adjacent to three roads without either assessing their capacity or explicitly and enforceably restricting their use is not sound.

3. Independent Traffic Monitoring Evidence: Bramley Lane

3.1 Methodology

3.1.1 In direct response to the absence of any transport assessment for Bramley Lane in the Council's evidence base, the author established an independent continuous traffic monitoring system on Bramley Lane in March 2026. The system uses two Reolink TrackMix cameras with automated computer vision object detection (Frigate NVR), recording all vehicle and pedestrian movements 24 hours a day.

3.1.2 Vehicle speeds are recorded when a vehicle passes through a defined speed measurement zone. Speeds are expressed in miles per hour. The monitoring equipment consists of mid-range consumer surveillance cameras operating automated computer vision object detection. As with all camera-based traffic monitoring, the system is subject to environmental factors including reduced visibility in rain, fog or mist, and adverse sun angles at certain times of day. These conditions may cause some vehicles to go undetected or produce unreliable speed estimates. As a result, the dataset is likely to under-record the total number of vehicles and may under-represent extreme speeds. Accordingly, the statistical analysis in this representation is limited to readings at or below 40 mph, which represents the reliable operating range of the equipment under normal conditions. The figures presented below are therefore a conservative understatement of actual conditions.

3.1.3 Data was collected continuously from 16 March 2026 to 25 April 2026, a period of 41 days and 22,685 individual speed readings. The Sheffield City Council approved school calendar for 2025/26 confirms the Easter holiday ran from 28 March to 13 April 2026, with return to school on 14 April. The monitoring dataset therefore covers two term-time periods — 16 to 27 March (pre-Easter) and 14 to 25 April (post-Easter) — separated by the 17-day Easter holiday. The holiday data represents a more favourable baseline with lower traffic volumes and no school-run activity, meaning non-compliance figures during that period are a conservative lower bound for normal term-time conditions.

3.2 Summary statistics

3.2.1 The monitoring data demonstrates persistent and severe non-compliance with the 20 mph speed limit on Bramley Lane throughout the entire monitoring period. The key statistics, separately by period, are as follows:

3.2.2 In highway engineering, the 85th percentile speed (P85) is the standard measure used to assess operating speeds and inform speed limit policy: it represents the speed at or below which 85% of vehicles travel. Based on the cumulative speed distribution derived from the monitoring data, the P85 speed on Bramley Lane during the pre-Easter term-time period (16–27 March) is above 40 mph — meaning that fewer than 15% of drivers travel at or below the speed limit. During the Easter holiday (28 March–13 April) the P85 is approximately 38 mph, and during the post-Easter term-time period (14–25 April) approximately 35 mph. Across the full 41-day monitoring period the P85 is approximately 39 mph. All of these figures substantially exceed the posted speed limit of 20 mph and are at a level where road design guidance would indicate a need for physical traffic calming measures.

Metric	Term time 16–27 Mar	Easter holiday 28 Mar–13 Apr	Term time 14–25 Apr	Full period 41 days
Speed readings	5,616	9,269	7,800	22,685
Weighted mean speed	30.6 mph	22.5 mph	19.0 mph	23.3 mph
Exceeding 20 mph limit	66.8%	48.8%	36.8%	49.1%
Exceeding 30 mph	46.3%	34.4%	24.2%	33.8%
Exceeding 40 mph (double limit)	27.2%	9.1%	3.9%	11.8%
Days with any >40 mph reading	12 of 12	17 of 17	12 of 12	41 of 41
85th percentile speed (P85)	>40 mph	~38 mph	~35 mph	~39 mph

3.2.3 It is also relevant to note that Bramley Lane serves as an access route on foot and by car for existing schools in the area, including Ballifield Primary School and Handsworth Grange Community Sports College, neither of which has direct vehicular access from Bramley Lane itself. Parents and carers travelling to these schools by car must park on surrounding roads including Bramley Lane and the adjacent residential streets, generating significant on-street activity during morning drop-off and afternoon collection. This existing school-related traffic is already embedded in the monitoring data presented here. The proposed secondary school within SES30, if delivered, would add materially to this existing pressure at the same times of day.

3.3 The significance of speeds exceeding 40 mph

3.3.1 Particular attention is drawn to the proportion of vehicles recorded at speeds exceeding 40 mph — double the posted speed limit. This is not a rounding artifact or occasional aberration. During the pre-Easter term time, more than one in four vehicles (27.2%) was recorded travelling at double the speed limit. Even during the Easter holiday period, with substantially reduced traffic volumes and no school-run activity, vehicles exceeding 40 mph were recorded on **every single one of the 17 holiday days without exception**.

3.3.2 On the busiest holiday days (late March to early April), between 47 and 73 individual vehicles per day were recorded exceeding 40 mph on a road with a 20 mph limit. This is structural behaviour, not isolated incidents. It reflects the physical character of Bramley Lane

— its geometry, gradient, and absence of traffic calming — which induces high speeds regardless of the legal limit.

3.3.3 As all figures are derived from readings capped at 40 mph, they are conservative estimates. The actual proportion of vehicles exceeding 40 mph, and the actual mean and P85 speeds, are likely to be higher than the figures presented here.

3.4 Term time versus holiday: the development impact

3.4.1 The monitoring dataset covers two term-time periods — pre-Easter (16–27 March) and post-Easter (14–25 April) — separated by the Easter holiday. Both term-time periods show materially higher non-compliance than the holiday period, confirming that elevated speeds are driven by normal traffic patterns. The 827 dwellings and secondary school proposed for SES30 will generate traffic closely resembling term-time conditions: commuter trips, school runs, and peak-hour movements. The pre-Easter term-time figures — mean speed 30.6 mph, 66.8% non-compliance, 27.2% exceeding 40 mph — represent the more established pattern and the appropriate baseline for assessing development impact.

3.4.2 The Easter holiday period shows lower figures across all metrics, as expected with reduced volumes and no school-run activity. The post-Easter term-time data shows figures between the two periods, consistent with the early stage of the summer term. Across all three periods, however, non-compliance was recorded every day without exception, and vehicles exceeding 40 mph were recorded on all 41 monitoring days. This confirms that speed limit non-compliance on Bramley Lane is a persistent structural characteristic of the road, not an occasional or seasonal phenomenon.

3.5 Daily data table

3.5.1 The full day-by-day dataset is set out below. All figures are based on speed readings at or below 40 mph. The table is divided into three sections by period: pre-Easter term time, Easter holiday, and post-Easter term time.

Date	Readings	Mean mph	>20 mph %	>30 mph %	>40 mph %
Term time — 16 to 27 March 2026					
16 Mar	692	30.6	65.8%	45.7%	31.1%
17 Mar	584	33.5	72.8%	55.7%	37.5%
18 Mar	552	35.9	75.9%	62.1%	43.1%
19 Mar	602	27.2	59.3%	35.5%	18.9%
20 Mar	468	27.3	60.5%	34.6%	18.4%
21 Mar	495	29.5	63.2%	39.0%	22.6%
22 Mar	357	30.4	64.7%	40.9%	25.8%
23 Mar	354	36.3	76.8%	61.0%	37.0%
24 Mar	289	37.1	83.4%	64.0%	37.7%
25 Mar	348	31.2	69.5%	49.4%	29.0%
26 Mar	306	27.6	61.4%	40.8%	19.3%
27 Mar	569	24.0	56.8%	35.9%	8.6%
Easter holiday — 28 March to 13 April 2026					
28 Mar	525	24.1	58.7%	38.3%	9.3%
29 Mar	478	23.3	52.3%	36.4%	10.5%
30 Mar	603	23.0	49.6%	34.7%	9.1%
31 Mar	594	23.2	48.8%	36.2%	12.3%
01 Apr	557	23.3	49.9%	37.2%	11.1%
02 Apr	638	23.0	50.3%	36.1%	10.2%
03 Apr	536	23.4	51.7%	36.2%	11.9%
04 Apr	480	23.9	52.1%	39.2%	12.7%
05 Apr	380	22.1	46.6%	33.2%	8.4%
06 Apr	471	24.1	53.3%	39.3%	10.0%
07 Apr	522	22.1	46.4%	31.6%	10.5%
08 Apr	511	23.4	54.2%	35.8%	9.2%
09 Apr	537	24.4	56.4%	41.5%	11.4%
10 Apr	656	22.3	49.5%	33.5%	9.0%
11 Apr	599	18.5	35.4%	23.4%	2.3%
12 Apr	533	19.8	40.5%	28.7%	4.3%
13 Apr	649	19.5	38.4%	26.5%	4.0%
Term time — 14 to 25 April 2026					
14 Apr	651	18.9	36.7%	25.2%	3.2%
15 Apr	701	18.2	34.4%	21.8%	4.0%
16 Apr	708	19.1	36.0%	24.6%	4.1%
17 Apr	711	18.3	35.3%	23.6%	2.4%

Date	Readings	Mean mph	>20 mph %	>30 mph %	>40 mph %
18 Apr	654	18.7	37.2%	22.9%	2.9%
19 Apr	527	19.7	38.3%	24.9%	7.0%
20 Apr	678	19.5	37.9%	26.8%	3.1%
21 Apr	667	20.1	39.3%	26.8%	6.1%
22 Apr	417	20.1	41.0%	26.4%	5.5%
23 Apr	720	19.2	36.0%	26.3%	4.3%
24 Apr	697	18.0	34.0%	20.7%	3.3%
25 Apr	669	18.7	38.4%	21.2%	2.2%

4. The Soundness Case

4.1 MM411 is not justified

4.1.1 NPPF paragraph 35 requires a plan to be justified — meaning that it is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. The transport evidence base for MM411 does not include any assessment of Bramley Lane, Sundown Road or Richworth Road. The access condition itself acknowledges this by deferring the matter: “subject to further transport assessment” is an explicit admission that the evidence has not been gathered.

4.1.2 Independent monitoring data now exists — 22,685 readings over 41 days — that should have formed part of the transport evidence base. It demonstrates conditions on Bramley Lane that are materially relevant to whether the access strategy for SES30 is sound. A plan cannot be justified by evidence that has not been gathered, particularly when the gap in the evidence base has been independently identified and partially filled by a member of the public.

4.2 MM411 is not effective

4.2.1 A plan is effective where it is deliverable over the plan period. Highway conditions that are deferred to planning application stage — without an identified schedule of improvements, without a confirmed funding mechanism, and without enforceable triggers — cannot be shown to be deliverable. The phrase “contributions may be required” (emphasis added) is particularly weak: it does not require anything. It creates no certainty that any improvement to any road will be secured before development proceeds.

4.2.2 The SS19 precedent is instructive on what effectiveness looks like. That modification names the restricted road, specifies the nature of the restriction, and provides a clear basis for enforcement at planning application stage. MM411 does neither for Bramley Lane, Sundown Road or Richworth Road. The contrast within the same modifications schedule undermines any argument that the current MM411 wording is sufficient.

4.3 MM411 is inconsistent with national policy

4.3.1 NPPF paragraph 115 requires that development should only be prevented on highway grounds where the residual cumulative impacts are severe. This cuts both ways: the same policy framework that restricts refusal of development on undemonstrated highway grounds equally prevents the allocation of sites for major development where the highway impact has not been assessed. The Council cannot rely on NPPF paragraph 115 to approve future planning applications on this site whilst simultaneously declining to assess the highways impact at plan-making stage.

5. Requested Modification

5.1 This representation requests that the highway conditions in MM411 be amended to add the following conditions, consistent with the approach taken in MM429 (SS19) and proportionate to the independently evidenced existing conditions on Bramley Lane:

Option A (if access restriction is intended):

“Vehicular access from Bramley Lane, Sundown Road and Richworth Road will be limited to pedestrian/cycle and emergency access only. Physical measures to prevent general vehicular access from these roads shall be identified through the masterplanning of the site and secured prior to the commencement of any residential development.”

Option B (if access via these roads is not excluded):

“A Transport Assessment of Bramley Lane, Sundown Road and Richworth Road shall be completed and submitted as part of the first planning application for the site. The Assessment shall address existing traffic volumes, vehicle speeds, pedestrian safety, junction capacity and the cumulative impact of the proposed development. No residential development accessed via Bramley Lane, Sundown Road or Richworth Road shall commence until all highway improvements identified in the Assessment have been secured by planning condition or legal agreement and delivered.”

5.2 Either option would address the soundness deficiency. Option A reflects the Council's stated position (if it has one) and follows the SS19 precedent exactly. Option B provides an evidence-based pathway to development where access via these roads may be permitted, but only after the highway impact has been properly assessed and improvements secured. The current MM411 wording achieves neither.

6. Conclusion

6.1 Main Modification MM411 is unsound in its current form. The highway conditions as drafted fail to address the access position for Bramley Lane, Sundown Road and Richworth Road — two roads that physically bound the site and are not mentioned in the modification at all. This omission is directly inconsistent with the Council's own approach in MM429 (SS19), where a comparable restriction was stated explicitly.

6.2 Independent traffic monitoring data collected over 41 days and 22,685 speed readings demonstrates that Bramley Lane is already severely non-compliant with its 20 mph speed limit. During normal term-time conditions, which most closely represent the conditions that will prevail once the site is occupied, two thirds of all vehicles exceed the speed limit and more than one in four exceeds 40 mph. Even during the Easter school holiday, non-compliance was recorded on every single day without exception, and vehicles exceeding 40 mph were recorded throughout the entire monitoring period.

6.3 The modifications schedule must address this gap. A plan that allocates 827 dwellings, a secondary school and a burial ground on land adjacent to roads with these existing conditions, without either assessing the impact or enforceably restricting access, is not justified, not effective, and not consistent with national policy. The requested modification is modest, targeted, and directly consistent with the approach the Council has itself taken for other sites in the same consultation document.

I consider Main Modification MM411 (site SES30) to be unsound. It is not justified and not effective in respect of its highway conditions. I request that the modification be amended to resolve the access position for Bramley Lane, Sundown Road and Richworth Road as set out in Section 5 above.

I request to be notified of the Inspectors' final report and the adoption of the Sheffield Plan.

Andrew Linfoot

[REDACTED]
[REDACTED]

REF5.0111

HAVE YOUR SAY - Submission to Recent Modifications by 5th May

From Susan Day [REDACTED]
Date Sun 2026-04-26 10:22 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

 1 attachment (713 KB)

Main Modification Comments5th May.docx;

External email

Sir/Madam

I refer to the continued Sheffield Local Plan and recent released modifications, to which please find attached myself and my husband comments dated today Sunday 26th April 2026

In due course, we expect to receive a confirmation & reference number to this.



Virus-free. www.avg.com

30th April 2026

Sheffieldplan@sheffield.gov.uk

Sirs/Madam

I find myself spending huge amounts of time once again, having to wade through copious amounts of documentation for this DREADFUL LOCAL PLAN being put forward by Sheffield City Council. Living in the area of S35 we cannot believe what the council is trying to do to the populous of this suburb.

We are an elderly couple who [REDACTED] THE SITE CH03 Land Bordered by M1, Thorncliffe Road, so you will not be remotely interested regarding the worry that faces us, as the consequences of the damage to the health and wellbeing of the residents in this immediate locality and moreover possibly to the whole of S35 in conjunction with CH04

The area around S35 2YA (Chapelton, Sheffield) was historically a hub of intense coal and iron mining, particularly managed by the [Newton Chambers Company](#). While deeper shafts like Thorncliffe Main were significant, the area was heavily worked by small drift mines and adits—**sloped tunnels allowing miners to walk directly into the coal seam**, which were typical in the 19th and early 20th centuries.

The lack of consideration of allowing any disturbance by the proposals to these sites for over 80 years + and how it could impact on EVERY SINGLE RESIDENT who also reside in the S35 suburb. To this end I have to concentrate my representation on this, as there is no doubt how this, including any suggested mitigation measures could still severely impact everyone. This SITE CH03 should NEVER have even been considered and I therefore refer to the:

Main Modification Schedule includes Insertion of Annex C – March 2026 Monitoring - Framework contains worded OBJECTIVES within the proposed Policies:

“To develop the city in ways which improve the health and wellbeing of all Sheffield’s residents, and which reduce health inequalities”

“To make Sheffield net zero carbon by 2030”

“To locate new development where it minimises the distances that people and goods need to travel, by mixing land uses to increase opportunities for people to make single journeys that serve several purposes”

“provide excellent opportunities for outdoor recreation; improve health and well-being; protect and enhance biodiversity; and mitigate climate change”

Just a few chosen statements extracted from that document, which literally fly in the face of what will happen if these strategic sites are chosen.

Integrated Impact Assessment – Non Technical Summary AECOM update

This intense document is obviously above the heads of the typical resident in S35, but certain elements of it make for extremely distressing reading and I am prepared as a [REDACTED] local resident to try to comment

SO I SET DOWN MY COMMENTS TO SAY THIS:

It would appear that AECOM state the PLAN overall will perform better in some areas but much less well in relation to others within the various topics/sub headings and the evidence based IMPLICATIONS:

Modifications Relating to Spatial Strategy for Employment –

Para 4.3.9 covers the 4 sites for proposed development as believe these are the best deliverable locations for both employment and due to the M1 locality

para.4.3.10 due to being close to a railway station and bus services

The subsequent appraisals as stated in the AECOM follow under Section 5

Topic 1 Economy – there are no comments from myself

Topic 2 Housing – there are no comments from myself

Topic 3 Health & Wellbeing – things now begin to deteriorate and make for distressing reading with the following extracts:

5.5.5 Further employment growth mostly involves strategic sites along the M1 for industrial, warehousing and distribution uses. There is potential for such development to have short-term adverse impacts on air quality and longer-term impacts on noise and visual amenity through increased traffic and HGV trips to and from the development of large industrial buildings. This is likely to have some residual **'minor negative impacts'** on the amenity and health of existing nearby communities. On the contrary, some of these locations are in proximity to areas with high levels of deprivation and new employment should provide job opportunities for nearby communities

My Reply: Short term adverse impacts on AQ – WHY ONLY DURING DEVELOPMENT. Minor negative impacts – amenity & health obviously not important and proximity to high levels of deprivation - (reference relates to S5 and not S35 (we are NOT DEPRIVED in this locality)

Topic 4 Transport & Accessibility

5.6.3 The additional employment sites benefit from good strategic road access due to their proximity to the M1 and adjoining A-roads (ALREADY CONGESTED) which *should help* facilitate their proposed industrial, warehousing and distribution uses (including retail use at Land at Meadowhall Way) and reduce HGV travel distances from the strategic road network. **Nevertheless, overall growth is expected to exacerbate congestion through increased vehicle movements. Site allocation policies require improvements to the road network where appropriate.**

My Reply: *NO sound evidence as how the road improvements can be achieved* – it never will be viable as you cannot change what is here with existing road network.

Despite being relatively close to Chapeltown Railway Station compared to alternative sites that were considered, opportunities to support a shift towards public transport and active travel are typically limited for employment sites in the north of Sheffield due to infrequent bus services, distance from rail and tram stops, challenging topography, and constraints in providing direct links to existing walking and cycling routes, including the Blackburn Valley Trail.

My Reply: The final underlined statement confirms the difficulties that exist due to the extremely high steep gradient of White Lane

Topic 5 - Soil & Land

5.7.2 With regards to agricultural land, a mix of grades are likely to be affected. Several of the sites fall within land categorised (provisionally) as urban or grade 4 land, whilst approximately 80 ha of land is identified as Grade 3. It is unclear at this stage whether this land is best and most versatile land (i.e. Grade 3a rather than 3b). Regardless of the outcome of detailed soil surveys, ***large areas of greenfield land will be lost, and the ability of the remaining soils to provide ecosystem services will be affected.*** In this respect, **cumulative negative effects are predicted**, which offset the positive effects related to urban regeneration efforts. This leads to residual neutral effects.

5.7.3 Several modifications are aimed at improved flood risk management, which is likely to have some minor secondary effects with regards to soil function. However, these effects are not predicted to be significant.

Topic 6 – Heritage - CH03 does not apply to this site here for my comments

Topic 7 – Townscape & Landscape

5.9.3 **Development at Warren Lane (CH03) would introduce a more sporadic and visually prominent form of development into the surrounding countryside. Steeply sloping land and longer-distance views increase the site's visibility, intensifying effects on landscape character.** While there is some scope to introduce new landscape features (as required by the accompanying site policy), the scale and form of likely employment development **could limit effective mitigation.**

5.9.12 **Overall, the modifications are predicted to derive predominantly negative effects, particularly from the allocation of the Green Belt sites where development would reduce openness, alter landscape character and be difficult to fully mitigate due to scale, topography and visibility, compared to the Submission Plan**

My Reply – the document itself in both these above paragraphs, confirm the total negative impacts to the precious landscapes

Topic 8 - Biodiversity

5.10.8 Several of the additional residential site allocations are adjacent to priority habitats (mostly deciduous woodland) and therefore present the potential for **direct negative effects on associated species during construction and operations**. The accompanying site condition policies require buffer zones between ecological sites / features and there will be a need to implement biodiversity net gain (**on site in the first instance**) and to maintain ecological **connectivity**. These conditions also apply to all remaining site allocations proposed at the submission Plan.

5.10.9 These measures should reduce negative effects somewhat, but it is possible that some **minor negative effects would remain that are difficult to fully mitigate** (for example, increased recreational pressure, predation from domestic cats and noise and light disturbance)

My Reply: Negative effects on ALL species will become *PERMANENT* and simply not just at the construction and operations stage – as if all will return to as before

Topic 9 – Climate Change & Resilience

5.11.4 - A number of the additional site allocations contain areas of land at risk of flooding, including from fluvial and surface water risks. Mitigation has been considered via the Strategic Flood Risk Assessment and site-specific allocation conditions that ensure, for example, that areas within the **additional Green Belt sites that remain at risk of flooding will not be developed** –

My Reply - I recall reading that attenuation tanks could be utilised up here on the higher ground of CH03 to hold back possibly large amounts of rainfall as the land due to disturbance could have extenuating circumstances for the lower lying land in Chapeltown causing dangerous flooding levels to business and residential properties as the obvious climate changes will impact

Topic 10 – Resources & Pollution

5.12.1 With regards to air quality, the additional site allocations are in a mix of locations with varying accessibility. Whilst some of the locations are well

located in relation to public transport networks, **there will still be an increase in car trips, particularly to the more peripheral locations. (CH03)**

5.12.2 **The employment allocations will also lead to increased traffic**, though this would likely be restricted to the strategic road network for business operations. Overall, it is predicted that there will be some increased pressures in terms of air quality, but the dispersed nature of site allocations should mean that **air quality in central locations does not deteriorate significantly**

My Reply – The area ALREADY CAN EXPERIENCE SOMEDAYS OVER 3 TIMES ACCEPTABLE LEVELS) and this is on certain strategic roads.

5.12.3 With regards to land contamination, several of the additional sites have been identified as **potentially being contaminated and / or being within 250m of a historic landfill site. The accompanying site policies all require that contamination is explored and remediated, and that land conditions are safe.** This will help to improve the quality of land and reduce future environmental pollution risks from these sources.

My Reply -HOW CAN THIS BE EVEN CONSIDERED TOTALLY SAFE? DISTURBANCE OF LAND WITH THE LEVELS OF CONTAMINATION FROM THE LEGACY OF MINING IS SO DANGEROUS, AND IS WHY THESE SITES WERE LEFT TO NATURE WHEN MINING ACTIVITIES CEASED.

Topic 11 – Climate Change

5.13.7 In **terms of employment land**, the types of uses supported **will likely generate an increase in HGV and LGV trips, as well as local workforce** generated trips. **This is likely to increase emissions.** The standard of employment premises would likely be high quality to meet modern needs though, and per capita emissions from the built environment ought to improve in this respect????

My Reply: Reckon that this is an understatement and will be a definite fact – Assume not important due to being employment premises – but what exactly does that imply – “capita emissions will improve”

5.13.9 Overall, an increase in housing and employment land is likely to have neutral effects (with some caveats).

IN SUMMARY – There are so many worries shown above, which we can see from the councils own appraisal does point out that many of the important categories as listed above do not make for good reading.

How can any of this be justified as there is no proportionate evidence – the environment and humans WILL BE HARMED and as a resident we have to challenge whether this trade off is truly acceptable ??

“Golden Rules” - represent a vague addition – simply stating the sites were formerly Greenbelt so these “rules” apply, is just too broad a statement and each site, not attempting to define exactly what is required, showing what that CLEARLY means in practice, going forward into actual delivery. Following such devastating impacts over the next 15 years, once this greenbelt is removed and subsequently destroyed, we can never get it back!!!!

The Main Modifications are just too “loose” regarding any real benefits and more specific mitigation measures should have been incorporated. It really is insufficient to state these ‘measures’ will need to be provided at the planning stage. There is no clear reference to the crucial infrastructure which has to be a ‘central pillar to the success of the plan’ and needs to be put in place prior to any development.

Examples of this are space for schools and burial ground, additional healthcare provision, stronger flood risk in an area that is already overstretched and potential contamination dangers.

Congestion is regularly experienced and further allowances for bringing yet more traffic particularly HGVs is simply a disaster waiting to happen with potential dangerous health implications, particularly on air quality deterioration for the residents .

Ironic in a city that has developed a Clean Air Zone for the central city centre but has NO provision whatsoever for suburban areas.

Switching attention for the Habitat Regulation Assessment which dares to state no overall adverse affect - BUT THIS IS BASED ON MITIGATION measures that have not yet been fully provided and it is obvious that severe irrevocable damage will be done to precious ancient woodland and a plethora of wildlife.

It is total twaddle that it states there will be no further increase in air pollution and traffic numbers – this is just words on paper and not hard evidence !!

Construction ‘WILL NO DOUBT’ disturb habitats **with certain employment sites causing more permanent ecological impacts that are harder to mitigate fully. The mitigation needs to be specific AND credible**

In summing up - Is all this really viable, CAN it even be delivered? – These Modifications still appear to not make for an evidential plan that is SOUND, NOR JUSTIFIED and certainly how can it be EFFECTIVE without real supporting evidence.....

This is seen in AECOM’s own documented words:

“However, these benefits come with trade-offs. The Modified Plan relies on the release of Green Belt land, which leads to permanent losses of greenfield areas and reduces the quality and natural function of soils. For this reason, **the positive effects expected under the Submission Plan**, which was more significantly brownfield focussed, **are reduced to a neutral outcome.**

The **landscape and townscape implications are also more negative**. Several of the new sites to be released from Green Belt lie in locations where development is likely to affect long-distance views, reduce openness and narrow the gaps between settlements. This results in **new, moderate negative effects that were not present before.**

Biodiversity is similarly affected. While policy measures and site-specific safeguards help to limit harm, the introduction of several new sites—some adjacent to priority habitats or affecting the edges of wildlife areas—means that the **Modified Plan has slightly worse outcomes** than the Submission version.

BUT WHAT DO WE KNOW ??? WOULD YOU AND ANY INDIVIDUAL LIKE THE THOUGHTS OF THIS NEAR TO YOUR OWN PERSONAL LIVING ENVIRONMENT

SHAME ON ALL OF IT..... Sheffield City Council

Signed by: **Susan and Michael Housley**



This is nature at its best – greenbelt not employment !



REF5.0112

Main Modification Sheffield Local Plan Site NES39 Wheel/Middleton Lane Objection

From Jessica Doncaster [REDACTED]
Date Sun 2026-04-26 12:05 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

 5 attachments (5 MB)

7e8d05e9-7f4a-4763-a9a9-54a8bc3e9b51.jpeg; 1ffd1951-77a3-4693-8d6f-ba57cb51417e.jpeg; IMG_2944.jpeg; 7f7da3eb-eeb8-4353-80b8-c63c6a049662.jpeg; IMG_6874.jpeg;

External email

Dear Strategic Planning Team,

I am writing to express my objection to the proposed Main Modifications to the Sheffield Local Plan, specifically in relation to Site NES39 land of Wheel Lane and Middleton Lane.

I note that Parcels B and C have been removed from the plan on the basis that they are described as "particularly attractive" and that they "make a strong contribution to the character and setting of the local area," with development likely to cause "significant landscape/visual harm."

While this assessment is entirely valid for Parcels B and C, it applies equally to Parcel A. [REDACTED] [REDACTED] which is home to endangered species and includes acid grassland, mature trees, historic hedgerows, and drystone walls dating back to before 1770s. In both ecological and landscape terms, Parcel A is just as "particularly attractive" and makes an equally strong contribution to the character of the area as the other parcels. Its development would likewise result in "significant landscape/visual harm."

Development on Parcel A would significantly affect the "strong contribution to the character and setting of the local area." The fields at NES39 function as a single, connected ecosystem, and cannot be considered in isolation. Development on one parcel will inevitably impact the others and would "cause significant landscape/visual harm" across the wider site. Furthermore, construction activity and its long-term effects are not contained within a single field. Given the natural eastward slope of Parcel A, surface runoff would drain into Parcels B and C, described as "open fields sloping down to a river valley." This creates a clear risk that both the fields and the river valley would be adversely affected by pollution resulting from the development.

Endangered species, including bats, woodpeckers, curlew, adders, hedgehogs and greenfinches, among many others all depend on this land as their habitat. What specific assessments and safeguards have been put in place to ensure these species are protected during any proposed development?

It is not enough just to say "the Golden Rules apply". If the Council is relying on those rules to justify Green Belt release, it should show clearly what they mean in practice for these sites and how they can actually be delivered.

The Council's own appraisal says the Main Modifications make the Plan worse for soil and land, landscape, biodiversity and transport. That is not my claim - it is in the Council's own IIA.

These are not minor tidying-up changes. The Council's own consultants say the Main Mods were significant enough to need further appraisal because they change the spatial strategy, release Green Belt, and additional school, burial and habitat-related consequences.

The release of Green Belt land is not necessary. The Save Chapelton, Ecclesfield and Grenoside Green Belt campaign group has conducted a review of brownfield sites across Sheffield and identified a substantial number of viable alternatives for housing and warehouse development (see Exam 141). This evidence demonstrates that sufficient capacity exists within brownfield land to meet the requirements of the Sheffield Local Plan, without the need to develop Green Belt sites.

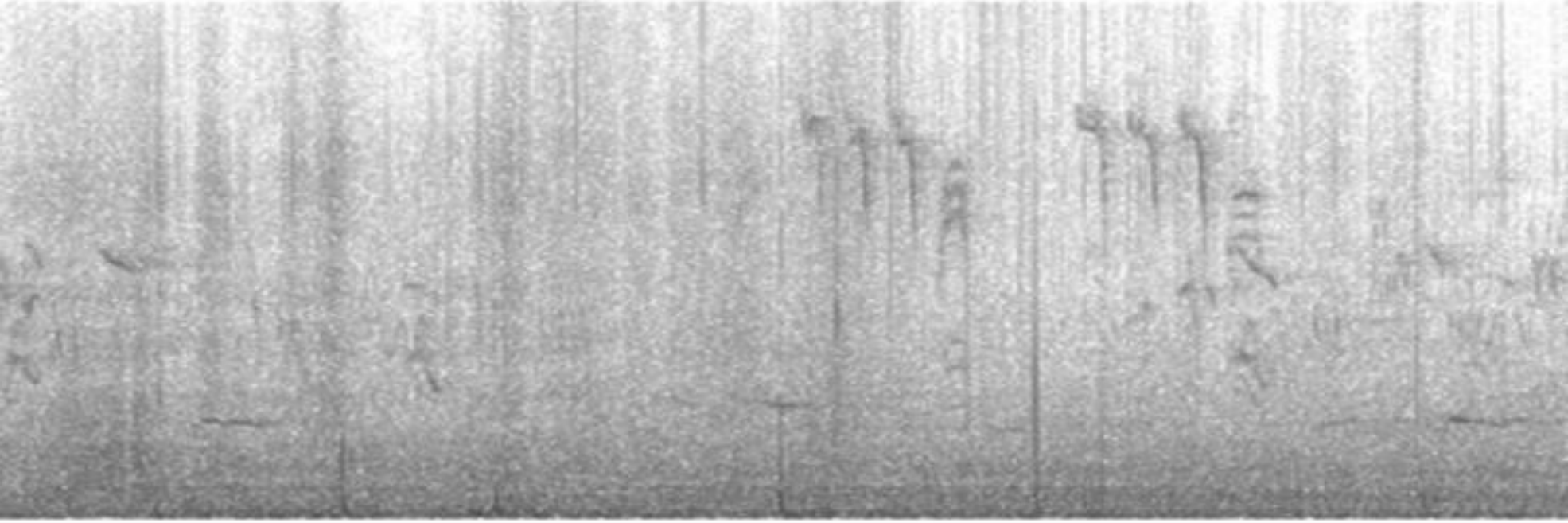
Exam 141 - https://d282b3ca-4277-4cc4-942b-3aeaef3043d5.filesusr.com/ugd/4446b7_30899ea20da14cc6a24f6225f189c0a7.pdf

In conclusion, the release of Green Belt land in Sheffield is not necessary, and there is clear evidence to support this. There is a strong and growing community committed to protecting this protected land, and we urge the Council and developers to prioritise the use of brownfield sites first. The key question remains: will the Council listen to the people of Sheffield and act to preserve the Green Belt, or risk repeating history such as the street trees campaign?

Yours faithfully,

Jessica Doncaster





Best suggestions



European Robin ✓



Yellowhammer ●



Ring-necked Pheasant



Eurasian Blue Tit ✓



Eurasian Wren ✓



Dunnock ✓



House Sparrow ✓



Great Tit ✓



Eurasian Blackbird ✓



03:40



Identify



Explore



Life List



Settings





April 8 • Sheffield, England

18:20 • 5 birds

✓ Saved



Eurasian Blackcap ✓



Common Wood-Pigeon ✓



Eurasian Blackbird ✓



Eurasian Blue Tit ✓



Eurasian Curlew







REF5.0113

S13 Greenbelt

From: [REDACTED]
Date: Sun 2026-04-26 1:02 PM
To: SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Sir

I would like to draw your attention once again to Finchwell Road in all your recommendations, especially with the council ready to implement no parking on kerbs. Finchwell Road has cars on the kerb on both sides of the road due to its narrow width and certainly not suitable for heavy goods vehicles. Nobody ever considers when it is closed in part like recently (Gas piping) and carriers had difficulty driving down Hall Road (that will also be affected re parking), and having to do 3 point turns to turn onto Finchwell Road. So diversions clogged up Dodson Drive, St Joseph's Road etc then. Have not seen anything about the accidents at end of Road which increased dramatically with build of Barret estate. The 20mph speed means nothing when drivers beat the lights at the junction and the road bump calmers are useless. I have reported this to you last year and also about the bent rails at the junction after one such accident..still not repaired!!

So please provide us with a workable plan, without Orgeave diversions for residents after road works or accidents occur.

The junction is worst in area for accidents and, as is, will double in time with these plans.

Regards

Tony Copw
[REDACTED]

Sent from my Galaxy

----- Original message -----

From: [REDACTED]
Date: 17/04/2026 11:34 (GMT+00:00)
To: [REDACTED]
Subject: Re: Other work and slight problem

I'll call you on Thursday morning mate to arrange a time, thanks



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This email and the information contained in it and in any attachments are confidential and may be privileged. If you have received this email in error please notify us immediately. You are not authorised to and must not disclose, copy, distribute or retain this email or any part of it.

Yes ok. Let us know time .
Regards

Tony

I have a driver on holiday next week so I'm a bit all over the place.
I will get out to you but at the moment I think it will be Thursday.
Would that suit you?



ANTSCAPES
& GROUNDWORKS

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Hi

Hope you had good holiday.

Remember to come and see us about other work.

Also resin catching a bit on garage door bottom, as just pointed out by my decorator when he finishing painting it!

So he leaving it, but could distort it.

Regards

Tony

Sent from my Galaxy

FW: S13 Greenbelt REF Modification M411

From tonycope40 [REDACTED]
Date Wed 2026-04-29 5:29 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Please consider this for objection to Green Belt Plan for Farm / Fields behind Finchwell Rd.
Have just received plan reference number.
This is besides general traffic objections and loss of this great area loved by walkers and runners of Handsworth Roadhogs that I helped found in 1985.

Regards

Tony Cope

----- Original message -----

From: tonycope40 [REDACTED]
Date: 26/04/2026 13:02 (GMT+00:00)
To: SheffieldPlan@sheffield.gov.uk
Subject: S13 Greenbelt

Dear Sirs

I would like to draw your attention once again to Finchwell Road in all your recommendations, especially with the council ready to implement no parking on kerbs. Finchwell Road has cars on the kerb on both sides of the road due to its narrow width and certainly not suitable for heavy goods vehicles. Nobody ever considers when it is closed in part like recently (Gas piping) and carriers had difficulty driving down Hall Road (that will also be affected re parking), and having to do 3 point turns to turn onto Finchwell Road. So diversions clogged up Dodson Drive, St Joseph's Road etc then. Have not seen anything about the accidents at end of Road which increased dramatically with build of Barret estate. The 20mph speed means nothing when drivers beat the lights at the junction and the road bump calmers are useless. I have reported this to you last year and also about the bent rails at the junction after one such accident..still not repaired!!

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Tony Copw
[REDACTED]

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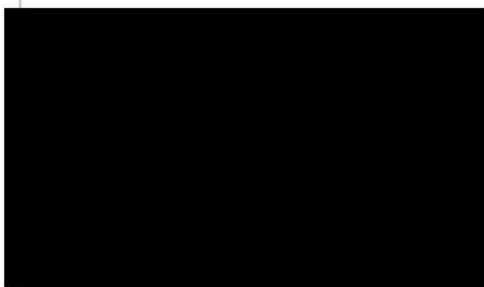
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Regards

Tony

Sent from my Galaxy

REF5.0114

Sheffield Plan-Consultation on Main Modifications

To: Strategic Planning

5th Floor, Howden House,

Sheffield, S1 2SH

Email: sheffieldplan@sheffield.gov.uk

Dear Planning Inspector,

We wish to make a representation on the Main Modifications to The Sheffield Plan, and in particular, to modifications specifically relating to site allocation NWS31 (land between Storth Lane and School Lane S35 ODT).

Introduction

There are many factors that affect the viability and deliverability of site NWS31 including but not limited to, flood risk, site access and local highway issues. Most of these issues have yet to undergo detailed assessment. Development of the site would, without doubt, result in significant negative impacts to many local residents, particularly in the area of Health and Wellbeing due to loss of amenity of Green and Open Space.

The council have acknowledged in their *Integrated Impact Assessment Update and Addendum* document, that the current version of the Plan including new Green Belt Allocations, although bringing positive effects due to increased building capacity, will also bring with it increased negative effects in relation to sustainability, meaning there will be some degree of 'trade off'.

If this community is to accept this 'trade off', and the negative impacts of it, we are fully justified in asking for assurance that robust investigations have been undertaken to ascertain that the site is actually suitable and viable for development in the first place, otherwise its Green Belt status will have been removed for no discernible reason.

Secondly, if the development was proved possible, we need to have certainty that mitigations and compensation will be comprehensive and designed to meet the needs of **all** members of this community, whilst providing protection for the majority of wildlife on site. Minimal compensation is not justified given the negative impacts.

Main Modifications (MMs) to the Plan can therefore **not** be considered 'sound' unless they provide for full investigation of all issues that could impact site viability **before** the site is promoted for sale/development. In addition, MMs need to include enough site-specific detail to ensure that mitigations are deliverable, and provide the **best possible** outcome for the existing community and local wildlife.

A much better alternative exists. This would be to remove Site NWS31 from the allocation completely, and instead concentrate on developing one of the 'Large Windfall Sites' referred to in the Main Modifications (page/policy 19/SA2, 20/SA3&4, 21/SA5, 22/SA6, 24/MM77) or 'Opportunity Sites' (page 171/173). These are mentioned in the MM's to the Plan so clearly have already been identified as available, and some will be in the same area as site NWS31. More brownfield 'Windfall'

sites will also emerge, especially if the council make another call for sites, which they have indicated they intend to do.

Additionally, recent evidence suggests that the additional Greenbelt Allocations might not actually be needed as the demographics of Sheffield are changing. Latest ONS data shows a decline in the birth rate and there has also been a significant decline in overseas student numbers (in the thousands). These will both have an impact on the amount and also type of building required in this city to meet its current and future needs.

The Main Modifications cannot be considered to be 'sound' unless there is certainty that housing requirement projections are accurate and have taken into account recent changes and trends in demographics that could have an impact on future housing requirements.

In view of the new evidence, and the *IIA update and addendum* and its findings on sustainability, reassessment of a Brownfield only option is likely justified.

The following points relate to **MM332 – Main Modifications for proposed Site Allocation NWS31 (page 141/2) – Conditions on Development.**

Loss of Amenity of Green and Open Space (ref. MM332, conditions 1,3)

The Council acknowledges that:

“The site is well used and valued by the local community as an informal area of natural greenspace, with formal and informal paths. It also provides connections to Glen Howe Park/Wood, Storth Lane and areas of Wharnccliffe Side south of Tinker Brook.”

(ref. *Sheff. Plan Green Belt Allocations: Compensatory Improvement Opportunities within remaining Green Belt*)

They also say that:

“For Health and Wellbeing, some new site allocations may reduce the overall amenity experienced by nearby residents. Although the plan already includes measures to minimise these effects, it is unlikely that all remaining negative impacts can be fully avoided.”

(ref. *IIA report Addendum vi, page 38, Mitigation and Enhancement, Health and Wellbeing negative effects.*)

Development of this site would result in a significant loss of amenity of this Green Space for local residents.

The Main Modifications are not 'sound' as they rely on the Council's compensatory proposals (as outlined in *Sheffield Plan Green Belt Allocations: Compensatory Opportunities within Remaining Green Belt*), which are inadequate and do not address the needs of the community. They provide little or no compensation for those residents most negatively affected by loss of amenity of Green Space, including those with Protected Characteristics. Proposals for Open Space within the site are equally unsatisfactory.

Main Modifications are not 'legal' as those with Protected Characteristics (including older residents; those with disabilities; illness, and reduced mobility; and young children) will lose the amenity of local and accessible Green and Open Space, with no suitable and acceptable alternative. This would have a negative impact on their Health and Wellbeing and would disproportionately harm those from vulnerable groups. This would be a breach of the Equality Act 2010, which states "Planning decisions must consider how policies affect those with Protected Characteristics," (*Public Sector Equality Duty*). It also contravenes the councils Integrated Impact Assessment Framework principle SA5, that states, "Open Space, Cultural, Leisure and Recreational facilities available for all."

Evidence

- Proximity of Compensatory Space – The distance to remaining Green Belt will be significantly increased for many residents, particularly those who live in the central area of the village (Don Ave, Dixon Drive) and in many cases will exceed the recommended 300m. For many, including those with Protected Characteristics, this will be too far to walk.
- Any Open Space on site is proposed to be on the south side of the site, mainly in the form of an ecological buffer, which is once again too far to walk for some residents. The area is much less accessible for all, has uneven ground, is overgrown and mostly within the flood plain, so is often inaccessible due to waterlogged ground. The experience of this space is very different to the rest of the field, being dark, under the trees and with limited view. It is the remote area of the field that is not typically visited.
- Proposed compensation at Glen Howe Park – The area is steep, with woodland, and little view. The flood mitigation trees and ponds reduce available Open Space. These are remote areas that are less safe for the public. Increased walking distance for many residents.
- Proposed compensation at Wharncliffe Avenue – Mainly sports provision for teens. This will be welcomed, however does not compensate most site users. There are safety issues for elderly residents and younger children. Increased walking distance for many residents.
- Proposed compensation, Don Valley trail – very remote from current site, inaccessible for many due to distance.
- Ageing population, with many at, or near retirement. Statistics show larger number of residents affected by illness or disability than other areas of city. Local school has additional facilities and excellent reputation for SEND provision, resulting in larger than average number of children living in village with SEND.
- Proposed closure of public rights of way during construction will have a large negative impact for residents and will disconnect the village. Alternative routes are less accessible (steps etc.), remote, less safe, and longer.
- Most users of the field use the public footpath accessed from Don Avenue.
- At hearings, the inspector acknowledged the importance of Green/Open Space for residents with Protected Characteristics being close to where they live.

Change Required

In order to protect the Health and Wellbeing of all residents, the Main Modifications need to state that: ' There should be an obligation for the council and planning teams to work with local community groups and residents to ensure that areas of public amenity Green/Open Space are retained on site and located in areas of the site that satisfy, and are appropriate to address, the needs of local residents, including those with Protected Characteristics. '

This should be done at master planning stage at the latest.

FLOOD RISK (ref. MM332 condition point 4)

Site NWS31 is known to have a significant problem with groundwater and drainage. The Level 2 Strategic Flood Risk Assessment (SFRA) failed to identify this problem. The Main Modifications rely on the accuracy of the SFRA, and as this issue could have a major impact on the viability and deliverability of the site, without a specific requirement for a detailed ground water assessment, the Main Modifications cannot be considered 'sound'.

Evidence

- There are many examples of residents' experience of groundwater on the site. Large areas of the field are often waterlogged during winter months and any extended periods of wet weather. The waterlogged areas can extend significantly up the site and are not just confined to areas in or near the flood plain for Tinker Brook.
- Problems with groundwater are not just confined to the site, but apply to the whole village and may be in part due to the existence of underground streams, the large areas of clay soil, and the topography of the land. There are currently issues with groundwater affecting the village community centre (currently closed as a result). Water has been seen gushing through garden walls during wet weather on roads close to the site.
- Historically, the development on Don Avenue, adjacent to site NWS31 which shares the same topography, encountered many problems with drainage during construction, including flooding of some nearby houses. Profit margins for the build were claimed to be negatively impacted.
- The site has not yet been assessed with respect to climate change.
- The Environment Agency has recently funded tree planting on site to act as natural flood mitigation. The SFRA identifies larger areas of the site with the potential for further planting. This not only illustrates the existence of a problem here, but also could affect site viability.

REQUIRED CHANGE

Main Modifications should include a requirement for full detailed assessments of groundwater and site run off to be carried out BEFORE the site is released for development. Assessment should account for worst case scenarios i.e. wet weather conditions. Further investigations should be carried out into possible mitigations and their likely success and impact on site viability. Areas intended for public footpath access/Open Space should also be assessed for suitability with respect to presence of groundwater

ACCESS OFF DON AVENUE (ref. MM332 condition 6)

The access point for the site was only confirmed by the council at the hearings stage of the consultation. As such, there has been limited opportunity for residents to make representations regarding this.

There are some complex issues surrounding access off Don Avenue. In order to be found 'sound', the Main Modifications need to be more specific in relation to these issues. The MM point is also not sound as it only specifies one entry point to the site, whereas sites of 100 homes or more usually require two access points.

Evidence

- There is congestion on Dixon Drive and the Brightholmlee Lane junction to Main Road.
- Safety issues around school. SEND pupils etc. and children playing out on the surrounding estate roads.
- Future limited parking provision.
- Access constraints for plant machinery due to narrow roads, parked vehicles and tight bends. Council construction repair works on proposed access roads are currently causing large amounts of disruption in the village.
- Access to residents' homes including disabled access and emergency vehicles, particularly around proposed site entrance. Installation of utilities to site would cut off access to a significant number of homes.
- Land drain and land slippage across the access point to site needs full investigation.
- Previous development on Don Ave – Building was avoided in the area immediately adjacent to site boundary (approx.. 5m) due to alleged land unsuitability. This needs investigation.
- Local road infrastructure may need improvements to cope with heavy plant machinery and extra traffic.

Changes required

Main Modifications need to specify that:

-Traffic assessment needs to be detailed and consider safety issues around school and nearby estate roads, parking issues, access for plant machinery, impact on junctions etc.

-A detailed assessment is required to determine impact on access to residents' homes, including disabled access and emergency vehicles.

-Assessment of Land Drain and Land slippage/ground issues near the proposed site entrance should take place.

(In all cases, possible mitigations should be considered and assessed for Feasibility).

-A second site access point should be considered from Storth Lane.

-Retention of some public footpath access across the site during construction should be considered in collaboration with local community groups.

BIODIVERSITY (MM332 condition points 8,9,10)

The Main Modifications are not 'sound' in respect of Biodiversity as there is no specific mention of Protected Species, despite residents' presentation of clear evidence of their existence on site, both during the previous consultation and at the hearings.

As the site has been identified as having a high Biodiversity Net Gain value (Ecology Report), and the value is likely to increase after Protected Species values are added, in order for the MMs to be 'sound', there should be a commitment for BNG to be delivered on site in the first instance in line with BNG hierarchy.

Evidence

- Residents have presented clear photographic and video evidence of Protected Species on site including bats and barn owls.
- A bat roost exists at the end of Don Avenue adjacent to site (within 5m).
- Ecology report states requirement for a further detailed investigation of Protected Species.
- Ecology report recommended retention of some areas of grassland on site where possible.
- BNG does not currently include values for Protected Species or Watercourse

Changes Required

MMs should state that:

1. Further detailed assessment should be carried out for Protected Species present on site or very close to the site and BNG should be adjusted accordingly.
2. BNG for watercourse should be calculated.
3. Mitigations should be put into place for all identified Protected Species and their habitats including suitable buffers and light restrictions around forage areas and flight paths. This should apply to all habitats (bat roosts etc.) identified both on site and within close proximity to site.
4. Some areas of open grassland should be retained.

AND


Condition point 10 "where feasible" should be removed so that the statement reads: "Biodiversity Net Gain should be delivered on site within these areas in the first case, in line with the BNG hierarchy."

Yours Sincerely,

Wharncliffe Side 'Let's Breathe' Community Group

REF5.0115

Main Modification Sheffield Local Plan Site NES39 Wheel/Middleton Lane Objection

From Sandra Poore 
Date Sun 2026-04-26 4:10 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>



Dear Strategic Planning Team,

I am writing to express my objection to the proposed Main Modifications to the Sheffield Local Plan, specifically in relation to Site NES39 land of Wheel lane and Middleton Lane.

I note that Parcels B and C have been removed from the plan on the basis that they are described as "particularly attractive" and that they "make a strong contribution to the character and setting of the local area," with development likely to cause "significant landscape/visual harm."

While this assessment is entirely valid for Parcels B and C, it applies equally to Parcel A. This land is home to endangered species and includes acid grassland, mature trees, historic hedgerows, and drystone walls dating back to the before the 1770s. In both ecological and landscape terms, Parcel A is just as "particularly attractive" and makes an equally strong contribution to the character of the area as the other parcels. Its development would likewise result in "significant landscape/visual harm."

Development on Parcel A would significantly affect the "strong contribution to the character and setting of the local area." The fields at NES39 function as a single, connected ecosystem, and cannot be considered in isolation. Development on one parcel will inevitably impact the others and would "cause significant landscape/visual harm" across the wider site. Furthermore, construction activity and its long-term effects are not contained within a single field. Given the natural eastward slope of Parcel A, surface runoff would drain into Parcels B and C, described as "open fields sloping down to a river valley." This creates a clear risk that both the fields and the river valley would be adversely affected by pollution resulting from the development.

Endangered species, including bats, woodpeckers, curlew, adders, hedgehogs and greenfinches, among many others all depend on this land as their habitat. What specific assessments and safeguards have been put in place to ensure these species are protected during any proposed development?

It is not enough just to say "the Golden Rules apply". If the Council is relying on those rules to justify Green Belt release, it should show clearly what they mean in practice for these sites and how they can actually be delivered.

The Council's own appraisal says the Main Modifications make the Plan worse for soil and land, landscape, biodiversity and transport. That is not my claim - it is in the Council's own IIA.

These are not minor tidying-up changes. The Council's own consultants say the Main Mods were significant enough to need further appraisal because they change the spatial strategy, release Green Belt, and additional school, burial and habitat-related consequences.

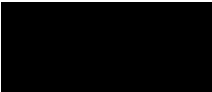
The release of Green Belt land is not necessary. The Save Chapeltown, Ecclesfield and Grenoside Green Belt campaign group has conducted a review of brownfield sites across Sheffield and identified a substantial number of viable alternatives for housing and warehouse development (see Exam 141). This evidence demonstrates that sufficient capacity exists within brownfield land to meet the requirements of the Sheffield Local Plan, without the need to develop Green Belt sites.

Exam 141 - https://d282b3ca-4277-4cc4-942b-3aeaef3043d5.filesusr.com/ugd/4446b7_30899ea20da14cc6a24f6225f189c0a7.pdf

In conclusion, the release of Green Belt land in Sheffield is not necessary, and there is clear evidence to support this. There is a strong and growing community committed to protecting this protected land, and we urge the Council and developers to prioritise the use of brownfield sites first. The key question remains: will the Council listen to the people of Sheffield and act to preserve the Green Belt, or risk repeating history such as the street trees campaign?

Yours faithfully,

Sandra Poore



REF5.0116

Objection to the proposed main modification to the Sheffield local plan - Site SS19

From John Bowler [REDACTED]
Date Sun 2026-04-26 6:54 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Strategic Planning Team,

I am writing to object to the proposed Main Modifications to the Sheffield Local Plan, and particularly those that impact site SS19. While I recognise the need for a sound and deliverable plan, several of the modifications materially weaken safeguards that are essential for public safety, statutory compliance, and the fair distribution of development impacts across the city. For these reasons, the proposed modifications fail to meet the tests of soundness set out in paragraph 36 of the National Planning Policy Framework (NPPF), specifically that the Plan must be justified, effective, and consistent with national policy.

I therefore set out below my objections to specific modifications.

MM7- This reframes the purpose of the Green Belt by highlighting only its role in supporting urban regeneration, while omitting the full set of Green Belt purposes set out in the NPPF. This narrow and reductive wording misrepresents national policy, weakens the strategic function of the Green Belt, and risks distorting future decision-making by implying that regeneration is its primary or sole purpose. Sheffield's Green Belt prevents sprawl and safeguards the countryside, yet MM7's selective emphasis creates an imbalanced narrative that could be used to justify further releases. The modification is therefore not justified, not effective, and should be amended to reflect the complete statutory purposes of the Green Belt.

Further to this, paragraph 5.9.8 of the Impact Assessment Report Addendum: Modifications Consultation (referred to in this document as IIA from this point, which can be found [here](#)) confirms that 'permanent negative effects would remain' on the environment and landscape character of SS19 as a result of its development. The assessment also confirms in paragraph 5.9.12 that the moderation of allocating green belt sites for development will have predominantly negative effects that will be difficult to fully mitigate.

MM10 MM11 MM90-MM93 - The Sheffield Local Plan relies on a significant windfall allowance of 7,475 homes out of a total supply of 39,159 homes (MM90), equating to approximately 19% of the overall housing supply.

This represents a substantial proportion of housing delivery being dependent on unallocated and uncertain sites, which by definition are not plan-led. The Plan does not provide sufficient evidence to demonstrate that this level of windfall delivery will be realised in a consistent, sustainable, or timely manner.

MM92 defines that the housing trajectory shows that the Sheffield Local Plan delivers only 298 dwellings above the identified requirement of 38,020 homes.

This represents a margin of less than 1% across the entire plan period, providing no meaningful flexibility to account for delays, non-delivery, viability issues, or infrastructure constraints. This is

particularly concerning given the Plan provides only a very small margin above its housing requirement, meaning any shortfall in windfall delivery would result in the Plan failing to meet its targets.

MM18- With SS19 being one of the first green belt sites to be developed, and a year 7 place deficit until 2028/29, this does not provide the assurance that there will be adequate educational provision in the S12 area. Paragraph 3.2.3 of the Integrated Impact Assessment Report Addendum: Modifications Consultation (document [here](#)) states that, if a city centre school was built, it would be unlikely to be ready in time for the forecast peak deficit in places, weakening this mitigation further still. The moderation also fails to address how the educational needs of a post 16 student population, which continues to rise and will peak in 2028/29, will be met. This is a particular concern for S12 as the population will increase significantly with the planned development and south-east Sheffield has no post-16 provision.

There are also significant concerns about primary school provision across the S12 area, with Charnock Primary Academy (the primary school closest to SS19) already being oversubscribed by 33% (Sheffield City Council, 2025). The plan proposes the development of approximately 1,600 new homes in this part of the city (Draft Sheffield Local Plan Interactive Map and Sheffield Additional Site Allocations), growth that would ordinarily require a new primary school if delivered as a single strategic development. However the plan fails to demonstrate that essential education infrastructure can support the proposed level of growth.

MM19- The wording “include consideration” is non-binding and fails to secure delivery. The modification does not commit to a new facility, which is not allocated a site, and does not address the spatial mismatch between need and provision. S12, which lies outside the Central Sub-Area, is expected to absorb significant residential growth with just one extra consultation room being allocated to the area in the plan, despite having pockets of high deprivation and subsequent poor health outcomes. MM19 does not demonstrate how healthcare needs arising from this growth will be met, and fails the NPPF tests of effectiveness and justification, and risks exacerbating health inequalities unless strengthened.

Concerns around the impact of development on health and wellbeing are supported by the revised IIA (which can be found [here](#)) which states that ‘some new site allocations may reduce the overall amenity experienced by nearby residents. Although the Plan already includes measures to minimise these effects, it is unlikely that all remaining negative impacts can be fully avoided’. Paragraph 5.2.2 of this document also acknowledges that removal of greenbelt will have ‘some negative effects in terms of mental health and wellbeing’ on surrounding communities.

MM20 -The phrase “wherever practicable” is unacceptably ambiguous in a policy area that is critical to sustainable development and infrastructure delivery. It provides no commitment or assurance that transport improvements will be secured. The modification fails the NPPF tests of effectiveness and clarity, and risks undermining modal shift, accessibility, and safety objectives. It also weakens the plan’s ability to secure equitable outcomes across sub-areas. The wording must be replaced with a firm commitment to secure transport improvements proportionate to development scale and impact, supported by planning obligations and the Infrastructure Delivery Plan.

This is particularly important for the S12 area, where transport is a significant concern in relation to the scale of development proposed. The Sheffield Local Plan identifies approximately 1,600 new homes across S12, which will inevitably generate a substantial increase in traffic movements and place additional pressure on an already constrained local road network. However, due to the dispersed spatial distribution of these allocations, there is currently no clear or coordinated transport strategy demonstrating how the cumulative impact of these developments will be mitigated.

The plan does not provide sufficient detail regarding required junction improvements, public transport capacity, pedestrian and cycling infrastructure, or wider highway mitigation measures necessary to support this level of growth. Without clear and deliverable transport commitments, there is a risk that

the cumulative traffic impacts will significantly worsen congestion, reduce road safety, and undermine the sustainability of the area. Paragraph 5.6.5. If the IIA states that site SS19 'benefits from its proximity to the blue tram route and a high-frequency bus corridor', however, the lived experience of current residents is that this route is already under pressure during peak times and buses are infrequent and unreliable. As such, it is unclear how the proposed level of housing growth in S12 can be accommodated without substantial and clearly defined transport infrastructure improvements.

MM127 & MM128- The Plan suggests that Green Belt windfall sites could deliver up to 50% affordable housing, but there is no evidence this is achievable in practice. In fact, the Council's own evidence shows that sites like SS19 are only likely to deliver around 30% affordable housing. This creates a clear gap between what the policy promises and what can actually be delivered.

The Plan also relies on "windfall" sites to deliver higher levels of affordable housing. However, windfall sites are uncertain and cannot be guaranteed to come forward, or to deliver the infrastructure and affordable housing needed.

This means the Plan is relying on outcomes that may never happen, while still allowing development on Green Belt land.

The Council's own housing needs evidence shows that the majority of housing need in Sheffield is for affordable housing. However, the Plan relies on sites such as SS19 that are only likely to deliver around 30% affordable housing, alongside uncertain windfall development. This fails to align with the identified need and undermines the justification for releasing Green Belt land. As a result, the approach is not justified, not reliable, and does not provide confidence that the promised affordable housing will be delivered.

MM224 MM 227- These modifications recognise that some sites have constraints (such as flood risk, access issues, and environmental limits), but there is no evidence of any level of recalculation to ascertain the reduction in buildable area and therefore reduction of the number of homes expected from those sites.

This raises concerns that the Plan is overestimating how many homes can actually be delivered. If parts of sites cannot be built on, the total housing numbers should be reduced accordingly.

In the case of sites such as SES13, the Plan acknowledges the need for buffers but does not reassess how this affects the number of homes the site can deliver.

More worryingly, SS19 is not included in these modifications even with significant constraints, including flood risk and the ecological corridor as well as additional buffers for the brook and hedgerows, this creates a risk that the Plan is relying on housing numbers that are not realistic, which undermines confidence that the overall housing target can be met & with such a low "buffer" of housing above the target, the plan could fail should the reality be reflected.

As a result, the Plan is not reliable, the modifications are not consistent across sites and does not provide a clear or accurate picture of what can actually be delivered.

MM429 (SS19) - The S12 Green Belt Action Group has submitted two previous consultation statements for MM429 (SS19) which highlight significant site constraints including flood risk and the ecological corridor, the need to protect the robin brook and its impact on the Moss Valley SSSI along with access constraints and hedgerow buffers but SS19 is not referenced in MM224 or MM227, which should require recalculation of housing impact across site allocations. This omission is concerning. If SS19's constraints are serious enough to warrant modification text, they should also trigger a reassessment of its contribution to housing supply. The failure to cross-reference SS19 in the impact recalculation undermines the credibility of the housing trajectory and suggests that constraint-driven reductions are not being applied consistently. This raises soundness concerns under NPPF paragraph 36(b) and (c): the plan may not be justified or effective if constrained sites are

retained without transparent recalibration. The inconsistency also risks undermining spatial equity, as less constrained sites may be overburdened to compensate for undeliverable allocations like SS19.

It is also apparent that even with amended brook buffers and hedgerow buffers, the appropriate buffering has not been removed from the developable area, it is believed this will have an impact on the number of houses that are deliverable on the site and therefore impact the viability of the site.

The modifications also fail to consider the impact of North East Derbyshire District Council's Local Plan, particularly its proposed allocation immediately adjacent to SS19 (site reference 45900), which could deliver a further 348 homes alongside shops or a care facility. It is significant that the landowner, promoter and developer for site 45900 are the same as for SS19, yet NEDDC has assessed 45900 as unsuitable for development due to the same constraints repeatedly raised in relation to SS19.

The development of 45900 would create a single, continuous cross-boundary block of development that would clearly conflict with several of the Green Belt purposes set out in national policy: they would **fail to check the unrestricted sprawl** of the existing built-up area, **erode the separation between Sheffield and North East Derbyshire**, and **constitute significant countryside encroachment**. The two developments would effectively double the size of the Charnock estate with no planned proportionate infrastructure to support this rapid growth.

There appears to have been no meaningful collaboration with Sheffield City Council to assess the combined effects of these neighbouring proposals. The absence of any cross-boundary assessment represents a clear gap in the evidence base and undermines the justification for retaining SS19 in the plan.

This raises serious concerns regarding compliance with the Duty to Cooperate and further undermines the soundness of the Plan.

In conclusion, the main modifications do not adequately address the constraints and concerns highlighted in previous consultations, or during the public hearings. For the plan to be sound, it depends on modifications being made, however those proposed are vague and lack the detail to demonstrate that they are specific, credible, deliverable or proportionate to the scale of the development in the area.

This fails to align with paragraph 42 of the NPPF which states that 'the more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits'.

I therefore urge the Inspectors to require further modifications, including the removal or reassessment of SS19, to ensure the Plan is sound

I appreciate the opportunity to comment and urge the Inspectors and the Council to reconsider the Main Modifications to ensure the Local Plan remains robust, equitable, and fit for purpose.

Finally, I would urge the council specifically to consider the impact on the health and wellbeing of both young and old in the S12 area who are facing a ten year period of disruption. Councillors are charged with serving and improving the communities they are elected by, not destroying them.

Yours sincerely,

John Bowler

REF5.0117

Objection to the proposed main modifications to the Sheffield local plan - Site SS19

From John Bowler [REDACTED]
Date Sun 2026-04-26 6:57 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Strategic Planning Team,

I am writing to object to the proposed Main Modifications to the Sheffield Local Plan, and particularly those that impact site SS19. While I recognise the need for a sound and deliverable plan, several of the modifications materially weaken safeguards that are essential for public safety, statutory compliance, and the fair distribution of development impacts across the city. For these reasons, the proposed modifications fail to meet the tests of soundness set out in paragraph 36 of the National Planning Policy Framework (NPPF), specifically that the Plan must be justified, effective, and consistent with national policy.

I therefore set out below my objections to specific modifications.

MM7- This reframes the purpose of the Green Belt by highlighting only its role in supporting urban regeneration, while omitting the full set of Green Belt purposes set out in the NPPF. This narrow and reductive wording misrepresents national policy, weakens the strategic function of the Green Belt, and risks distorting future decision-making by implying that regeneration is its primary or sole purpose. Sheffield's Green Belt prevents sprawl and safeguards the countryside, yet MM7's selective emphasis creates an imbalanced narrative that could be used to justify further releases. The modification is therefore not justified, not effective, and should be amended to reflect the complete statutory purposes of the Green Belt.

Further to this, paragraph 5.9.8 of the Impact Assessment Report Addendum: Modifications Consultation (referred to in this document as IIA from this point, which can be found [here](#)) confirms that 'permanent negative effects would remain' on the environment and landscape character of SS19 as a result of its development. The assessment also confirms in paragraph 5.9.12 that the moderation of allocating green belt sites for development will have predominantly negative effects that will be difficult to fully mitigate.

MM10 MM11 MM90-MM93 - The Sheffield Local Plan relies on a significant windfall allowance of 7,475 homes out of a total supply of 39,159 homes (MM90), equating to approximately 19% of the overall housing supply.

This represents a substantial proportion of housing delivery being dependent on unallocated and uncertain sites, which by definition are not plan-led. The Plan does not provide sufficient evidence to demonstrate that this level of windfall delivery will be realised in a consistent, sustainable, or timely manner.

MM92 defines that the housing trajectory shows that the Sheffield Local Plan delivers only 298 dwellings above the identified requirement of 38,020 homes.

This represents a margin of less than 1% across the entire plan period, providing no meaningful flexibility to account for delays, non-delivery, viability issues, or infrastructure constraints. This is particularly concerning given the Plan provides only a very small margin above its housing requirement, meaning any shortfall in windfall delivery would result in the Plan failing to meet its targets.

MM18- With SS19 being one of the first green belt sites to be developed, and a year 7 place deficit until 2028/29, this does not provide the assurance that there will be adequate educational provision in the S12 area. Paragraph 3.2.3 of the Integrated Impact Assessment Report Addendum: Modifications Consultation (document [here](#)) states that, if a city centre school was built, it would be unlikely to be ready in time for the forecast peak deficit in places, weakening this mitigation further still. The moderation also fails to address how the educational needs of a post 16 student population, which continues to rise and will peak in 2028/29, will be met. This is a particular concern for S12 as the population will increase significantly with the planned development and south-east Sheffield has no post-16 provision.

There are also significant concerns about primary school provision across the S12 area, with Charnock Primary Academy (the primary school closest to SS19) already being oversubscribed by 33% (Sheffield City Council, 2025). The plan proposes the development of approximately 1,600 new homes in this part of the city (Draft Sheffield Local Plan Interactive Map and Sheffield Additional Site Allocations), growth that would ordinarily require a new primary school if delivered as a single strategic development. However the plan fails to demonstrate that essential education infrastructure can support the proposed level of growth.

MM19- The wording “include consideration” is non-binding and fails to secure delivery. The modification does not commit to a new facility, which is not allocated a site, and does not address the spatial mismatch between need and provision. S12, which lies outside the Central Sub-Area, is expected to absorb significant residential growth with just one extra consultation room being allocated to the area in the plan, despite having pockets of high deprivation and subsequent poor health outcomes. MM19 does not demonstrate how healthcare needs arising from this growth will be met, and fails the NPPF tests of effectiveness and justification, and risks exacerbating health inequalities unless strengthened.

Concerns around the impact of development on health and wellbeing are supported by the revised IIA (which can be found [here](#)) which states that ‘some new site allocations may reduce the overall amenity experienced by nearby residents. Although the Plan already includes measures to minimise these effects, it is unlikely that all remaining negative impacts can be fully avoided’. Paragraph 5.2.2 of this document also acknowledges that removal of greenbelt will have ‘some negative effects in terms of mental health and wellbeing’ on surrounding communities.

MM20 -The phrase “wherever practicable” is unacceptably ambiguous in a policy area that is critical to sustainable development and infrastructure delivery. It provides no commitment or assurance that transport improvements will be secured. The modification fails the NPPF tests of effectiveness and clarity, and risks undermining modal shift, accessibility, and safety objectives. It also weakens the plan’s ability to secure equitable outcomes across sub-areas. The wording must be replaced with a firm commitment to secure transport improvements proportionate to development scale and impact, supported by planning obligations and the Infrastructure Delivery Plan.

This is particularly important for the S12 area, where transport is a significant concern in relation to the scale of development proposed. The Sheffield Local Plan identifies approximately 1,600 new homes across S12, which will inevitably generate a substantial increase in traffic movements and place additional pressure on an already constrained local road network. However, due to the dispersed spatial distribution of these allocations, there is currently no clear or coordinated transport strategy demonstrating how the cumulative impact of these developments will be mitigated.

The plan does not provide sufficient detail regarding required junction improvements, public transport capacity, pedestrian and cycling infrastructure, or wider highway mitigation measures necessary to

support this level of growth. Without clear and deliverable transport commitments, there is a risk that the cumulative traffic impacts will significantly worsen congestion, reduce road safety, and undermine the sustainability of the area. Paragraph 5.6.5. If the IIA states that site SS19 'benefits from its proximity to the blue tram route and a high-frequency bus corridor', however, the lived experience of current residents is that this route is already under pressure during peak times and buses are infrequent and unreliable. As such, it is unclear how the proposed level of housing growth in S12 can be accommodated without substantial and clearly defined transport infrastructure improvements.

MM127 & MM128- The Plan suggests that Green Belt windfall sites could deliver up to 50% affordable housing, but there is no evidence this is achievable in practice. In fact, the Council's own evidence shows that sites like SS19 are only likely to deliver around 30% affordable housing. This creates a clear gap between what the policy promises and what can actually be delivered.

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In conclusion, the main modifications do not adequately address the constraints and concerns highlighted in previous consultations, or during the public hearings. For the plan to be sound, it depends on modifications being made, however those proposed are vague and lack the detail to demonstrate that they are specific, credible, deliverable or proportionate to the scale of the development in the area.

This fails to align with paragraph 42 of the NPPF which states that 'the more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits'.

I therefore urge the Inspectors to require further modifications, including the removal or reassessment of SS19, to ensure the Plan is sound

I appreciate the opportunity to comment and urge the Inspectors and the Council to reconsider the Main Modifications to ensure the Local Plan remains robust, equitable, and fit for purpose.

Finally, I would urge the council specifically to consider the impact on the health and wellbeing of both young and old in the S12 area who are facing a ten year period of disruption. Councillors are charged with serving and improving the communities they are elected by, not destroying them.

Yours sincerely,

Carol Ann Bowler

REF5.0118

JUHS response to modifications to the draft Sheffield Plan

From Robin Hughes [REDACTED]
Date Mon 2026-04-27 8:38 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>
Cc [REDACTED]

 1 attachment (344 KB)

JUHS draft Sheffield Plan response to Main and Additional Modifications v2.pdf;

External email

Dear Sheffield Plan team

Please find attached a response by Joined Up Heritage Sheffield to the modifications to the draft Sheffield Plan.

Particular attention is drawn to the response regarding policy SP1. Recommendations to include both designated and non-designated heritage assets were made in previous consultation comments by both Historic England (ref. PDSP.003.004) and JUHS (ref. PDSP.116.002 and PDSP.116.003). The list of responses approved by Full Council accepts this change, but it has not been made. As the change has already been agreed it should be included as part of MM10.

The previous consultation comment by JUHS also recommended that SP1(n) refer to the 'historic environment' rather than to the 'built environment', to recognise that landscapes and other structures such as watercourses are also heritage assets. There was no response to this in the Council's list, indicating that it was overlooked. Limiting scope to the built environment would be inconsistent with the NPPF definition of heritage assets and paragraph 135.

Yours sincerely

Robin Hughes
Trustee, Joined Up Heritage Sheffield

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- Summary of recommended changes
- Detailed changes to policies and supporting text:
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 - CA1, CA1A, CA1B Character Area One: Kelham Island, Neepsend, Philadelphia, Woodside
 - CA2, CA2A, CA2B Character Area Two: Castlegate, West Bar, The Wicker and Victoria
 - CA3A, CA3B Character Area Three: St Vincent's, Cathedral, St George's and University of Sheffield
 - CA4, CA4A Character Area Four: City Arrival, Cultural Industries Quarter, Sheaf Valley
 - CA5, CA5A, CA5B Character Area Five: Heart of the City, Division Street, The Moor, Milton Street, Springfield, Hanover Street
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 - SA4 East Sheffield Sub-Area
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Introduction

Joined Up Heritage Sheffield is a charity that seeks to bring together organisations and individuals interested in heritage, in all its variety, to promote better understanding, a strategic approach and a better-resourced and better-connected presentation of heritage. We have published a Heritage Strategy¹ that establishes a vision for Sheffield's heritage, which has been adopted by Sheffield City Council and is now included in their work programme².

Following the publication of plan documents incorporating Main and Additional Modifications, this document gives our recommendation and reasoning for updates and corrections.

Note on references

Paragraph and policy numbering in this response is as used in the updated plan documents incorporating the Main and Additional Modifications. This is not always consistent with the numbering in the schedules of modifications.

¹ The Heritage Strategy can be found at <https://www.joinedupheritagesheffield.org.uk/heritage-strategy>.

² See resolution 11.2 of the Strategy & Resources Policy Committee meeting of 21st February 2024, available at <https://democracy.sheffield.gov.uk/documents/g8786/Decisions%20Wednesday%2021-Feb-2024%2010.00%20Strategy%20and%20Resources%20Policy%20Committee.pdf?T=2>.

Summary of recommended changes

Mod	Recommendation	Reason
AM1	Add reference to heritage to Foreword.	Align Foreword with Aim 8.
AM40	Add statements about the industrial heritage contribution of rivers in all relevant Sub-Areas and Character Areas to 4.10, 4.17, 4.34, 4.44, 4.51, 4.65, 4.67, 4.69, 4.72 and 4.76, similar to 4.55.	Consistency across all Sub-Areas and recognition of the foundational importance of rivers to the city's historic identity.
MM10	Include both designated and non-designated heritage assets in SP1(n).	Implement change previously agreed.
MM20	Include the need for consistency with biodiversity and heritage objectives in CA2(f), similar to SA1(m) and others.	Consistent approach to riverside routes.
MM27	Include a requirement to 'Conserve, enhance and capitalise on the area's heritage' in CA6(g), similar to CA1(j).	Consistent and accurate reflection of the importance of heritage.
MM29	Delete word 'key' from CA1A(i).	Consistency with NPPF and removal of redundant word.
MM29	Include a requirement to retain and enhance designated and non-designated heritage assets in all Priority Locations and Catalyst Sites in CA2A, CA2B, CA3A, CA3B, CA4A, CA5A and CA5B, similar to CA1A(i).	Consistent and accurate reflection of the particular importance of heritage in sites undergoing regeneration.
MM27, MM29	Reflect the potential for a Conservation Area in the Wicker area in CA2(e) and CA2B.	Decision of Transport, Regeneration and Climate Policy Committee to include this in their work programme.
MM103	Clarify the meaning of 'registered historic parks and gardens' in BG1.	Ensure that BG1 protects all historic parks and gardens.
MM216a	Add locally-listed Rivelin and Loxley waterpower sites to Part 2, Map 6: Heritage Assets.	These are not currently shown.
MM221	Add Grade II-listed buildings at risk and the loss of nationally and locally listed buildings to the monitoring framework in Annex C.	Grade II-listed buildings (other than places of worship) are currently excluded. Losses of buildings at risk would currently be measured as an improvement.
MM22, MM27, MM29, MM33, AM32	Correct Conservation Area name to 'Kelham Island and Neepsend Industrial' in 4.10, CA1(i), 4.13, CA1A(i), 4.14, CA1B(c), CA2(e) and 4.23.	Variants omitting 'Industrial' or 'Neepsend' are incorrect.

Detailed changes to policies and supporting text

Foreword

Recommendation: *Acknowledge the role of heritage in the Foreword.*

Aim 8 of the Plan is for a well-designed city with a strong local identity and a reputation for a quality built environment and for valuing its heritage assets. AM1 provides a rewritten foreword which touches on most of the plan aims. Given the Council's renewed commitment to realising the benefits of heritage the foreword should also refer to their vision for heritage.

SP1

Recommendation: *Amend SP1(n) to read 'Protection, management, and enhancement of designated and non-designated heritage sites and assets, with a focus on achieving the highest standards of new development whilst respecting the industrial and cultural significance of the existing historic environment across Sheffield (see Policy DE1 and Policy DE9).'*

Recommendations to include both designated and non-designated heritage assets were made in previous consultation comments by both Historic England (ref. PDSP.003.004) and JUHS (ref. PDSP.116.002 and PDSP.116.003). The list of responses approved by Full Council accepts this change, but it has not been made. As the change has already been agreed it should be included as part of MM10.

The previous consultation comment by JUHS also recommended that SP1(n) refer to the 'historic environment' rather than to the 'built environment', to recognise that landscapes and other structures such as watercourses are also heritage assets. There was no response to this in the Council's list, indicating that it was overlooked. Limiting scope to the built environment would be inconsistent with the NPPF definition of heritage assets and paragraph 135.

CA1, CA1A, CA1B

Corrections:

- *Amend 4.10, 4.13, 4.14, CA1(j), CA1A(i) and CA1B(c) to refer to the 'Kelham Island and Neepsend Industrial Conservation Area'.*

Recommendations:

- *Amend the third sentence of 4.10 to read 'The role and function of the area is shaped by the River Don, which is key to the area's industrial heritage, and important nearby green assets such as Parkwood Springs and Stanley Fields.'*
- *Remove the word 'key' from CA1A(i).*

The Planning and Highways Committee resolved at their meeting on 10th March 2026 to update the name of the Conservation Area to 'Kelham Island and Neepsend Industrial Conservation Area', re-inserting the word 'Industrial' and confirming a previous decision to add 'Neepsend' to the name.

AM40 amends paragraph 4.55 to recognise the importance to the industrial heritage of the main rivers in the Northwest Sheffield Sub-area. Main rivers across Sheffield make an important contribution in this respect and the recommended change ensures that this is also applied to Character Areas in the Central Sub-area.

The word 'key' in CA1A(i) is never defined, and risks implying that only a subset of heritage assets merit consideration in planning decisions. As defined in the NPPF, all heritage assets have a degree of significance meriting consideration in planning decisions. MM29 introduces the more precise reference to 'designated and non-designated heritage assets' to replace the looser 'key heritage buildings' and the word 'key' appears to be left over from that.

CA2, CA2A, CA2B

Corrections:

- Update 4.23 and CA2(e) to refer to the 'Kelham Island and Neepsend Industrial Conservation Area'.

Recommendations:

- Amend the third sentence of 4.17 to read 'The role and function of the area is shaped by the River Don, Sheffield & Tinsley Canal and Wicker railway viaduct, which are key to the area's industrial heritage, and also by the Inner Ring Road.'
- Amend CA2(e) to read 'Conserve, enhance and capitalise on the area's heritage, especially within the Kelham Island and Neepsend Industrial and City Centre Conservation Areas and a potential Wicker and Victoria Quays Conservation Area, by providing high quality development proposals.'
- Append to CA2(f) 'consistent with biodiversity and heritage objectives.'
- Add the following paragraph to CA2A: 'Retention and enhancement of designated and non-designated heritage assets (including the City Centre Conservation Area).'
- Add the following paragraph to CA2B: 'Retention and enhancement of designated and non-designated heritage assets (including the Kelham Island and Neepsend Industrial Conservation Area and those within a potential Wicker and Victoria Quays Conservation Area).'

To correct the Conservation Area name and for consistency with AM40, see above.

MM20 modifies SA1(m) to recognise the need for consistency with biodiversity and heritage objectives when developing riverside routes, and similar modifications apply to other Sub-Areas. The recommended change ensures that this also applies to the explicit provision for riverside routes in Character Area Two.

MM27 and MM29 modify CA1 and CA1A(i) to recognise the need to conserve and retain heritage assets. This is equally important in other Priority Locations and Catalyst Sites in the Central Sub-area, and the recommended change ensures that this is reflected consistently across all of these.

The Transport, Regeneration and Climate Policy Committee agreed at their meeting on 18th March 2026 to the request of the Planning and Highways Committee that they add a Conservation Area Designation for The Wicker and Victoria Quays to their work programme. It is important that decisions based on a policy written and examined before the committee's decision do not compromise the historic environment in this area, and so it is strongly recommended that the potential for a Conservation Area is reflected in the policies covering that area.

CA3A, CA3B

Recommendations: Add the following paragraph to CA3A and CA3B: 'Retention and enhancement of designated and non-designated heritage assets (including the Furnace Hill Conservation Area).'

For consistency with MM29.

CA4, CA4A

Recommendations:

- Amend 4.34 to read *'The area is situated to the south and east of the City Centre and lies within the Cultural Industries Quarter, City Centre and Norfolk Road Conservation Areas. It has a unique identity given context by established residential areas featuring the iconic Grade II* Listed Park Hill Flats; as well as key gateways into the city at Sheffield railway station, Sheffield Interchange, and the A61 Arundel Gate. Some of Sheffield's more recognisable landmarks including Park Hill Flats, Ponds Forge, Sheffield Hallam University and the former National Centre for Popular Music mark the area as of critical importance to the city. The role and function of the area is shaped by major road and rail infrastructure, the South Street Park/Sheaf Valley Park, the River Sheaf and Porter Brook. The rivers and Grade II-listed railway station are key to the area's industrial heritage.'*
- Add the following paragraph to CA4A: *'Retention and enhancement of designated and non-designated heritage assets, including the locally listed Bramall Lane bridge and culvert.'*

For consistency with AM40, see above; and to list the Conservation Areas correctly.

For consistency with MM29, see above. CA4A(c) promotes deculverting of the Porter Brook and is potentially in conflict with the need to conserve heritage assets.

The former National Centre for Popular Music is one of the city's most recognisable landmarks and is of particular architectural distinction, so is proposed as an addition to the list of such landmarks.

CA5, CA5A, CA5B

Recommendations:

- Amend the first sentence of 4.44 to read *'The City Centre Conservation Area covers a substantial part of the area, part of the area lies within the Hanover Conservation Area, and there are a significant number of listed buildings.'*
- Append to 4.44 *'The topography of the area is shaped by the Porter Brook, which is key to its industrial heritage.'*
- Add the following paragraph to CA5A: *'Retention and enhancement of designated and non-designated heritage assets, including the locally listed Bramall Lane bridge and culvert.'*
- Add the following paragraph to CA5B: *'Retention and enhancement of designated and non-designated heritage assets.'*

For consistency with AM40, see above; and to list the Conservation Areas correctly.

For consistency with MM29, see above. CA5A(f) promotes deculverting of the Porter Brook and is potentially in conflict with the need to conserve heritage assets. Both CA5A and CA5B contain non-designated heritage assets, and although no heritage assets are designated today the policies need to accommodate future designations.

CA6

Recommendations:

- Append to the first sentence of 4.51 *'which is also key to the area's industrial heritage'*.
- Amend CA6(g) to read *'Conserve, enhance and capitalise on the area's heritage, especially within the John Street Conservation Area, by providing high quality development proposals.'*

For consistency with AM40, see above.

MM27, MM33, MM41 and MM55 modify policies in other Character areas to use a form of words replicating CA4(g), and the recommended change ensures that CA6 is consistent with these.

SA4

Recommendation: amend the third sentence of paragraph 4.65 to read ‘These waterways provide attractive routes through the valley and are key to the sub-area’s industrial heritage.’

AM40 amends paragraph 4.55 to recognise the importance to both recreation and industrial heritage of the main rivers in the Northwest Sheffield Sub-area. Main rivers across Sheffield make an important contribution in this respect and the recommended change ensures that this is reflected consistently across all Sub-areas.

SA5

Recommendation: insert after the first sentence of paragraph 4.67 ‘The River Rother, The Moss and Shire Brook flow through recreational green spaces and are key to the sub-area’s industrial heritage.’

For consistency with AM40, see above.

SA6

Recommendation: append to paragraph 4.69 ‘The River Sheaf, Totley Brook and Oldhay Brook flow through green spaces and are key to the sub-area’s industrial heritage.’

For consistency with AM40, see above.

SA7

Recommendation: append to paragraph 4.72 ‘The River Sheaf, Porter Brook and their tributaries flow through recreational green spaces and are key to the sub-area’s industrial heritage.’

For consistency with AM40, see above.

SA8

Recommendation: append to paragraph 4.76 ‘The River Don provides an attractive route through its valley and with the Little Don is key to the sub-area’s industrial heritage.’

For consistency with AM40, see above.

BG1

Recommendation: Amend the third bullet point to read ‘other registered or locally listed parks and gardens.’

The definitions point to ‘Heritage Assets’ in the Glossary for a definition of ‘registered parks and gardens’, but that only states that ‘Sheffield’s historic parks, gardens and cemeteries are also included under the term heritage assets’ and does not give a definition for ‘registered’. The latter refers specifically to those on Historic England’s register, omitting those that are locally listed.

The previous bullet lists several major parks of citywide importance, including a mixture of registered and locally listed assets, creating both duplication and potential confusion. The policy should protect all historic parks and gardens as components of the green network, whether registered or locally listed, as implied by the reference to the definition of 'Heritage Assets'. For the avoidance of doubt it should be changed as recommended.

The Glossary should also be updated with a correct definition of 'registered parks and gardens'.

Part 2, Map 6

Recommendation: *update the map to show the extent of the locally listed areas 'Rivelin Waterpower Sites', 'Loxley Valley water power assets' and the individual locally listed assets in the Rivelin Valley.*

Map 6: Heritage Assets shows markers for most of the assets on the Local Heritage List, but for only one of the twenty-two locally-listed waterpower assets in the Rivelin Valley, and does not show the locally-listed area in the Loxley Valley at all. Given the foundational importance of these assets in the history of the city these are significant omissions and must be corrected.

Annex C

Recommendation: *add the following measures to sub-objective 'To protect, conserve and enhance buildings, landmarks and areas etc.':*

- *% and number of Grade II-listed assets at risk outside the scope of the national register;*
- *Number of designated heritage assets lost through demolition or de-designation;*
- *Number of locally-listed heritage assets lost through demolition or removal from the list.*

The source for these measures is Sheffield City Council.

The Historic England Heritage At Risk register does not include Grade II-listed assets outside London except for places of worship, so as it stands this measure would exclude the vast majority of listed assets in Sheffield including such critical cases as the Old Town Hall. A local register of Grade II-listed assets other than places of worship will be needed in any case, and including these in the Monitoring Framework would be a far more accurate measure of plan effectiveness.


Assets at risk are amongst the most likely to be lost entirely, de-designated or removed from the Local Heritage List. This would also remove them from lists of assets at risk, creating a false impression of an improving measure. Including losses would ensure a fairer reflection.

*Robin Hughes
Joined Up Heritage Sheffield
27th April 2026*

REF5.0119

Sheffield Plan Main Modifications Consultation - Representations on Behalf of Norfolk Estates

From Ben Parkes [REDACTED]
Date Mon 2026-04-27 11:39 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>
Cc [REDACTED]

 1 attachment (403 KB)
Main Modifications Representations FINAL.pdf;

External email

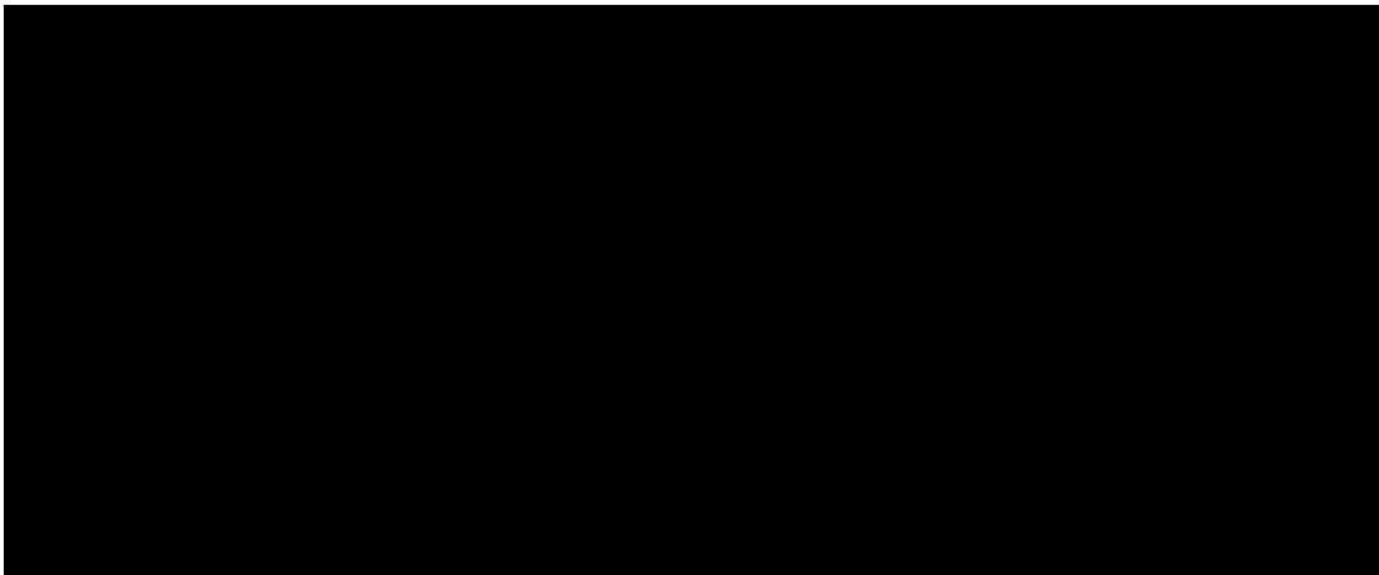
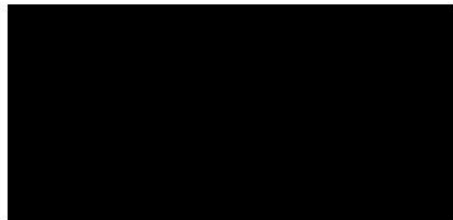
Good morning,

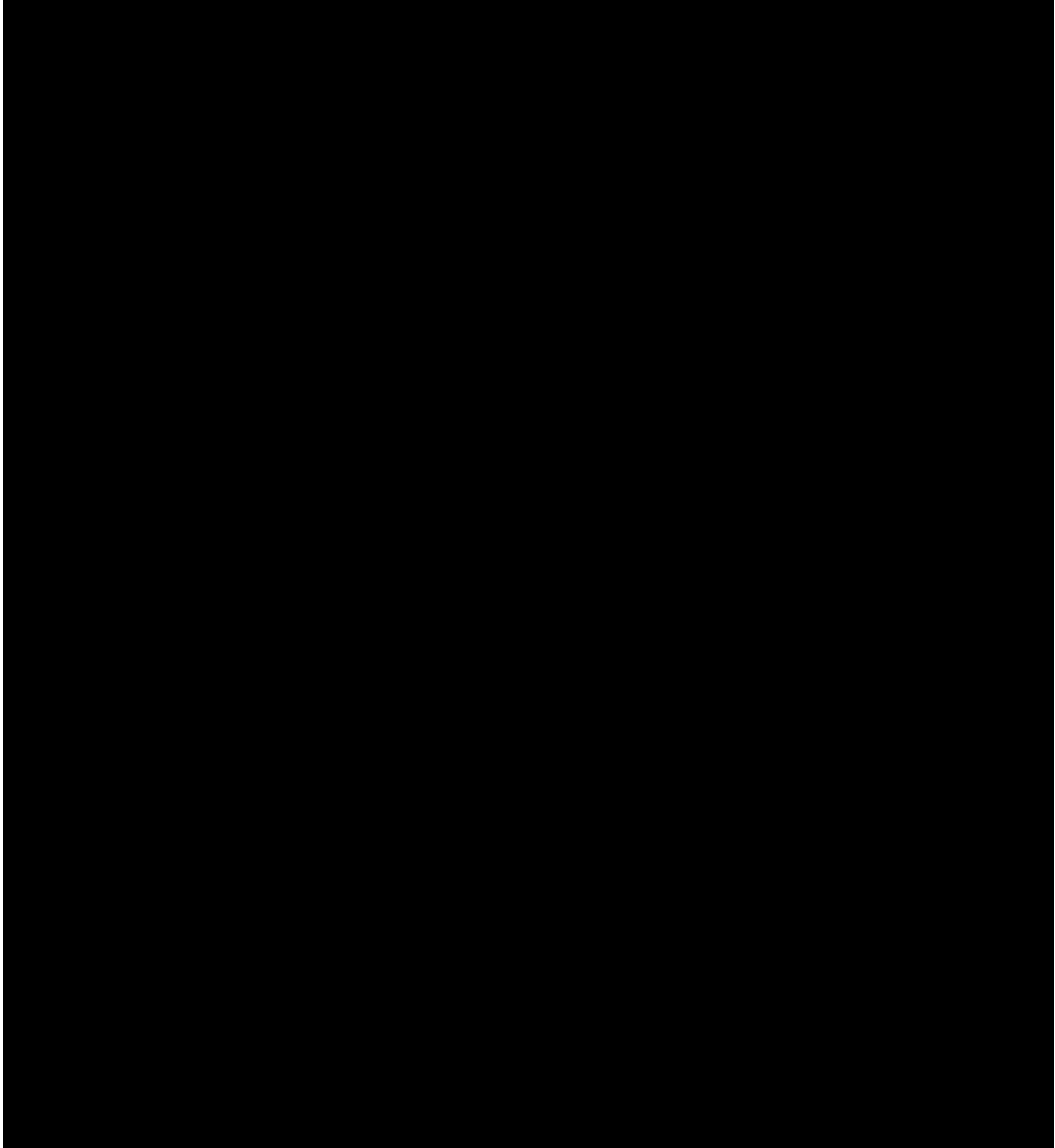
Please see attached for Main Modification drafted by Savills on behalf of Norfolk Estates in respect to their landholdings at Orgreave Park, Handsworth (SES29).

Please confirm receipt of this email.

Kind regards,
Ben

Ben Parkes MRTPI
Senior Planner
Planning





Examination of the Sheffield Local Plan

Representation on Main Modifications

Date of report: April 2026

PREPARED FOR

**Norfolk
Estates (SES29)**

savills

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Document History

Issue	Date	Issued by	Comment
1.0	28.04.26	AK	FINAL

1. Introduction

- 1.1 These Representations has been submitted on behalf of Norfolk Estates with specific reference to the land Orgreave Park (formerly known Handsworth Hall Farm), Sheffield.
- 1.2 Orgreave Park comprises 56.68 ha (140 acres) of agricultural land formerly used for coal mining and waste storage. It is identified for 870 homes and 20 hectares of employment uses under draft allocation SES29.
- 1.3 Norfolk Estates have been participants throughout this Local Plan process. Norfolk Estates are supportive of the Local Plan in principle, but consider there are some amendments required to the Main Modifications Local Plan for it to be made sound. It is considered that the Plan should be found sound should these modifications be made.

Modifications Sought

- 1.4 We set out in Table 1.1 below the summary of the Modifications we suggest should be made in order to make the Local Plan sound. We set out the detailed justification for this in Section 3 and 4.

Table 1.1 – Summary of Modifications Sought

MM Ref	Policy	Modifications Sought
MM68	Policy SA5	Minor text amendment to Policy text
MM127	Policy NC3	Affordable Housing to be on per unit basis
MM128	Policy NC3	Affordable Housing to be on per unit basis
MM410	Site Allocation SES29	Minor amendments to text on 'Condition on Development'

2. Modifications to Allocation SES29

- 2.1.1 Norfolk Estates have promoted Orgreave Park throughout the Local Plan process. The proposed allocation for a mixed use development (SES29) is supported.
- 2.1.2 Norfolk Estates are currently undertaking preliminary work to support an outline planning application on the basis of 20ha of employment land, circa 870 homes and making land available for the proposed Waverley Train Station.
- 2.1.3 Modifications to the Policies Map and wording of Conditions were agreed through the Stage 4 Hearings, including the Statement of Common Ground and the SES29 Hearing Session. We make comment on the modified Policies Map and Conditions on Development as set out in the Main Modifications version of the Local Plan.

2.2 Policies Map Modifications

- 2.2.1 As discussed as part of Issue 7 in the Stage 4 SES29 Hearing Session on the 13th October 2025, the Site's allocation red line needs to be amended to remove land which is not in the ownership of Norfolk Estates. Specifically this relates to land owned by Yorkshire Water on the boundary fronting the railway. It was agreed that the inclusion of this land was an administrative error and it was common ground for the allocation to only include land owned by Norfolk Estates (title references: SYK570738 and SYK694777)¹.
- 2.2.2 The amended Policies Map still includes land owned by Yorkshire Water in the south of the Site fronting the railway, which is not promoted as part of this development and is not known to be available for development. Therefore, the Policies Map needs to be amended to remove this land in line with Action 29 from the Stage 4 Hearings.
- 2.2.3 The Policies Map shows the entire of the Site as being in a Residential Use Zone, and none of it in an Employment Use Zone. As the Site is a mix of residential and employment uses it is important that the employment area of the development is not prescribed within the Residential Use Zone as this adds a restriction to development which could falsely constrain future employment development.
- 2.2.4 It was agreed by Savills and SCC through Issue 2 of the SES29 Hearing Session that the location of each proposed use was subject to further masterplanning work which would be established through a forthcoming outline planning application and pre-application discussions². Therefore, the Policies Map should provide a flexible Use Class Zone reflecting the range of uses to come forward on the Site.

2.3 Conditions on Development

- 2.3.1 Norfolk Estates agrees with the principle of the Conditions on Development and the general wording of them. However, minor modifications are sought on some of the wording to ensure that it is Sound. Suggested wording is set out in red below –

- *Planning policy Framework will apply. Open space should be provided in accordance with Policy NC15.*

¹ Sheffield City Council, EXAM139: Schedule of Action Points and Potential Main Modifications discussed at Sheffield Plan Examination Hearings, Action 29

² Sheffield City Council, EXAM139: Schedule of Action Points and Potential Main Modifications discussed at Sheffield Plan Examination Hearings, MM4.31

- *In accordance with the Golden Rules the level of affordable housing required will be expected to be at a higher level than would otherwise apply to land which has not been released from the Green Belt.*
- *The Golden Rules do not apply to the employment area of the site.*
- *The location of the 20ha of employment area will be determined through the masterplanning process.*
- *Proposals for development on key sites within the Innovation District, including the employment element of SES29 shall support the innovation focused approach to delivering advanced manufacturing, and advanced health & wellbeing uses.*
- *As this allocation was removed from the Green Belt, proposals should **support the delivery of** those compensatory improvements identified within the 'Green Belt Allocations: Compensatory Improvement Opportunities within remaining Green Belt' document or successor documents. These seek to offset the potential impacts of the allocation's development on the Green Belt environment and amenity of residents and visitors. Should alternative improvements be proposed these must be suitable and effective.*
- *The site has been identified as having potentially contaminated land. A detailed assessment of the extent of land contamination and identifying sufficient mitigation/remediation will be required at planning application stage.*
- *A Coal Mining Risk Assessment is required at the **outline** planning application stage where a **detailed** site layout is included. It should also identify any other mitigation, treatment and remediation measures that are necessary to ensure that the development is not subject to land instability or other public safety risks.*
- *The site is identified as being within 200m of a road exceeding an average trip generation of 19,000 trips per day. A detailed Air Quality Assessment will be required at planning application stage identifying sufficient mitigation measures.*
- *Site is within 250m of a historic landfill site. An assessment of the impact (including identifying any necessary mitigation/remediation works) will be required at planning application stage.*
- *Assessment will be required at planning application stage to determine the impact of the nearby Environment Agency waste permit site(s) and any mitigation required.*
- *A suitably detailed Heritage Statement **is required** that explains how potential archaeological impacts have been addressed will be required prior to the submission of any planning application. This will need to be informed by the results of a staged archaeological evaluation, with the results addressed by the design of the scheme. The resulting development proposal can then avoid or minimise harm to the significance of identified archaeology and heritage assets and their settings.*
- *In accordance with policy NC1, the masterplanning of the site must include mitigation measures that address any significant visual and landscape impacts whilst enabling integration with the surrounding area.*
- *Explore opportunities to provide ecological corridors having regard to the Local Nature Recovery Network. Where feasible, Biodiversity Net Gain should be delivered on site within these areas in the first case, in line with the BNG hierarchy.*
- *A minimum 15m buffer is required to the adjacent Waverley Pond and Handsworth Tip Local Wildlife Sites.*

Examination of the Sheffield Local Plan

- *Subject to further transport assessment work, access to the highway will be required off Orgreave Lane and/or Highfield Lane.*
- *Highways improvements to the Retford Road / Beaver Hill Road junction, identified within the Infrastructure Delivery Plan, will be required **in line with the associated impacts**.*
- *Contributions may be required to highways improvements at junctions on the strategic and local road network.*

2.3.2 Overall, we are supportive of the Local Plan. The suggested amendments identified above are considered minor in terms of the text amendments or points of clarification and are therefore considered non-material in nature.

3. Other Modifications Sought

3.1.1 Norfolk Estates have provided representations throughout the Local Plan to ensure that it is Sound. It is considered the Main Modifications make this Plan sound in relation to SES29. We have further comments to make in respect of the proposed modifications to Policy NC3 and minor modifications to the wording of Policy SA5. Comments on each Policy are provided below.

3.2 Policy NC3: Provision of Affordable Housing

3.2.1 Policy NC3 sets out the Affordable Housing Policy, for which they have been significant changes in the Main Modifications of the Plan. The changes include the addition of the newly allocated Green Belt sites with the additional +15% Golden Rules applied to them, and for Affordable Housing to be as a percentage of Gross Internal floor Area (GIA) of the development across all residential development.

3.2.2 We support the inclusion of the Golden Rules and tenure mix in terms of affordable provision.

3.2.3 We consider a text amendment needs to be added throughout the Policy through the inclusion of the word 'residential' adding before 'development' to ensure it does not conflate the need for Affordable Housing on employment sites.

3.2.4 However, we object to the proposed modification to Policy NC3 insofar as it expresses the affordable housing requirement as **a percentage of the gross internal floor area of the development, rather than by reference to the number of dwellings / homes**. This is not justified through a lack of proportionate evidence³.

3.2.5 We have concerns on how such a policy would work in practice, and whether it inadvertently increases the level of affordable housing. We set this out below.

Procedural Issues

3.2.6 When the Sheffield Local Plan was submitted for Examination there were no residential sites allocated for development on greenfield land outside of settlements. As such, a limited number of housebuilders had a material interest in more detailed aspects of the Plan, such as development management policies. Consequently, the focus of Representations was on the housing need and supply, and not with the consideration of residential development management policies. This has resulted in the assessment of Policy NC3 being limited.

3.2.7 Furthermore, the evidence base which supports the Local Plan, including the Whole Plan Viability Assessment⁴ and the Local Housing Needs Assessment⁵, only consider affordable housing on a per unit basis. The policy cannot therefore be considered Justified as it is not based on the evidence.

3.2.8 In addition, there is a lack of a precedent of such a policy approach. We are not aware of any adopted Local Plan which applies a percentage of GIA for affordable housing across all development types. Therefore, there is no known examples of how such a policy could be applied.

3.2.9 Despite this, there is no official guidance note or evidence base which assesses and explains how this policy would work in real terms. This is therefore not Justified. Given this, such a change is not appropriate to bring through Main Modifications.

³ Ministry of Housing, Communities and Local Government, National Planning Policy Framework (September 2023), Paragraph 35

⁴ Sheffield City Council, Whole Plan Viability Assessment – Further Note (May 2025)

⁵ Icen, Sheffield Local Housing Needs Assessment (September 2024)

Practicality

- 3.2.10 Affordable Housing on a percentage of GIA basis has not considered on how it would be applied in practice, especially in respect to land being promoted by parties who won't be the ultimate developer and would therefore seek an outline application.
- 3.2.11 Typically, sites which have been promoted by parties who are not housebuilders, or large sites which require development to be phased, will submit with matters such as detailed design being reserved for future consideration. However, at this stage in the planning process the extent of Affordable Housing will be agreed through a Section 106 agreement.
- 3.2.12 Moreover, the final quantum of GIA for affordable housing required will not be known until the GIA of the development is fixed. This could slow down land deals as the final agreement will be subject to changes at planning stage which adds in extra stages when compared to a per unit basis. This could therefore slow down the delivery of much needed housing.
- 3.2.13 Whilst appropriate wording could resolve this, it could nevertheless cause issues with S73 applications and other variations which at each stage could require a variation to the S106 agreement and land agreements. This risks adding extra work and therefore additional time to when sites can make a material start which could therefore impact on the timescale and number of dwellings delivered in the Plan period.
- 3.2.14 In addition, there is no evidence within the Local Plan which considers whether affordable housing on a per sqm basis would increase the level of affordable housing in practice. On greenfield sites, the average house size is typically larger than that of an affordable house due to affordable housing typically based on NDSS sizes, and the market need for housing being for larger bedroom sizes. This could inadvertently increase the affordable housing requirement.

Conclusion

- 3.2.15 Overall, the significant change has not gone through sufficient testing to understand how the policy would be applied in practice and the impacts this could have on delivery rates. As such, it is not an appropriate strategy which is based on proportionate evidence and is therefore not Justified in line with the NPPF definition.

3.3 Policy SA5: Southeast Sheffield Sub-Area

- 3.3.1 We are supportive of Policy SA5, the inclusion of SES29 on the list of allocations and the strategy it sets out for Southeast Sheffield.
- 3.3.2 However, we have one Minor Modification suggestion to the second part of Policy SA5 'b)' which deals with those allocation which are also 'strategic'. SES29 is a strategic allocation, but it is not also included on the strategic list of sites. We consider this is a typo. We consider the can be remedied through adding SES29 into the list of Strategic Sites.

4. Conclusion

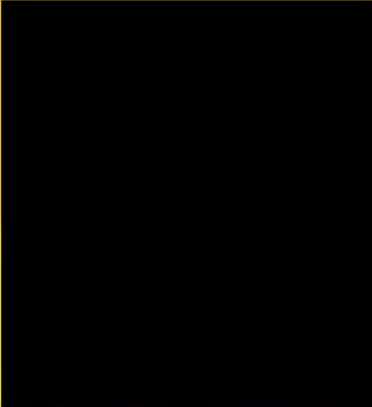
- 4.1 These Representations on the Main Modifications of the Sheffield Local Plan have been prepared by Savills (UK) Ltd on behalf of Norfolk Estates. The representations seek to ensure the Main Modifications to the Sheffield Local Plan are sound through being positively prepared, justified, effective, and consistent with national policy.
- 4.2 The representations are supportive of the Main Modification to the Local Plan, including to Allocation SES29 once minor modifications are made. The summary of the proposed changes are set out in Table 4.1 below.

Table 4.1 - Summary of Modifications Sought

MM Ref	Policy	Modifications Sought
MM68	Policy SA5	Minor text amendment to Policy text
MM127	Policy NC3	Affordable Housing to be on per unit basis
MM128	Policy NC3	Affordable Housing to be on per unit basis
MM410	Site Allocation SES29	Minor amendments to text on 'Condition on Development'

- 4.3 We welcome the opportunity to maintain engagement in the preparation of the new Local Plan and would be happy to discuss any of the points raised within these representations.

Contact

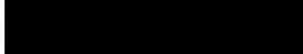


Offices in
Savills company name and address
Registered company details



REF5.0120

Objection to the proposed main modifications to the Sheffield local plan. Site SS19

From Gary Johns 
Date Mon 2026-04-27 12:04 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>



Re SS19

Dear Strategic Planning Team,

I am writing to object to the proposed Main Modifications to the Sheffield Local Plan, and particularly those that impact site SS19. While I recognise the need for a sound and deliverable plan, several of the modifications materially weaken safeguards that are essential for public safety, statutory compliance, and the fair distribution of development impacts across the city.

For these reasons, the proposed modifications fail to meet the tests of soundness set out in paragraph 36 of the National Planning Policy Framework (NPPF), specifically that the Plan must be justified, effective, and consistent with national policy.

I therefore set out below my objections to specific modifications.

MM7- This reframes the purpose of the Green Belt by highlighting only its role in supporting urban regeneration, while omitting the full set of Green Belt purposes set out in the NPPF. This narrow and reductive wording misrepresents national policy, weakens the strategic function of the Green Belt, and risks distorting future decision-making by implying that regeneration is its primary or sole purpose. Sheffield's Green Belt prevents sprawl and safeguards the countryside, yet MM7's selective emphasis creates an imbalanced narrative that could be used to justify further releases. The modification is therefore not justified, not effective, and should be amended to reflect the complete statutory purposes of the Green Belt.

Further to this, paragraph 5.9.8 of the Impact Assessment Report Addendum: Modifications Consultation (referred to in this document as IIA from this point, which can be found [here](#)) confirms that 'permanent negative effects would remain' on the environment and landscape character of SS19 as a result of its development. The assessment also confirms in paragraph 5.9.12 that the moderation of allocating green belt sites for development will have predominantly negative effects that will be difficult to fully mitigate.

MM10 MM11 MM90-MM93 - The Sheffield Local Plan relies on a significant windfall allowance of 7,475 homes out of a total supply of 39,159 homes (MM90), equating to approximately 19% of the overall housing supply.

This represents a substantial proportion of housing delivery being dependent on unallocated and uncertain sites, which by definition are not plan-led. The Plan does not provide sufficient evidence to demonstrate that this level of windfall delivery will be realised in a consistent, sustainable, or timely manner.

MM92 defines that the housing trajectory shows that the Sheffield Local Plan delivers only 298 dwellings above the identified requirement of 38,020 homes.

This represents a margin of less than 1% across the entire plan period, providing no meaningful flexibility to account for delays, non-delivery, viability issues, or infrastructure constraints. This is particularly concerning given the Plan provides only a very small margin above its housing requirement, meaning any shortfall in windfall delivery would result in the Plan failing to meet its targets.

MM18- With SS19 being one of the first green belt sites to be developed, and a year 7 place deficit until 2028/29, this does not provide the assurance that there will be adequate educational provision in the S12 area. Paragraph 3.2.3 of the Integrated Impact Assessment Report Addendum: Modifications Consultation (document [here](#)) states that, if a city centre school was built, it would be unlikely to be ready in time for the forecast peak deficit in places, weakening this mitigation further still. The moderation also fails to address how the educational needs of a post 16 student population, which continues to rise and will peak in 2028/29, will be met. This is a particular concern for S12 as the population will increase significantly with the planned development and south-east Sheffield has no post-16 provision.

There are also significant concerns about primary school provision across the S12 area, with Charnock Primary Academy (the primary school closest to SS19) already being oversubscribed by 33% (Sheffield City Council, 2025). The plan proposes the development of approximately 1,600 new homes in this part of the city (Draft Sheffield Local Plan Interactive Map and Sheffield Additional Site Allocations), growth that would ordinarily require a new primary school if delivered as a single strategic development. However the plan fails to demonstrate that essential education infrastructure can support the proposed level of growth.

MM19- The wording “include consideration” is non-binding and fails to secure delivery. The modification does not commit to a new facility, which is not allocated a site, and does not address the spatial mismatch between need and provision. S12, which lies outside the Central Sub-Area, is expected to absorb significant residential growth with just one extra consultation room being allocated to the area in the plan, despite having pockets of high deprivation and subsequent poor health outcomes. MM19 does not demonstrate how healthcare needs arising from this growth will be met, and fails the NPPF tests of effectiveness and justification, and risks exacerbating health inequalities unless strengthened.

Concerns around the impact of development on health and wellbeing are supported by the revised IIA (which can be found [here](#)) which states that ‘some new site allocations may reduce the overall amenity experienced by nearby residents. Although the Plan already includes measures to minimise these effects, it is unlikely that all remaining negative impacts can be fully avoided’. Paragraph 5.2.2 of this document also acknowledges that removal of greenbelt will have ‘some negative effects in terms of mental health and wellbeing’ on surrounding communities.

MM20 -The phrase “wherever practicable” is unacceptably ambiguous in a policy area that is critical to sustainable development and infrastructure delivery. It provides no commitment or assurance that transport improvements will be secured. The modification fails the NPPF tests of effectiveness and clarity, and risks undermining modal shift, accessibility, and safety objectives. It also weakens the plan’s ability to secure equitable outcomes across sub-areas. The wording must be replaced with a firm commitment to secure transport improvements proportionate to development scale and impact, supported by planning obligations and the Infrastructure Delivery Plan.

This is particularly important for the S12 area, where transport is a significant concern in relation to the scale of development proposed. The Sheffield Local Plan identifies approximately 1,600 new homes across S12, which will inevitably generate a substantial increase in traffic movements and place additional pressure on an already constrained local road network. However, due to the dispersed spatial distribution of these allocations, there is currently no clear or coordinated transport strategy demonstrating how the cumulative impact of these developments will be mitigated.

The plan does not provide sufficient detail regarding required junction improvements, public transport capacity, pedestrian and cycling infrastructure, or wider highway mitigation measures necessary to support this level of growth. Without clear and deliverable transport commitments, there is a risk that the cumulative traffic impacts will significantly worsen congestion, reduce road safety, and undermine the sustainability of the area. Paragraph 5.6.5. If the IIA states that site SS19 ‘benefits from its proximity to the blue tram route and a high-frequency bus corridor’, however, the lived experience of current residents is that this route is already under pressure during peak times and buses are infrequent and unreliable. As such, it is unclear how the proposed level of housing growth in S12 can be accommodated without substantial and clearly defined transport infrastructure improvements.

MM127 & MM128- The Plan suggests that Green Belt windfall sites could deliver up to 50% affordable housing, but there is no evidence this is achievable in practice. In fact, the Council’s own evidence shows that sites like SS19 are only likely to deliver around 30% affordable housing. This creates a clear gap between what the policy promises and what can actually be delivered.

The Plan also relies on “windfall” sites to deliver higher levels of affordable housing. However, windfall sites are uncertain and cannot be guaranteed to come forward, or to deliver the infrastructure and affordable housing needed.

This means the Plan is relying on outcomes that may never happen, while still allowing development on Green Belt land.

The Council's own housing needs evidence shows that the majority of housing need in Sheffield is for affordable housing. However, the Plan relies on sites such as SS19 that are only likely to deliver around 30% affordable housing, alongside uncertain windfall development. This fails to align with the identified need and undermines the justification for releasing Green Belt land. As a result, the approach is not justified, not reliable, and does not provide confidence that the promised affordable housing will be delivered.

MM224 MM 227- These modifications recognise that some sites have constraints (such as flood risk, access issues, and environmental limits), but there is no evidence of any level of recalculation to ascertain the reduction in buildable area and therefore reduction of the number of homes expected from those sites.

This raises concerns that the Plan is overestimating how many homes can actually be delivered. If parts of sites cannot be built on, the total housing numbers should be reduced accordingly.

In the case of sites such as SES13, the Plan acknowledges the need for buffers but does not reassess how this affects the number of homes the site can deliver.

More worryingly, SS19 is not included in these modifications even with significant constraints, including flood risk and the ecological corridor as well as additional buffers for the brook and hedgerows, this creates a risk that the Plan is relying on housing numbers that are not realistic, which undermines confidence that the overall housing target can be met & with such a low "buffer" of housing above the target, the plan could fail should the reality be reflected.

As a result, the Plan is not reliable, the modifications are not consistent across sites and does not provide a clear or accurate picture of what can actually be delivered.

MM429 (SS19) - The S12 Green Belt Action Group has submitted two previous consultation statements for MM429 (SS19) which highlight significant site constraints including flood risk and the ecological corridor, the need to protect the robin brook and its impact on the Moss Valley SSSI along with access constraints and hedgerow buffers but SS19 is not referenced in MM224 or MM227, which should require recalculation of housing impact across site allocations. This omission is concerning. If SS19's constraints are serious enough to warrant modification text, they should also trigger a reassessment of its contribution to housing supply. The failure to cross-reference SS19 in the impact recalculation undermines the credibility of the housing trajectory and suggests that constraint-driven reductions are not being applied consistently. This raises soundness concerns under NPPF paragraph 36(b) and (c): the plan may not be justified or effective if constrained sites are retained without transparent recalibration. The inconsistency also risks undermining spatial equity, as less constrained sites may be overburdened to compensate for undeliverable allocations like SS19.

It is also apparent that even with amended brook buffers and hedgerow buffers, the appropriate buffering has not been removed from the developable area, it is believed this will have an impact on the number of houses that are deliverable on the site and therefore impact the viability of the site.

The modifications also fail to consider the impact of North East Derbyshire District Council's Local Plan, particularly its proposed allocation immediately adjacent to SS19 (site reference 45900), which could deliver a further 348 homes alongside shops or a care facility. It is significant that the landowner, promoter and developer for site 45900 are the same as for SS19, yet NEDDC has assessed 45900 as unsuitable for development due to the same constraints repeatedly raised in relation to SS19.

The development of 45900 would create a single, continuous cross-boundary block of development that would clearly conflict with several of the Green Belt purposes set out in national policy: they would **fail to check the unrestricted sprawl** of the existing built-up area, **erode the separation between Sheffield and North East Derbyshire**, and **constitute significant countryside encroachment**. The two developments would effectively double the size of the Charnock estate with no planned proportionate infrastructure to support this rapid growth.

There appears to have been no meaningful collaboration with Sheffield City Council to assess the combined effects of these neighbouring proposals. The absence of any cross-boundary assessment represents a clear gap in the evidence base and undermines the justification for retaining SS19 in the plan.

This raises serious concerns regarding compliance with the Duty to Cooperate and further undermines the soundness of the Plan.

In conclusion, the main modifications do not adequately address the constraints and concerns highlighted in previous consultations, or during the public hearings. For the plan to be sound, it depends on modifications being made, however those proposed are vague and lack the detail to demonstrate that they are specific, credible, deliverable or proportionate to the scale of the development in the area.

This fails to align with paragraph 42 of the NPPF which states that 'the more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits'.

I therefore urge the Inspectors to require further modifications, including the removal or reassessment of SS19, to ensure the Plan is sound

I appreciate the opportunity to comment and urge the Inspectors and the Council to reconsider the Main Modifications to ensure the Local Plan remains robust, equitable, and fit for purpose.

Yours sincerely,

Mr Gary Johns





REF5.0121

Sheffield Plan.

From Brian & Barbara Parkin [REDACTED]
Date Mon 2026-04-27 12:20 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

The proposed plan to build houses etc on S13 greenbelt land is very flawed. Taking so much of the greenbelt is leaving very little for future generations to enjoy.
It is a disgraceful proposal when many other areas are untouched.
The traffic in the area has slowed down already due to alterations to the Handsworth road and Rotherham road junction.
Very little consideration has been undertaken to the wishes of the community.
Brian Parkin [REDACTED] resident of S13 since 1967.

Sent from my iPhone

REF5.0122

Objection to the proposed main modifications to the Sheffield local plan - site SS19

From Chelsea Herring [REDACTED]
Date Mon 2026-04-27 1:48 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Strategic Planning Team,

I am writing to object to the proposed Main Modifications to the Sheffield Local Plan, and particularly those that impact site SS19. While I recognise the need for a sound and deliverable plan, several of the modifications materially weaken safeguards that are essential for public safety, statutory compliance, and the fair distribution of development impacts across the city. For these reasons, the proposed modifications fail to meet the tests of soundness set out in paragraph 36 of the National Planning Policy Framework (NPPF), specifically that the Plan must be justified, effective, and consistent with national policy. I therefore set out below my objections to specific modifications.

MM7- This reframes the purpose of the Green Belt by highlighting only its role in supporting urban regeneration, while omitting the full set of Green Belt purposes set out in the NPPF. This narrow and reductive wording misrepresents national policy, weakens the strategic function of the Green Belt, and risks distorting future decision-making by implying that regeneration is its primary or sole purpose. Sheffield's Green Belt prevents sprawl and safeguards the countryside, yet MM7's selective emphasis creates an imbalanced narrative that could be used to justify further releases. The modification is therefore not justified, not effective, and should be amended to reflect the complete statutory purposes of the Green Belt. Further to this, paragraph 5.9.8 of the Impact Assessment Report Addendum: Modifications Consultation (referred to in this document as IIA from this point) confirms that 'permanent negative effects would remain' on the environment and landscape character of SS19 as a result of its development. The assessment also confirms in paragraph 5.9.12 that the moderation of allocating green belt sites for development will have predominantly negative effects that will be difficult to fully mitigate.

MM10 MM11 MM90-MM93 - The Sheffield Local Plan relies on a significant windfall allowance of 7,475 homes out of a total supply of 39,159 homes (MM90), equating to approximately 19% of the overall housing supply. This represents a substantial proportion of housing delivery being dependent on unallocated and uncertain sites, which by definition are not plan-led. The Plan does not provide sufficient evidence to demonstrate that this level of windfall delivery will be realised in a consistent, sustainable, or timely manner.

MM92 defines that the housing trajectory shows that the Sheffield Local Plan delivers only 298 dwellings above the identified requirement of 38,020 homes. This represents a margin of less than 1% across the entire plan period, providing no meaningful flexibility to account for delays, non-delivery, viability issues, or infrastructure constraints. This is particularly concerning given the Plan provides only a very small margin above its housing requirement, meaning any shortfall in windfall delivery would result in the Plan failing to meet its targets.

MM18- With SS19 being one of the first green belt sites to be developed, and a year 7 place deficit until 2028/29, this does not provide the assurance that there will be adequate educational provision in the S12 area. Paragraph 3.2.3 of the Integrated Impact Assessment Report Addendum: Modifications Consultation document states that, if a city centre school was built, it would be unlikely to be ready in time for the forecast peak deficit in places, weakening this mitigation further still. The moderation also fails to address how the

educational needs of a post 16 student population, which continues to rise and will peak in 2028/29, will be met. This is a particular concern for S12 as the population will increase significantly with the planned development and south-east Sheffield has no post-16 provision. There are also significant concerns about primary school provision across the S12 area, with Charnock Primary Academy (the primary school closest to SS19) already being oversubscribed by 33% (Sheffield City Council, 2025). The plan proposes the development of approximately 1,600 new homes in this part of the city (Draft Sheffield Local Plan Interactive Map and Sheffield Additional Site Allocations), growth that would ordinarily require a new primary school if delivered as a single strategic development. However the plan fails to demonstrate that essential education infrastructure can support the proposed level of growth. MM19- The wording "include consideration" is non-binding and fails to secure delivery. The modification does not commit to a new facility, which is not allocated a site, and does not address the spatial mismatch between need and provision. S12, which lies outside the Central Sub-Area, is expected to absorb significant residential growth with just one extra consultation room being allocated to the area in the plan, despite having pockets of high deprivation and subsequent poor health outcomes. MM19 does not demonstrate how healthcare needs arising from this growth will be met, and fails the NPPF tests of effectiveness and justification, and risks exacerbating health inequalities unless strengthened. Concerns around the impact of development on health and wellbeing are supported by the revised IIA document which states that 'some new site allocations may reduce the overall amenity experienced by nearby residents. Although the Plan already includes measures to minimise these effects, it is unlikely that all remaining negative impacts can be fully avoided'. Paragraph 5.2.2 of this document also acknowledges that removal of greenbelt will have 'some negative effects in terms of mental health and wellbeing' on surrounding communities. MM20 -The phrase "wherever practicable" is unacceptably ambiguous in a policy area that is critical to sustainable development and infrastructure delivery. It provides no commitment or assurance that transport improvements will be secured. The modification fails the NPPF tests of effectiveness and clarity, and risks undermining modal shift, accessibility, and safety objectives. It also weakens the plan's ability to secure equitable outcomes across sub-areas. The wording must be replaced with a firm commitment to secure transport improvements proportionate to development scale and impact, supported by planning obligations and the Infrastructure Delivery Plan. This is particularly important for the S12 area, where transport is a significant concern in relation to the scale of development proposed. The Sheffield Local Plan identifies approximately 1,600 new homes across S12, which will inevitably generate a substantial increase in traffic movements and place additional pressure on an already constrained local road network. However, due to the dispersed spatial distribution of these allocations, there is currently no clear or coordinated transport strategy demonstrating how the cumulative impact of these developments will be mitigated. The plan does not provide sufficient detail regarding required junction improvements, public transport capacity, pedestrian and cycling infrastructure, or wider highway mitigation measures necessary to support this level of growth. Without clear and deliverable transport commitments, there is a risk that the cumulative traffic impacts will significantly worsen congestion, reduce road safety, and undermine the sustainability of the area. Paragraph 5.6.5. If the IIA states that site SS19 'benefits from its proximity to the blue tram route and a high-frequency bus corridor', however, the lived experience of current residents is that this route is already under pressure during peak times and buses are infrequent and unreliable. As such, it is unclear how the proposed level of housing growth in S12 can be accommodated without substantial and clearly defined transport infrastructure improvements.

MM127 & MM128- The Plan suggests that Green Belt windfall sites could deliver up to 50% affordable housing, but there is no evidence this is achievable in practice. In fact, the Council's own evidence shows that sites like SS19 are only likely to deliver around 30% affordable housing. This creates a clear gap between what the policy promises and what can actually be delivered. The Plan also relies on "windfall" sites to deliver higher levels of affordable housing. However, windfall sites are uncertain and cannot be guaranteed to come

forward, or to deliver the infrastructure and affordable housing needed. This means the Plan is relying on outcomes that may never happen, while still allowing development on Green Belt land. The Council's own housing needs evidence shows that the majority of housing need in Sheffield is for affordable housing. However, the Plan relies on sites such as SS19 that are only likely to deliver around 30% affordable housing, alongside uncertain windfall development. This fails to align with the identified need and undermines the justification for releasing Green Belt land. As a result, the approach is not justified, not reliable, and does not provide confidence that the promised affordable housing will be delivered. MM224 MM 227- These modifications recognise that some sites have constraints (such as flood risk, access issues, and environmental limits), but there is no evidence of any level of recalculation to ascertain the reduction in buildable area and therefore reduction of the number of homes expected from those sites. This raises concerns that the Plan is overestimating how many homes can actually be delivered. If parts of sites cannot be built on, the total housing numbers should be reduced accordingly. In the case of sites such as SES13, the Plan acknowledges the need for buffers but does not reassess how this affects the number of homes the site can deliver. More worryingly, SS19 is not included in these modifications even with significant constraints, including flood risk and the ecological corridor as well as additional buffers for the brook and hedgerows, this creates a risk that the Plan is relying on housing numbers that are not realistic, which undermines confidence that the overall housing target can be met & with such a low "buffer" of housing above the target, the plan could fail should the reality be reflected.

As a result, the Plan is not reliable, the modifications are not consistent across sites and does not provide a clear or accurate picture of what can actually be delivered. MM429 (SS19) - The S12 Green Belt Action Group has submitted two previous consultation statements for MM429 (SS19) which highlight significant site constraints including flood risk and the ecological corridor, the need to protect the robin brook and its impact on the Moss Valley SSSI along with access constraints and hedgerow buffers but SS19 is not referenced in MM224 or MM227, which should require recalculation of housing impact across site allocations. This omission is concerning. If SS19's constraints are serious enough to warrant modification text, they should also trigger a reassessment of its contribution to housing supply. The failure to cross-reference SS19 in the impact recalculation undermines the credibility of the housing trajectory and suggests that constraint-driven reductions are not being applied consistently. This raises soundness concerns under NPPF paragraph 36(b) and (c): the plan may not be justified or effective if constrained sites are retained without transparent recalibration. The inconsistency also risks undermining spatial equity, as less constrained sites may be overburdened to compensate for undeliverable allocations like SS19. It is also apparent that even with amended brook buffers and hedgerow buffers, the appropriate buffering has not been removed from the developable area, it is believed this will have an impact on the number of houses that are deliverable on the site and therefore impact the viability of the site. The modifications also fail to consider the impact of North East Derbyshire District Council's Local Plan, particularly its proposed allocation immediately adjacent to SS19 (site reference 45900), which could deliver a further 348 homes alongside shops or a care facility. It is significant that the landowner, promoter and developer for site 45900 are the same as for SS19, yet NEDDC has assessed 45900 as unsuitable for development due to the same constraints repeatedly raised in relation to SS19. The development of 45900 would create a single, continuous cross-boundary block of development that would clearly conflict with several of the Green Belt purposes set out in national policy: they would fail to check the unrestricted sprawl of the existing built-up area, erode the separation between Sheffield and North East Derbyshire, and constitute significant countryside encroachment. The two developments would effectively double the size of the Charnock estate with no planned proportionate infrastructure to support this rapid growth. There appears to have been no meaningful collaboration with Sheffield City Council to assess the combined effects of these neighbouring proposals.

Yours sincerely
Chelsea Herring

REF5.0123

Main Modifacation Sheffield Local Plan Site NES39 Wheel/Middleton Lane Objection

From Helen Doncaster [REDACTED]
Date Mon 2026-04-27 3:55 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Strategic Planning Team,

I am writing to express my objection to the proposed Main Modifications to the Sheffield Local Plan, specifically in relation to Site NES39 land of Wheel lane and Middleton Lane.

I note that Parcels B and C have been removed from the plan on the basis that they are described as "particularly attractive" and that they "make a strong contribution to the character and setting of the local area," with development likely to cause "significant landscape/visual harm."

While this assessment is entirely valid for Parcels B and C, it applies equally to Parcel A. This land is home to endangered species and includes acid grassland, mature trees, historic hedgerows, and drystone walls dating back to the before the 1770s. In both ecological and landscape terms, Parcel A is just as "particularly attractive" and makes an equally strong contribution to the character of the area as the other parcels. Its development would likewise result in "significant landscape/visual harm."

Development on Parcel A would significantly affect the "strong contribution to the character and setting of the local area." The fields at NES39 function as a single, connected ecosystem, and cannot be considered in isolation. Development on one parcel will inevitably impact the others and would "cause significant landscape/visual harm" across the wider site. Furthermore, construction activity and its long-term effects are not contained within a single field. Given the natural eastward slope of Parcel A, surface runoff would drain into Parcels B and C, described as "open fields sloping down to a river valley." This creates a clear risk that both the fields and the river valley would be adversely affected by pollution resulting from the development.

Endangered species, including bats, woodpeckers, curlew, adders, hedgehogs and greenfinches, among many others all depend on this land as their habitat. What specific assessments and safeguards have been put in place to ensure these species are protected during any proposed development?

It is not enough just to say "the Golden Rules apply". If the Council is relying on those rules to justify Green Belt release, it should show clearly what they mean in practice for these sites and how they can actually be delivered.

The Council's own appraisal says the Main Modifications make the Plan worse for soil and land, landscape, biodiversity and transport. That is not my claim - it is in the Council's own IIA.

These are not minor tidying-up changes. The Council's own consultants say the

Main Mods were significant enough to need further appraisal because they change the spatial strategy, release Green Belt, and additional school, burial and habitat-related consequences.

The release of Green Belt land is not necessary. The Save Chapeltown, Ecclesfield and Grenoside Green Belt campaign group has conducted a review of brownfield sites across Sheffield and identified a substantial number of viable alternatives for housing and warehouse development (see Exam 141). This evidence demonstrates that sufficient capacity exists within brownfield land to meet the requirements of the Sheffield Local Plan, without the need to develop Green Belt sites.

Exam 141 - https://d282b3ca-4277-4cc4-942b-3aeaef3043d5.filesusr.com/ugd/4446b7_30899ea20da14cc6a24f6225f189c0a7.pdf

In conclusion, the release of Green Belt land in Sheffield is not necessary, and there is clear evidence to support this. There is a strong and growing community committed to protecting this protected land, and we urge the Council and developers to prioritise the use of brownfield sites first. The key question remains: will the Council listen to the people of Sheffield and act to preserve the Green Belt, or risk repeating history such as the street trees campaign?

Yours faithfully,

Helen Doncaster



REF5.0124

Objection to the Proposed Main Modifications to the Sheffield Local Plan - site SS19

From Deborah Hitchen [REDACTED]
Date Mon 2026-04-27 4:54 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Strategic Planning Team,

I am writing to object to the proposed Main Modifications to the Sheffield Local Plan, and particularly those that impact site SS19. While I recognise the need for a sound and deliverable plan, several of the modifications materially weaken safeguards that are essential for public safety, statutory compliance, and the fair distribution of development impacts across the city.

For these reasons, the proposed modifications fail to meet the tests of soundness set out in paragraph 36 of the National Planning Policy Framework (NPPF), specifically that the Plan must be justified, effective, and consistent with national policy.

I therefore set out below my objections to specific modifications.

MM7- This reframes the purpose of the Green Belt by highlighting only its role in supporting urban regeneration, while omitting the full set of Green Belt purposes set out in the NPPF. This narrow and reductive wording misrepresents national policy, weakens the strategic function of the Green Belt, and risks distorting future decision-making by implying that regeneration is its primary or sole purpose. Sheffield's Green Belt prevents sprawl and safeguards the countryside, yet MM7's selective emphasis creates an imbalanced narrative that could be used to justify further releases. The modification is therefore not justified, not effective, and should be amended to reflect the complete statutory purposes of the Green Belt.

Further to this, paragraph 5.9.8 of the Impact Assessment Report Addendum: Modifications Consultation (referred to in this document as IIA from this point, which can be found [here](#)) confirms that 'permanent negative effects would remain' on the environment and landscape character of SS19 as a result of its development. The assessment also confirms in paragraph 5.9.12 that the moderation of allocating green belt sites for development will have predominantly negative effects that will be difficult to fully mitigate.

MM10 MM11 MM90-MM93 - The Sheffield Local Plan relies on a significant windfall allowance of 7,475 homes out of a total supply of 39,159 homes (MM90), equating to approximately 19% of the overall housing supply.

This represents a substantial proportion of housing delivery being dependent on unallocated and uncertain sites, which by definition are not plan-led. The Plan does not provide sufficient evidence to demonstrate that this level of windfall delivery will be realised in a consistent, sustainable, or timely manner.

MM92 defines that the housing trajectory shows that the Sheffield Local Plan delivers only 298 dwellings above the identified requirement of 38,020 homes.

This represents a margin of less than 1% across the entire plan period, providing no meaningful flexibility to account for delays, non-delivery, viability issues, or infrastructure constraints. This is particularly concerning given the Plan provides only a very small margin above its housing requirement, meaning any shortfall in windfall delivery would result in the Plan failing to meet its targets.

MM18- With SS19 being one of the first green belt sites to be developed, and a year 7 place deficit until 2028/29, this does not provide the assurance that there will be adequate educational provision in the S12 area. Paragraph 3.2.3 of the Integrated Impact Assessment Report Addendum: Modifications Consultation (document here) states that, if a city centre school was built, it would be unlikely to be ready in time for the forecast peak deficit in places, weakening this mitigation further still. The moderation also fails to address how the educational needs of a post 16 student population, which continues to rise and will peak in 2028/29, will be met. This is a particular concern for S12 as the population will increase significantly with the planned development and south-east Sheffield has no post-16 provision.

There are also significant concerns about primary school provision across the S12 area, with Charnock Primary Academy (the primary school closest to SS19) already being oversubscribed by 33% (Sheffield City Council, 2025). The plan proposes the development of approximately 1,600 new homes in this part of the city (Draft Sheffield Local Plan Interactive Map and Sheffield Additional Site Allocations), growth that would ordinarily require a new primary school if delivered as a single strategic development. However the plan fails to demonstrate that essential education infrastructure can support the proposed level of growth.

MM19- The wording “include consideration” is non-binding and fails to secure delivery. The modification does not commit to a new facility, which is not allocated a site, and does not address the spatial mismatch between need and provision. S12, which lies outside the Central Sub-Area, is expected to absorb significant residential growth with just one extra consultation room being allocated to the area in the plan, despite having pockets of high deprivation and subsequent poor health outcomes. MM19 does not demonstrate how healthcare needs arising from this growth will be met, and fails the NPPF tests of effectiveness and justification, and risks exacerbating health inequalities unless strengthened.

Concerns around the impact of development on health and wellbeing are supported by the revised IIA (which can be found here) which states that ‘some new site allocations may reduce the overall amenity experienced by nearby residents. Although the Plan already includes measures to minimise these effects, it is unlikely that all remaining negative impacts can be fully avoided’. Paragraph 5.2.2 of this document also acknowledges that removal of greenbelt will have ‘some negative effects in terms of mental health and wellbeing’ on surrounding communities.

MM20 -The phrase “wherever practicable” is unacceptably ambiguous in a policy area that is critical to sustainable development and infrastructure delivery. It provides no commitment or assurance that transport improvements will be secured. The modification fails the NPPF tests of effectiveness and clarity, and risks undermining modal shift, accessibility, and safety objectives. It also weakens the plan’s ability to secure equitable outcomes across sub-areas. The wording must be replaced with a firm commitment to secure transport improvements proportionate to development scale and impact, supported by planning obligations and the Infrastructure Delivery Plan.

This is particularly important for the S12 area, where transport is a significant concern in relation to the scale of development proposed. The Sheffield Local Plan identifies approximately 1,600 new homes across S12, which will inevitably generate a substantial increase in traffic movements and place additional pressure on an already constrained local road network. However, due to the dispersed spatial distribution of these allocations, there is currently no clear or coordinated transport strategy demonstrating how the cumulative impact of these developments will be mitigated.

The plan does not provide sufficient detail regarding required junction improvements, public transport capacity, pedestrian and cycling infrastructure, or wider highway mitigation measures necessary to support this level of growth. Without clear and deliverable transport commitments, there is a risk that the cumulative traffic impacts will significantly worsen congestion, reduce road safety, and undermine the sustainability of the area. Paragraph 5.6.5. If the IIA states that site SS19 'benefits from its proximity to the blue tram route and a high-frequency bus corridor', however, the lived experience of current residents is that this route is already under pressure during peak times and buses are infrequent and unreliable. As such, it is unclear how the proposed level of housing growth in S12 can be accommodated without substantial and clearly defined transport infrastructure improvements.

MM127 & MM128- The Plan suggests that Green Belt windfall sites could deliver up to 50% affordable housing, but there is no evidence this is achievable in practice. In fact, the Council's own evidence shows that sites like SS19 are only likely to deliver around 30% affordable housing. This creates a clear gap between what the policy promises and what can actually be delivered.

The Plan also relies on "windfall" sites to deliver higher levels of affordable housing. However, windfall sites are uncertain and cannot be guaranteed to come forward, or to deliver the infrastructure and affordable housing needed.

This means the Plan is relying on outcomes that may never happen, while still allowing development on Green Belt land.

The Council's own housing needs evidence shows that the majority of housing need in Sheffield is for affordable housing. However, the Plan relies on sites such as SS19 that are only likely to deliver around 30% affordable housing, alongside uncertain windfall development. This fails to align with the identified need and undermines the justification for releasing Green Belt land. As a result, the approach is not justified, not reliable, and does not provide confidence that the promised affordable housing will be delivered.

MM224 MM 227- These modifications recognise that some sites have constraints (such as flood risk, access issues, and environmental limits), but there is no evidence of any level of recalculation to ascertain the reduction in buildable area and therefore reduction of the number of homes expected from those sites.

This raises concerns that the Plan is overestimating how many homes can actually be delivered. If parts of sites cannot be built on, the total housing numbers should be reduced accordingly.

In the case of sites such as SES13, the Plan acknowledges the need for buffers but does not reassess how this affects the number of homes the site can deliver. More worryingly, SS19 is not included in these modifications even with significant constraints, including flood risk and the ecological corridor as well as additional buffers for the brook and hedgerows, this creates a risk that the Plan is relying on housing numbers that are not realistic, which undermines confidence that the overall housing target can be met & with such a low "buffer" of housing above the target, the plan could fail should the reality be reflected.

As a result, the Plan is not reliable, the modifications are not consistent across sites and does not provide a clear or accurate picture of what can actually be delivered.

MM429 (SS19) - The S12 Green Belt Action Group has submitted two previous consultation statements for MM429 (SS19) which highlight significant site constraints including flood risk and the ecological corridor, the need to protect the robin brook and its impact on the Moss Valley SSSI along with access constraints and hedgerow buffers but SS19 is not referenced in MM224 or MM227, which should require recalculation of housing impact across site allocations. This omission is concerning. If SS19's constraints are serious enough to warrant modification text, they should also

trigger a reassessment of its contribution to housing supply. The failure to cross-reference SS19 in the impact recalculation undermines the credibility of the housing trajectory and suggests that constraint-driven reductions are not being applied consistently. This raises soundness concerns under NPPF paragraph 36(b) and (c): the plan may not be justified or effective if constrained sites are retained without transparent recalibration. The inconsistency also risks undermining spatial equity, as less constrained sites may be overburdened to compensate for undeliverable allocations like SS19.

It is also apparent that even with amended brook buffers and hedgerow buffers, the appropriate buffering has not been removed from the developable area, it is believed this will have an impact on the number of houses that are deliverable on the site and therefore impact the viability of the site.

The modifications also fail to consider the impact of North East Derbyshire District Council's Local Plan, particularly its proposed allocation immediately adjacent to SS19 (site reference 45900), which could deliver a further 348 homes alongside shops or a care facility. It is significant that the landowner, promoter and developer for site 45900 are the same as for SS19, yet NEDDC has assessed 45900 as unsuitable for development due to the same constraints repeatedly raised in relation to SS19.

The development of 45900 would create a single, continuous cross-boundary block of development that would clearly conflict with several of the Green Belt purposes set out in national policy: they would fail to check the unrestricted sprawl of the existing built-up area, erode the separation between Sheffield and North East Derbyshire, and constitute significant countryside encroachment. The two developments would effectively double the size of the Charnock estate with no planned proportionate infrastructure to support this rapid growth.

There appears to have been no meaningful collaboration with Sheffield City Council to assess the combined effects of these neighbouring proposals. The absence of any cross-boundary assessment represents a clear gap in the evidence base and undermines the justification for retaining SS19 in the plan.

This raises serious concerns regarding compliance with the Duty to Cooperate and further undermines the soundness of the Plan.

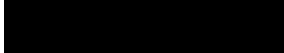
In conclusion, the main modifications do not adequately address the constraints and concerns highlighted in previous consultations, or during the public hearings. For the plan to be sound, it depends on modifications being made, however those proposed are vague and lack the detail to demonstrate that they are specific, credible, deliverable or proportionate to the scale of the development in the area. This fails to align with paragraph 42 of the NPPF which states that 'the more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits'.

I therefore urge the Inspectors to require further modifications, including the removal or reassessment of SS19, to ensure the Plan is sound.

I appreciate the opportunity to comment and urge the Inspectors and the Council to reconsider the Main Modifications to ensure the Local Plan remains robust, equitable, and fit for purpose.

Yours sincerely


Deborah and Glyn Hitchen



REF5.0125

SCS30 Representation

From Shannon Linfoot [REDACTED]
Date Mon 2026-04-27 4:55 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

 1 attachment (48 KB)
ses30_personal_reps shannon.pdf;

External email

To whom it may concern,

Please find attached my representation against the Sheffield plan.

Regards,
Shannon Linfoot

SHEFFIELD PLAN EXAMINATION

Main Modifications Consultation

Representation on Main Modification MM411 — Site Allocation SES30

Submitted by: Shannon Linfoot

Address: [REDACTED]

Email: [REDACTED]

Date: 25th April 2026

Consultation reference: MM411 / SES30

1. Introduction

I am [REDACTED] years old and have grown up on Bramley Lane in Sheffield S13. I walk and travel by car along Bramley Lane regularly. I am submitting this representation because I feel strongly about what the proposed development of site SES30 would mean for the area I have grown up in, and because I do not think the current version of the plan properly addresses the problems with this proposal.

2. Growing up between two villages

I have spent my whole life in this part of Sheffield. The open land between Handsworth and Woodhouse has always been part of what makes living here feel different to living in the middle of a city. You can walk out onto green fields and open countryside within minutes of your front door. That matters, especially to younger people who need outdoor space.

If SES30 is built, that separation between the two communities will be almost entirely gone. There would be nothing left between Handsworth and Woodhouse except a narrow strip of trees. Two places that have always had their own identities — their own shops, schools, community life — would effectively merge into one continuous built-up area. I do not think that loss has been taken seriously enough in the planning process. Once it happens, it cannot be undone.

The National Planning Policy Framework exists partly to stop exactly this kind of thing — the merging of distinct communities into one another. The green belt between Handsworth and Woodhouse exists for a reason. The exceptional circumstances needed to build on it have not, in my view, been convincingly demonstrated, particularly when the Council's own environmental assessment says the modifications make things worse for landscape and the environment.

3. Road safety on Bramley Lane

I use Bramley Lane on foot regularly and I know from personal experience how fast vehicles travel on it. It is genuinely unsafe to walk along in places, and crossing it requires real caution. Traffic monitoring data gathered independently on this road over a six-week period in early 2026 recorded more than 22,000 individual vehicle speed measurements and found that during normal conditions nearly two thirds of vehicles exceed the 20 mph limit. The 85th percentile speed — the speed at or below which 85% of drivers travel — was found to be above 40 mph on a road with a 20 mph limit.

These are not statistics that surprised me. Anyone who lives on or near Bramley Lane already knows it is driven far too fast. What does surprise me is that the plan for 827 new homes, a school and a burial ground on land that borders this road makes no mention of it at all. MM411 does not assess the impact on Bramley Lane, does not require any improvements to it, and

does not restrict access from it. A plan that proposes a major development adjacent to a road with these existing conditions and simply ignores those conditions is not a sound plan.

4. Flooding and mining risk

Flooding is already a problem in this area. Beaver Hill Road floods. The site has a watercourse running through it. Building on 35 hectares of currently open, permeable land and replacing it with roofs, roads and hard surfaces will make surface water run-off worse, not better. MM411 acknowledges flooding risk but defers dealing with it to the planning application stage. That is not reassuring to people who already experience flooding near their homes.

The ground under and around this site also has a history of coal mining. Old mine workings are present in the area. The modification says a Coal Mining Risk Assessment will be required when a planning application is submitted. That means the Council is proposing to allocate the site for 827 homes before anyone has established whether the ground is safe to build on. If the assessment later reveals significant problems, the whole capacity calculation collapses — and the justification for taking this land out of the green belt goes with it.

5. What I am asking for

I grew up here and I want this area to remain a place where the gap between Handsworth and Woodhouse still means something — where you can still see open land, where the communities still have their own character, and where the road I walk along every day is safe. None of those things are guaranteed by MM411 as it stands.

I am asking the Inspectors to look carefully at whether the flooding risk, the mining risk, the highway safety issues and the landscape harm have genuinely been resolved — or whether they have simply been deferred to later stages in the hope that they will somehow work out. The Council's own evidence says the modifications make the environmental performance of the plan *worse*. That should give the Inspectors serious pause before confirming an allocation of this scale on this land.

I consider Main Modification MM411 (site SES30) to be unsound. It is not justified, not effective, and not consistent with national policy. I request that SES30 be removed from the Plan and retained as Green Belt.

I request to be notified of the Inspectors' final report and the adoption of the Sheffield Plan.

Shannon Linfoot

[REDACTED]

25th April 2026

REF5.0126

Objection to the proposed main modifications to the Sheffield local plan. Site SS19

From Sarah Johns [REDACTED]
Date Mon 2026-04-27 7:08 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[REDACTED]

Re Site SS19

Dear Strategic Planning Team,

I am writing to object to the proposed Main Modifications to the Sheffield Local Plan, and particularly those that impact site SS19. While I recognise the need for a sound and deliverable plan, several of the modifications materially weaken safeguards that are essential for public safety, statutory compliance, and the fair distribution of development impacts across the city.

For these reasons, the proposed modifications fail to meet the tests of soundness set out in paragraph 36 of the National Planning Policy Framework (NPPF), specifically that the Plan must be justified, effective, and consistent with national policy.

I therefore set out below my objections to specific modifications.

MM7- This reframes the purpose of the Green Belt by highlighting only its role in supporting urban regeneration, while omitting the full set of Green Belt purposes set out in the NPPF. This narrow and reductive wording misrepresents national policy, weakens the strategic function of the Green Belt, and risks distorting future decision-making by implying that regeneration is its primary or sole purpose. Sheffield's Green Belt prevents sprawl and safeguards the countryside, yet MM7's selective emphasis creates an imbalanced narrative that could be used to justify further releases. The modification is therefore not justified, not effective, and should be amended to reflect the complete statutory purposes of the Green Belt.

Further to this, paragraph 5.9.8 of the Impact Assessment Report Addendum: Modifications Consultation (referred to in this document as IIA from this point, which can be found [here](#)) confirms that 'permanent negative effects would remain' on the environment and landscape character of SS19 as a result of its development. The assessment also confirms in paragraph 5.9.12 that the moderation of allocating green belt sites for development will have predominantly negative effects that will be difficult to fully mitigate.

MM10 MM11 MM90-MM93 - The Sheffield Local Plan relies on a significant windfall allowance of 7,475 homes out of a total supply of 39,159 homes (MM90), equating to approximately 19% of the overall housing supply.

This represents a substantial proportion of housing delivery being dependent on unallocated and uncertain sites, which by definition are not plan-led. The Plan does not provide sufficient evidence to demonstrate that this level of windfall delivery will be realised in a consistent, sustainable, or timely manner.

MM92 defines that the housing trajectory shows that the Sheffield Local Plan delivers only 298 dwellings above the identified requirement of 38,020 homes.

This represents a margin of less than 1% across the entire plan period, providing no meaningful flexibility to account for delays, non-delivery, viability issues, or infrastructure constraints. This is particularly concerning given the Plan provides only a very small margin above its housing requirement, meaning any shortfall in windfall delivery would result in the Plan failing to meet its targets.

MM18- With SS19 being one of the first green belt sites to be developed, and a year 7 place deficit until 2028/29, this does not provide the assurance that there will be adequate educational provision in the S12 area. Paragraph 3.2.3 of the Integrated Impact Assessment Report Addendum: Modifications Consultation (document [here](#)) states that, if a city centre school was built, it would be unlikely to be ready in time for the forecast peak deficit in places, weakening this mitigation further still. The moderation also fails to address how the educational needs of a post 16 student population, which continues to rise and will peak in 2028/29, will be met. This is a particular concern for S12 as the population will increase significantly with the planned development and south-east Sheffield has no post-16 provision.

There are also significant concerns about primary school provision across the S12 area, with Charnock Primary Academy (the primary school closest to SS19) already being oversubscribed by 33% (Sheffield City Council, 2025). The plan proposes the development of approximately 1,600 new homes in this part of the city (Draft Sheffield Local Plan Interactive Map and Sheffield Additional Site Allocations), growth that would ordinarily require a new primary school if delivered as a single strategic development. However the plan fails to demonstrate that essential education infrastructure can support the proposed level of growth.

MM19- The wording “include consideration” is non-binding and fails to secure delivery. The modification does not commit to a new facility, which is not allocated a site, and does not address the spatial mismatch between need and provision. S12, which lies outside the Central Sub-Area, is expected to absorb significant residential growth with just one extra consultation room being allocated to the area in the plan, despite having pockets of high deprivation and subsequent poor health outcomes. MM19 does not demonstrate how healthcare needs arising from this growth will be met, and fails the NPPF tests of effectiveness and justification, and risks exacerbating health inequalities unless strengthened.

Concerns around the impact of development on health and wellbeing are supported by the revised IIA (which can be found [here](#)) which states that ‘some new site allocations may reduce the overall amenity experienced by nearby residents. Although the Plan already includes measures to minimise these effects, it is unlikely that all remaining negative impacts can be fully avoided’. Paragraph 5.2.2 of this document also acknowledges that removal of greenbelt will have ‘some negative effects in terms of mental health and wellbeing’ on surrounding communities.

MM20 -The phrase “wherever practicable” is unacceptably ambiguous in a policy area that is critical to sustainable development and infrastructure delivery. It provides no commitment or assurance that transport improvements will be secured. The modification fails the NPPF tests of effectiveness and clarity, and risks undermining modal shift, accessibility, and safety objectives. It also weakens the plan’s ability to secure equitable outcomes across sub-areas. The wording must be replaced with a firm commitment to secure transport improvements proportionate to development scale and impact, supported by planning obligations and the Infrastructure Delivery Plan.

This is particularly important for the S12 area, where transport is a significant concern in relation to the scale of development proposed. The Sheffield Local Plan identifies approximately 1,600 new homes across S12, which will inevitably generate a substantial increase in traffic movements and place additional pressure on an already constrained local road network. However, due to the dispersed spatial distribution of these allocations, there is currently no clear or coordinated transport strategy demonstrating how the cumulative impact of these developments will be mitigated.

The plan does not provide sufficient detail regarding required junction improvements, public transport capacity, pedestrian and cycling infrastructure, or wider highway mitigation measures necessary to support this level of growth. Without clear and deliverable transport commitments, there is a risk that the cumulative traffic impacts will significantly worsen congestion, reduce road safety, and undermine the sustainability of the area. Paragraph 5.6.5. If the IIA states that site SS19 ‘benefits from its proximity to the blue tram route and a high-frequency bus corridor’, however, the lived experience of current residents is that this route is already under pressure during peak times and buses are infrequent and unreliable. As such, it is unclear how the proposed level of housing growth in S12 can be accommodated without substantial and clearly defined transport infrastructure improvements.

MM127 & MM128- The Plan suggests that Green Belt windfall sites could deliver up to 50% affordable housing, but there is no evidence this is achievable in practice. In fact, the Council’s own evidence shows that sites like SS19 are only likely to deliver around 30% affordable housing. This creates a clear gap between what the policy promises and what can actually be delivered.

The Plan also relies on “windfall” sites to deliver higher levels of affordable housing. However, windfall sites are uncertain and cannot be guaranteed to come forward, or to deliver the infrastructure and affordable housing needed.

This means the Plan is relying on outcomes that may never happen, while still allowing development on Green Belt land.

The Council's own housing needs evidence shows that the majority of housing need in Sheffield is for affordable housing. However, the Plan relies on sites such as SS19 that are only likely to deliver around 30% affordable housing, alongside uncertain windfall development. This fails to align with the identified need and undermines the justification for releasing Green Belt land. As a result, the approach is not justified, not reliable, and does not provide confidence that the promised affordable housing will be delivered.

MM224 MM 227- These modifications recognise that some sites have constraints (such as flood risk, access issues, and environmental limits), but there is no evidence of any level of recalculation to ascertain the reduction in buildable area and therefore reduction of the number of homes expected from those sites.

This raises concerns that the Plan is overestimating how many homes can actually be delivered. If parts of sites cannot be built on, the total housing numbers should be reduced accordingly.

In the case of sites such as SES13, the Plan acknowledges the need for buffers but does not reassess how this affects the number of homes the site can deliver.

More worryingly, SS19 is not included in these modifications even with significant constraints, including flood risk and the ecological corridor as well as additional buffers for the brook and hedgerows, this creates a risk that the Plan is relying on housing numbers that are not realistic, which undermines confidence that the overall housing target can be met & with such a low "buffer" of housing above the target, the plan could fail should the reality be reflected.

As a result, the Plan is not reliable, the modifications are not consistent across sites and does not provide a clear or accurate picture of what can actually be delivered.

MM429 (SS19) - The S12 Green Belt Action Group has submitted two previous consultation statements for MM429 (SS19) which highlight significant site constraints including flood risk and the ecological corridor, the need to protect the robin brook and its impact on the Moss Valley SSSI along with access constraints and hedgerow buffers but SS19 is not referenced in MM224 or MM227, which should require recalculation of housing impact across site allocations. This omission is concerning. If SS19's constraints are serious enough to warrant modification text, they should also trigger a reassessment of its contribution to housing supply. The failure to cross-reference SS19 in the impact recalculation undermines the credibility of the housing trajectory and suggests that constraint-driven reductions are not being applied consistently. This raises soundness concerns under NPPF paragraph 36(b) and (c): the plan may not be justified or effective if constrained sites are retained without transparent recalibration. The inconsistency also risks undermining spatial equity, as less constrained sites may be overburdened to compensate for undeliverable allocations like SS19.

It is also apparent that even with amended brook buffers and hedgerow buffers, the appropriate buffering has not been removed from the developable area, it is believed this will have an impact on the number of houses that are deliverable on the site and therefore impact the viability of the site.

The modifications also fail to consider the impact of North East Derbyshire District Council's Local Plan, particularly its proposed allocation immediately adjacent to SS19 (site reference 45900), which could deliver a further 348 homes alongside shops or a care facility. It is significant that the landowner, promoter and developer for site 45900 are the same as for SS19, yet NEDDC has assessed 45900 as unsuitable for development due to the same constraints repeatedly raised in relation to SS19.

The development of 45900 would create a single, continuous cross-boundary block of development that would clearly conflict with several of the Green Belt purposes set out in national policy: they would **fail to check the unrestricted sprawl** of the existing built-up area, **erode the separation between Sheffield and North East Derbyshire**, and **constitute significant countryside encroachment**. The two developments would effectively double the size of the Charnock estate with no planned proportionate infrastructure to support this rapid growth.

There appears to have been no meaningful collaboration with Sheffield City Council to assess the combined effects of these neighbouring proposals. The absence of any cross-boundary assessment represents a clear gap in the evidence base and undermines the justification for retaining SS19 in the plan.

This raises serious concerns regarding compliance with the Duty to Cooperate and further undermines the soundness of the Plan.

In conclusion, the main modifications do not adequately address the constraints and concerns highlighted in previous consultations, or during the public hearings. For the plan to be sound, it depends on modifications being made, however those proposed are vague and lack the detail to demonstrate that they are specific, credible, deliverable or proportionate to the scale of the development in the area.

This fails to align with paragraph 42 of the NPPF which states that 'the more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits'.

I therefore urge the Inspectors to require further modifications, including the removal or reassessment of SS19, to ensure the Plan is sound

I appreciate the opportunity to comment and urge the Inspectors and the Council to reconsider the Main Modifications to ensure the Local Plan remains robust, equitable, and fit for purpose.

Yours sincerely,

Mrs SL Johns





REF5.0127

Main Modification Consultation

From Roger Hardwick [REDACTED]
Date Tue 2026-04-28 12:35 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

To SheffieldPlan@sheffield.gov.uk

Main Modification Consultation
Reference MM411 (SES30)

Regarding Site SES30 - Bramley Lane / Beaver Hill Road (MM411) and the proposed allocation of 827 homes, a secondary school and a multi-faith burial ground on 35 hectares of Green Belt.

I consider the Council's proposals for SES30 unsound for the following reasons:

1.Access.

There is insufficient evidence from the council to demonstrate that practical and safe access can be achieved on Beaver Hill Road for this large development.

The already very busy Beaver hill Road will

be overwhelmed by the extra demands placed upon it by 827 new homes, a burial ground and a school, with an existing secondary school already situated on the same road.

Transport modelling by the Council indicates that the Retford Road / Beaver Hill Road junction would be at 98% capacity by 2039 leading to saturation and eventual gridlock.

In their development policy the council themselves indicate there are unresolved access issues and state that further assessment is required.

So how can this proposal be sound if the assessment is incomplete with key issues still unresolved?

2.Ecology.

Site SES30 is a sanctuary for wildlife. The council's proposed development will devastate the biodiversity there.

The Council's own ecological assessment (no protected species survey was done in advance of the site being proposed for development) suggests the site could be registered as a BNG habitat site on the national register, and assigns high importance to every area of habitat on the site. This appraisal hardly seems supportive of a house building plan that would destroy the existing wildlife haven.

The council have not demonstrated how wildlife will benefit from or be protected in the scheme.

3.Deliverability.

I am sceptical about the council's claim of deliverability on site MM411 (SES30) due to the natural problems present on this land.

The site has watercourses causing regular flooding. There is ancient woodland (Shirtcliff Wood).

There are kilometres of hedgerows, many veteran

trees, public footpaths, areas of coal mining risk, and the need for ecological buffers, reducing the area available for the stated number of homes. The Council estimates 150 homes a year to be built on the site, a figure far above normal rates for a site this size. I would therefore question the council's accuracy on what can actually be realized on this site, if they are to be respectful of its inherent constraints.

4. Invalid Reasons for Green Belt release.

The Green Belt is also being set aside for a school and a burial ground. At the previous hearings, the evidence showed the school may not be needed as the education department preferred to expand existing schools. So far there is no evidence to show the site is suitable for burials. If these uses are not needed, the land will probably be used for more housing, and could raise the total figure to 1000 houses. If the NPPF says Green Belt should only be released in exceptional circumstances, and those exceptional circumstances no longer pertain, then the greenbelt shouldn't be released.

5. MM411 (SES30) was actively farmed until this development was aired. Labour Prime Minister Keir Starmer has stated that no greenbelt farmland will be used for housing, so why is the council and government allowing this plan to go ahead?

I consider Main Modification MM411 (site SES30) to be unsound. It is not justified and not consistent with national policy. I request that SES30 be removed from the Plan and retained as Green Belt for the protection of the environment, biodiversity and the wellbeing of the local community.

Thank you,


Roger Hardwick



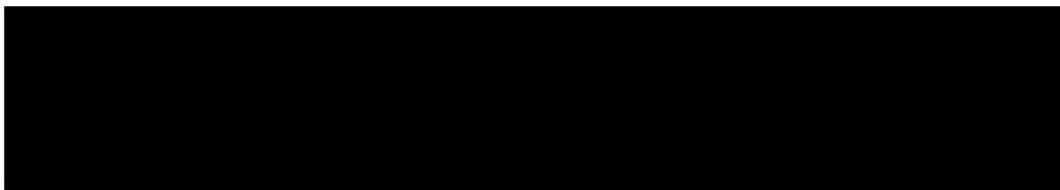
REF5.0128

Representation on Sheffield Plan Main Modifications — Site SES03 (Land east of Eckington Way, S20 1XE) — UNSOUND

From Nik Reeves-McLaren [REDACTED]
Date Tue 2026-04-28 6:43 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

 3 attachments (996 KB)

Re – Response - Environmental Information Regulations Request – Reference – EIR_ 2829665.eml; current sites.webp; archived sites.webp;



Dear Sheffield Plan Team,

Please find below my representation on the Sheffield Plan Main Modifications consultation, relating to site SES03 — Land to the east of Eckington Way, S20 1XE.

I consider the Plan as proposed to be modified is NOT sound. I wish to participate in hearing sessions.

Please acknowledge receipt of this representation.

REPRESENTATION TO THE SHEFFIELD PLAN MAIN MODIFICATIONS CONSULTATION



Site concerned: SES03 — Land to the east of Eckington Way, S20 1XE (Industrial and Travelling Showpeople Site, 6.85 hectares)

Relevant Plan policies/modifications: Policy SA5 (Southeast Sheffield Sub-Area Site Allocations); Southeast Sub-Area Policy; Annex A Site Allocations Schedule entry for SES03

Do you consider the Plan as proposed to be modified is sound? No

Do you consider the Plan as proposed to be modified is legally compliant? I have concerns regarding legal compliance, particularly regarding the adequacy of consultation, the Sustainability Appraisal, and the assessment of alternatives.

I wish to participate in the hearing sessions: Yes

GROUNDS OF OBJECTION

Introduction

I am a resident of Beighton and I live close to the land east of Eckington Way that is proposed for allocation as site SES03. I have been actively involved in the Save Springwell Field campaign since residents were first made aware of the proposals in early 2023, and I know this site intimately — I walk it regularly and have observed its wildlife at first hand across the seasons. I was part of the Springwell Residents' Panel that engaged with Clive Betts MP, instructed a King's Counsel to represent objectors at the October 2024 examination hearing, and participated in every stage of this process from the initial Regulation 19 consultation through to the present Main Modifications stage.

I am opposed to any development of the Eckington Way site, regardless of the nature of the proposed use. My objections are founded exclusively on planning grounds relating to highway capacity, air quality, public transport accessibility, ecological harm, landscape impact, agricultural land loss, and the adequacy of the evidence base. I wish to make absolutely clear that these objections apply equally to the industrial employment element and the travelling showpeople element of the allocation, and are not directed at any particular community. I fully recognise the council's legal obligation to provide sites for Gypsies, Travellers and Travelling Showpeople — my concern is that this particular site is fundamentally unsuitable for any form of intensive development, and that the evidence base underpinning the allocation is riddled with gaps, contradictions, and broken promises.

I submit that the allocation of site SES03 renders the Plan unsound, as it fails the tests set out at paragraph 35 of the National Planning Policy Framework. The allocation is not justified, not effective, and not consistent with national policy for the reasons set out below.

1. THE PLAN IS NOT JUSTIFIED: The highway network cannot accommodate this development

The council's own head of strategic transport, Tom Finnegan-Smith, told the October 2024 examination hearing that the junction of Eckington Way and Mosborough Parkway is one of 41 across the city requiring detailed investigation. The council's assessments projected road capacity reaching 101–102% by 2029, rising to 109–115% during evening peaks, and potentially escalating to 114–118% within a decade. Even the council described these as "worst-case" figures — but even the best-case projections show a road network at or exceeding capacity before any traffic from SES03 is added.

The objectors' barrister, Chris Young KC, told the hearing he had never in 25 years of practice heard of anyone promoting sites where traffic capacity figures of 109%, 114% or 118% were being discussed, describing those measurements as "completely unacceptable."

Critically, in response to a direct question from Inspector Katie Child, Mr Finnegan-Smith confirmed there are no plans to bring forward road improvement schemes on Eckington Way or in the local area. The Infrastructure Delivery Plan contains no funded mitigation for this junction.

As a resident, I can confirm the traffic situation is exactly as described. Eckington Way is routinely

gridlocked at peak times and weekends due to Crystal Peaks Shopping Centre (attracting 11 million visitors annually), Drakehouse Retail Park, and a proliferation of recent commercial development including Aldi, ASDA, Wetherspoons (1,200 capacity), Tesla, UPS distribution warehouse (24-hour operation), Costa Coffee, Tim Hortons, and Burger King. Residents of the Springwell estate already face significant delays simply leaving their homes. Council data records 13 collisions on Eckington Way and the roundabout in the five years preceding the examination, five of them classified as serious.

The council's own April 2025 Strategy & Resources Committee report on additional site allocations identified four junctions on the local road network requiring additional mitigation, one of which is the Junction of A57 Mosborough Parkway/Coisley Hill — in the immediate Eckington Way area. Yet this mitigation is being triggered by the new Green Belt sites, on top of a network the council's own evidence already showed was over capacity. SES03 itself — the original allocation that was the subject of the October 2024 hearing — still has no identified or funded mitigation whatsoever.

The council is simultaneously acknowledging that the Mosborough Parkway area needs junction mitigation (April 2025), adding further development pressure via new Green Belt allocations, but providing zero mitigation for SES03. This is a direct contradiction in the council's own evidence base.

Moreover, the council's evidence base treats Eckington Way (B6053) as a collector road feeding traffic to the A57 Mosborough Parkway. This fundamentally mischaracterises its function. In practice, Eckington Way operates as an arterial road in its own right, linking the A57 to Junction 31 of the M1 and serving as a primary route to Killamarsh, Barlborough, Eckington, and surrounding settlements in northeast Derbyshire. It carries strategic through-traffic from a wide catchment area in addition to the enormous volumes generated by Crystal Peaks, Drakehouse Retail Park, and the proliferation of commercial development along its length. Classifying this road as a collector and assessing its capacity on that basis understates the true scale of the traffic burden — and consequently understates the air quality impact of adding an industrial development at SES03.

The broken Transport Strategy promise. The council's officers told the Strategy & Resources Committee on 2 August 2023 that over-capacity junctions near SES03 would be reviewed as part of an "updated Transport Strategy for the city, which is expected to be produced by mid-2024." No such site-specific review has been delivered for Eckington Way. The Transport Vision published in March 2024 is a high-level city-wide aspirational document containing no junction-level mitigation for the Eckington Way area. This was a promise made to elected members and residents to justify proceeding with the allocation. It has not been honoured.

2. THE PLAN IS NOT JUSTIFIED: The public transport sustainability case has collapsed

The council's suitability assessment of site S03005 (the larger site encompassing SES03) scored it NN — the worst possible rating — for distance to the Core Public Transport Network, at more than 1,200 metres. The site was also assessed as being beyond 400m of any planned bus network improvement and beyond 800m of any planned tram or rail improvement.

A central plank of the justification for development at this location was the potential for new employment to support the business case for reopening the Barrow Hill Line to passengers, with a new railway station at Beighton. The Plan itself references this aspiration. However, the Infrastructure Delivery Plan Part 2 Addendum (Arup, May 2025) confirms that the Restoring Your Railways programme — which was to fund the Barrow Hill Line reopening — was cancelled by the

government in July 2024. While the Council and SYMCA state they continue to explore alternative funding, the Addendum acknowledges that the public transport policy position is "ever evolving" and no replacement funding source has been identified.

The cancellation of the Barrow Hill Line programme removes the principal public transport improvement relied upon to justify the sustainability credentials of this location. The Integrated Impact Assessment's conclusion that the location "provides opportunities for use of active and public transport modes ahead of the private car" and that employment growth could "support a business case for a new train station at Beighton" is now based on an infrastructure programme that no longer exists.

A plan allocation that relies on speculative transport infrastructure — which has been defunded — to justify a site scoring the worst possible rating for public transport accessibility cannot be considered "justified" under NPPF paragraph 35.

3. THE PLAN IS NOT JUSTIFIED: Air quality evidence demonstrates the area already exceeds legal limits — and the council removed its monitoring with no explanation

This is the single most damning failure in the evidence base underpinning SES03. The council's own published monitoring data shows that the diffusion tube site nearest to the proposed allocation exceeded the UK legal limit for NO₂ in every year it was monitored. The council then discontinued monitoring at that site, and in response to a formal request under the Environmental Information Regulations, has confirmed it holds no record of why.

The council's archived air quality monitoring data, accessible via the council's interactive map at sheffieldcc.maps.arcgis.com, records the following bias-adjusted annual mean NO₂ concentrations at the two discontinued diffusion tube sites nearest to SES03:

Moss Way/Donetsk Way (Drakehouse area, immediately adjacent to the proposed SES03 allocation):

- 2012: 46 µg/m³ — exceeds the 40 µg/m³ legal annual mean limit
- 2013: 47 µg/m³ — exceeds the 40 µg/m³ legal annual mean limit
- 2014: 46 µg/m³ — exceeds the 40 µg/m³ legal annual mean limit
- 2015: 48 µg/m³ — exceeds the 40 µg/m³ legal annual mean limit

Gypsy Queen/Sainsburys (Drakehouse Lane, Crystal Peaks):

- 2012: 29 µg/m³
- 2013: 30 µg/m³
- 2014: 29 µg/m³
- 2015: 27 µg/m³

The Moss Way/Donetsk Way site exceeded the UK legal annual mean NO₂ limit of 40 µg/m³ in every single year it was monitored. The trend was not improving — the final recorded reading of 48 µg/m³ was the highest of any year. Monitoring was then discontinued.

Following submission of a request under the Environmental Information Regulations on 26 March 2026, the council responded on 27 April 2026 (Ref: EIR/2829665) confirming that monitoring at these sites was discontinued in 2014/2015. When asked to provide any internal correspondence, reports, or decision records relating to the decision to discontinue monitoring, the council stated:

"We do not hold information about the decision making process as to why monitoring stopped in 2014."

The council has therefore formally confirmed that it removed the air quality monitoring sites closest to SES03 — and cannot produce a single document explaining why. There is no decision paper, no risk assessment, no internal correspondence, and no evaluation of whether continued monitoring was necessary. The monitoring was removed, at a site recording sustained illegal pollution levels, with no recorded justification whatsoever.

The timeline that emerges from the council's own data is as follows:

- 2012–2015: The diffusion tube at Moss Way/Donetsk Way records annual mean NO₂ concentrations of 46, 47, 46, and 48 µg/m³ — exceeding the 40 µg/m³ legal limit in every year of monitoring. The final reading is the highest. Monitoring is then discontinued with no recorded decision or justification.
- 2015–2023: The Eckington Way area undergoes explosive commercial development — ASDA, Aldi, Drakehouse Retail Park expansion, Tesla, UPS 24-hour distribution warehouse, Wetherspoons (1,200 capacity), Burger King, Costa Coffee, Tim Hortons, Papa's, Crystal Peaks East Mall extension, Ergo Park, Drake Business Park, and numerous other traffic-generating developments — all served by a road network that the council's own evidence shows is at or exceeding 100% capacity. At no point during this entire period of growth is air quality monitoring reinstated.
- December 2022: The council adopts SES03 for industrial and travelling showpeople use.
- August 2023: The Strategy & Resources Committee considers the allocation. Councillor Kurtis Crossland's formal objection (PDSP.157) states that the council's own site appraisal "highlights that the proposed site already is or is close to exceeding air quality levels." Multiple residents in the PDSP.207 collated objections independently corroborated that air quality in the Moss Way area was "already outside the ideal level" and that pollution from standing traffic was "visible and can be detected by taste."
- April 2026: The council's own interactive air quality map confirms that when only current active monitoring sites are displayed, the entire Eckington Way/Crystal Peaks/Drakehouse area contains no active diffusion tube monitoring whatsoever. The area is, as of 2026, an air quality monitoring black hole. Screenshots of the council's map showing the contrast between archived and current monitoring coverage are appended to this representation.
- April 2026: The council proceeds with the allocation while having no baseline air quality data for the Eckington Way area less than eleven years old, no explanation for why monitoring was removed, and no mechanism to detect or measure the cumulative impact of a generation of traffic-generating development.

In its EIR response, the council also denied that any officer made a statement about the site being "at or close to exceeding air quality levels" at the August 2023 committee, stating it had checked the webcast and could find no such statement. I note that Councillor Crossland attributed this characterisation to the council's own published site appraisal rather than to a verbal statement at the committee. The council's response does not address what its own site appraisal documents say about air quality at this location. If the council's position is now that air quality at SES03 is not a concern, that position must be reconciled with the documented sustained exceedance at the nearest monitoring site — data that the council itself collected and published.

The allocation conditions defer air quality assessment to the planning application stage. But how can a meaningful assessment be conducted when baseline monitoring from the nearest sites was discontinued over a decade ago with no recorded justification, the last data showed sustained and

worsening illegal pollution levels, and the intervening period has seen an unprecedented intensification of traffic-generating development? The council cannot credibly defer to a future assessment when it has systematically dismantled the evidence base that such an assessment would depend upon.

Furthermore, the Clean Air Zone introduced in February 2023 covers only the city centre inner ring road area and does not extend to Eckington Way. Vehicles travelling to and from the proposed SES03 site face no clean air restrictions whatsoever. The council cannot rely on the CAZ as mitigation for air quality impacts at this location.

The entire urban area of Sheffield was declared an Air Quality Management Area in March 2010 for NO₂ and PM₁₀ exceedances. The Eckington Way area falls within this AQMA. The council has a statutory duty under Part IV of the Environment Act 1995 to work towards achieving air quality objectives within the AQMA. Removing monitoring from an area with documented exceedances, permitting a decade of traffic-generating development without reinstating monitoring, and then proposing an industrial allocation in the same area is not consistent with that statutory duty.

4. THE PLAN IS NOT JUSTIFIED: Ecological harm, including confirmed presence of Red List species

The council's own suitability assessment scored the site N (negative) for ecology, concluding it is "likely to have a significant ecological value" and "requires further ecology assessment." The Integrated Impact Assessment identified boundary trees and hedges likely to be of ecological importance, and noted the site's proximity to Local Wildlife Sites and the Shire Brook Valley Nature Reserve. Multiple previous representations have identified the site as functioning as a wildlife corridor connecting Crystal Peak Meadows to Linley Bank to Beighton Orchard Local Wildlife Site.

I can provide first-hand evidence that significantly strengthens this ecological concern. I have personally observed skylarks (*Alauda arvensis*) nesting and foraging on the Eckington Way field. The skylark is:

- Classified as a Red List species under Birds of Conservation Concern 5 (2021)
- Protected under the Wildlife and Countryside Act 1981
- Designated as a Priority Species in the UK Biodiversity Action Plan
- A species that has suffered a catastrophic 62% decline in UK breeding population between 1970 and 2015

Skylarks are ground-nesting birds that require open grassland with short or tussocky vegetation — precisely the habitat provided by the Eckington Way field. Industrial development with its associated hard surfacing, buildings, noise, lighting, vehicle movements, and human activity is entirely incompatible with the continued presence of this species. The destruction of suitable habitat for a ground-nesting species already in severe national decline is not something that can be "mitigated" or "compensated" at the planning application stage — once the habitat is gone, it is gone.

The NPPF (paragraph 180) requires the planning system to minimise impacts on and provide net gains for biodiversity. Paragraph 186 states that if significant harm cannot be avoided, adequately mitigated, or compensated for, planning permission should be refused. Allocating a site known to support Red List species, without any prior ecological assessment, is inconsistent with this framework.

Yet the allocation has been confirmed with the further ecology assessment deferred to the planning application stage. If that assessment reveals — as the council's own scoring and the confirmed presence of protected species strongly suggest — that significant parts of the site are ecologically constrained, the effective developable area may be substantially reduced, undermining the viability of the allocation entirely.

5. THE PLAN IS NOT JUSTIFIED: Loss of confirmed Grade 2 agricultural land and the Green Belt question

The council's officers' report to the Strategy & Resources Committee (August 2023) confirmed that a strip of land along the western edge of SES03 is classified as Grade 2 — best and most versatile agricultural land. This is a higher classification than acknowledged in the Plan's site allocation conditions, which only require surveys to determine whether the land is Grade 3a. This is a direct inconsistency in the council's own evidence base: the officers know the site contains Grade 2 land, but the allocation conditions don't reflect this.

The NPPF and DEFRA's 25 Year Environment Plan both direct planning authorities to protect the best and most versatile agricultural land and to use areas of poorer quality land in preference. The Plan's own Policy GS4 seeks to safeguard such land. Allocating a site where Grade 2 land has been confirmed, without the allocation conditions properly acknowledging or protecting this, is inconsistent with national policy and the council's own Plan.

The land has been in regular agricultural use for crops including wheat, oilseed rape, and runner beans — the presence of oilseed rape being relevant as a defining crop for Grade 3a classification, which would elevate the wider site into the "best and most versatile" category.

Furthermore, the site's Green Belt function remains contested. The council's own Green Belt Review (Appendix 19) states that the SES03 land is "included within SE-4-b" — the adjacent Green Belt parcel. The site scores identically to SE-4-b in the Green Belt assessment matrix (2/1/5/5), including maximum scores of 5 for Purpose 3 (safeguarding countryside from encroachment — with over 80% covered by beneficial countryside uses) and Purpose 5 (assisting urban regeneration by encouraging recycling of derelict land). Even if the council maintains the site is not technically designated Green Belt, it functions as Green Belt in every meaningful respect, and its development would undermine the purposes that the adjacent Green Belt designation is intended to serve.

6. THE PLAN IS NOT EFFECTIVE: Physical constraints make the allocation undeliverable as proposed

The cumulative effect of physical constraints on SES03 means the site cannot deliver anything close to the 5.35 hectares of net employment floorspace the allocation assumes. These constraints include:

- High-voltage electricity pylons and cables running diagonally across the site. The council's own officers acknowledged that development under the power lines may be limited to access roads and car parking, and are awaiting confirmation from National Grid on whether any buildings would be permitted. This significantly reduces the developable area.

- A high-pressure gas pipeline running through the site, requiring permanent access corridors and restricting building and excavation work.
- The required environmental buffer strip between the existing housing and the developed part of the site.
- Ecological corridors and buffers required to maintain habitat connectivity and protect adjacent Local Wildlife Sites, which the allocation conditions specify must be maintained and removed from the developable area.
- The Grade 2 agricultural land strip along the western edge.

When these constraints are properly accounted for, the effective developable area shrinks dramatically. The council acknowledged at the examination hearing that "the capital costs are not fully known." This is not a sound basis for a plan allocation.

Additionally, the Becton Centre for Children and Young People — providing CAMHS, child and adolescent psychiatry, inpatient eating disorder facilities, and self-harm services — is located adjacent to the southern edge of the site, separated only by a footpath. Industrial development immediately adjacent to a mental health facility serving the city's most vulnerable young people raises serious amenity and incompatible use concerns that have never been properly assessed.

7. THE PLAN IS NOT CONSISTENT WITH NATIONAL POLICY: The assessment of alternatives is inadequate

The council's site selection process for the travelling showpeople element of SES03 considered only two sites in the entire city — Eckington Way and Hesley Wood — with Hesley Wood ruled out because it lay within the Green Belt. The Integrated Impact Assessment confirms no other reasonable alternatives were assessed.

In a city of 368 square kilometres, a search that identifies only two potential locations and eliminates one on a single criterion does not constitute the robust assessment of alternatives required by the NPPF and the SEA Regulations.

Since the original assessment, circumstances have materially changed. Hesley Wood (now designated CH04) has been brought forward as an additional Green Belt employment allocation in the Inspectors' January 2026 post-hearings letter. It is now formally proposed for release from the Green Belt for employment use. If Hesley Wood is being allocated for employment anyway — the very use category that applies to the majority of SES03 — could it not also accommodate the travelling showpeople use that is currently being forced onto the manifestly constrained Eckington Way site?

Furthermore, Clive Betts MP informed the residents' panel in March 2025 that a willing landowner in the north of the city has come forward offering to host a site of the type proposed at Eckington Way. This has been noted by the Inspectorate. Yet neither Hesley Wood nor this alternative has been assessed as an option for the travelling showpeople provision.

The travelling showpeople element requires only approximately 1.5 hectares. Coupling this modest requirement with a 5.35-hectare industrial allocation has the effect of tying the travelling showpeople provision to a site whose transport, air quality, and ecological constraints make it unsuitable for any intensive development. The council should be required to demonstrate that a genuinely comprehensive, city-wide site search has been undertaken.

The cross-boundary dimension has also been inadequately explored. Councillor Crossland's February 2023 objection noted that the Sheffield Gypsy and Traveller Accommodation Assessment acknowledged Doncaster has an oversupply of travelling showpeople provision, and that the required Statements of Common Ground between South Yorkshire authorities on GRT provision had not been produced before SES03 was proposed. This duty to cooperate concern has not been resolved.

8. THE PLAN IS NOT JUSTIFIED: The council's own committee decisions contradict this allocation

On Thursday 3 November 2022, the council's Transport, Regeneration and Climate Policy Committee resolved that:

"Releasing greenfield land in the Green Belt for development now has a high risk of undermining efforts to reuse the substantial supply of brownfield sites in the City Centre and other parts of the urban area. It would also cause significant harm to the city's biodiversity and would undermine the city's reputation as the 'Outdoor City'. The adverse impacts of meeting the full need therefore significantly and demonstrably outweigh the benefits of meeting the need for housing and other development when all factors are considered."

The council adopted SES03 — a greenfield site that its own Green Belt Review identifies as functionally equivalent to adjacent Green Belt land — just weeks after this committee resolution. The contradiction has never been explained.

9. CONSULTATION HAS BEEN INADEQUATE THROUGHOUT

The SES03 allocation attracted more public comments than any other element of the Plan, with over 4,000 people expressing opposition across multiple petitions. Despite this unprecedented level of objection, only minor cosmetic changes were made to the site conditions — the addition of an environmental noise buffer, overhead power line considerations, and removal of an agricultural land condition. Not one of the substantive concerns regarding traffic capacity, air quality, ecology, or suitability was addressed.

A member of the Springwell Residents' Panel, Fiona Duncan, spoke on behalf of residents at the Strategy & Resources Committee on 2 August 2023. Clive Betts MP subsequently praised her contribution, saying she "did a great job at the committee, both focusing in on the issues but also in a very clear way." Yet as another panel member, Steve English, documented at the time: her points were not addressed by either the Head of Planning nor any of the planning officers. It was, in his words, "a total whitewash."

Clive Betts MP told the October 2024 examination hearing that the council's consultation on Eckington Way was not meaningful — that the council believed the draft Plan could not be altered regardless of consultation responses because that would constitute a significant change requiring the process to start again. If the council had already decided the Plan could not be changed, the consultation was an empty exercise.

The collated objections submitted via the office of Clive Betts MP (PDSP.207) alone contained 32 individual households objecting to the allocation. This was in addition to the formal

representations submitted by the Springwell Residents' Panel (PDSP.385), individual residents including Steve English (PDSP.390), Tim Walker (PDSP.402), and "Springwelldweller" (PDSP.386), and the joint objection from all three Beighton ward councillors — Kurtis Crossland, Ann Woolhouse, and Bob McCann — together with neighbouring Mosborough ward councillors Gail Smith and Kevin Oxley (PDSP.157). The breadth and consistency of the objections — from individual pensioners to sitting councillors to the local Member of Parliament — is without precedent in the Sheffield Plan process.

10. THE INSPECTORS HAVE NOT YET PUBLISHED REASONING ON SES03

It is important to note that the Inspectors' Stage 3 & 4 post-hearings letter of 16 January 2026 (EXAM 213) does not specifically address SES03. The letter deals with additional Green Belt allocations, housing and employment supply figures, and other specific site matters — but contains no analysis of or conclusions about the Eckington Way allocation. The Inspectors state that "full reasoning and conclusions will be set out in the Inspectors final report."

Reports in the media and from some politicians that the Inspectors have "agreed" or "approved" the Eckington Way allocation are premature. The Inspectors have not rejected it, but they have equally not published any reasoned conclusions about it. The October 2025 update from Clive Betts MP noted that the council had not fully updated the Integrated Assessment Report in relation to SES03, relying on arguments that no longer apply given the acceptance of Green Belt release elsewhere. The MP made a further submission to the Inspectorate highlighting this deficiency, and the Inspectorate flagged it at hearings — which the MP interpreted as a positive sign for objectors.

This Main Modifications consultation remains a live opportunity to demonstrate that SES03 is unsound.

CONCLUSION AND REQUESTED CHANGES

The evidence assembled in this representation demonstrates that the allocation of site SES03 fails every test of soundness:

- **Not positively prepared:** The allocation does not address the transport infrastructure deficit, air quality concerns, or ecological constraints necessary to support the development it proposes.
- **Not justified:** The council's own evidence shows highway capacity already exceeding 100%, air quality monitoring at the nearest site exceeding the legal NO₂ limit in every year it was measured — with the monitoring then removed without explanation — the worst possible public transport accessibility score, confirmed Red List species on site, Grade 2 agricultural land, and an assessment of alternatives limited to just two sites in a city of 368 km².
- **Not effective:** Physical constraints (HV pylons, gas pipeline, buffer strips, ecological corridors, Grade 2 land) render the allocation undeliverable at the proposed scale, and no infrastructure mitigation is funded or planned.
- **Not consistent with national policy:** The allocation conflicts with NPPF provisions on biodiversity protection, agricultural land, air quality, sustainable transport, and the assessment of reasonable alternatives. It also contradicts the council's own November 2022 committee resolution on greenfield development. The council's statutory duty under Part IV

of the Environment Act 1995 to work towards achieving air quality objectives within the AQMA is not being met.

I request the following changes to make the Plan sound:

(a) The removal of site SES03 from Policy SA5 and from the Annex A Site Allocations Schedule.

(b) In the alternative, if the Inspectors are not minded to remove the allocation entirely:

- A requirement for the completion and publication of highways capacity mitigation for the Eckington Way/Mosborough Parkway junction, with identified funding, prior to the Plan's adoption;
- A requirement for reinstatement of air quality monitoring in South East Sheffield e.g. at the Moss Way/Donetsk Way and former Gypsy Queen/Sainsburys diffusion tube sites, and the establishment of a current baseline dataset demonstrating compliance with the NO2 annual mean objective, prior to adoption;
- A requirement for a comprehensive ecological assessment, including breeding bird surveys covering skylarks and other ground-nesting species, to be completed and published prior to adoption;
- Correction of the allocation conditions to acknowledge the confirmed presence of Grade 2 agricultural land on the western edge of the site;
- Reclassification of Eckington Way in the transport evidence base to reflect its actual function as an arterial route serving a wide catchment area.

(c) A requirement for a comprehensive, city-wide site search for travelling showpeople provision that considers a genuinely broad range of alternative locations — including Hesley Wood (CH04), the site offered by the willing landowner in the north of the city, and cross-boundary options — not limited to just two sites.

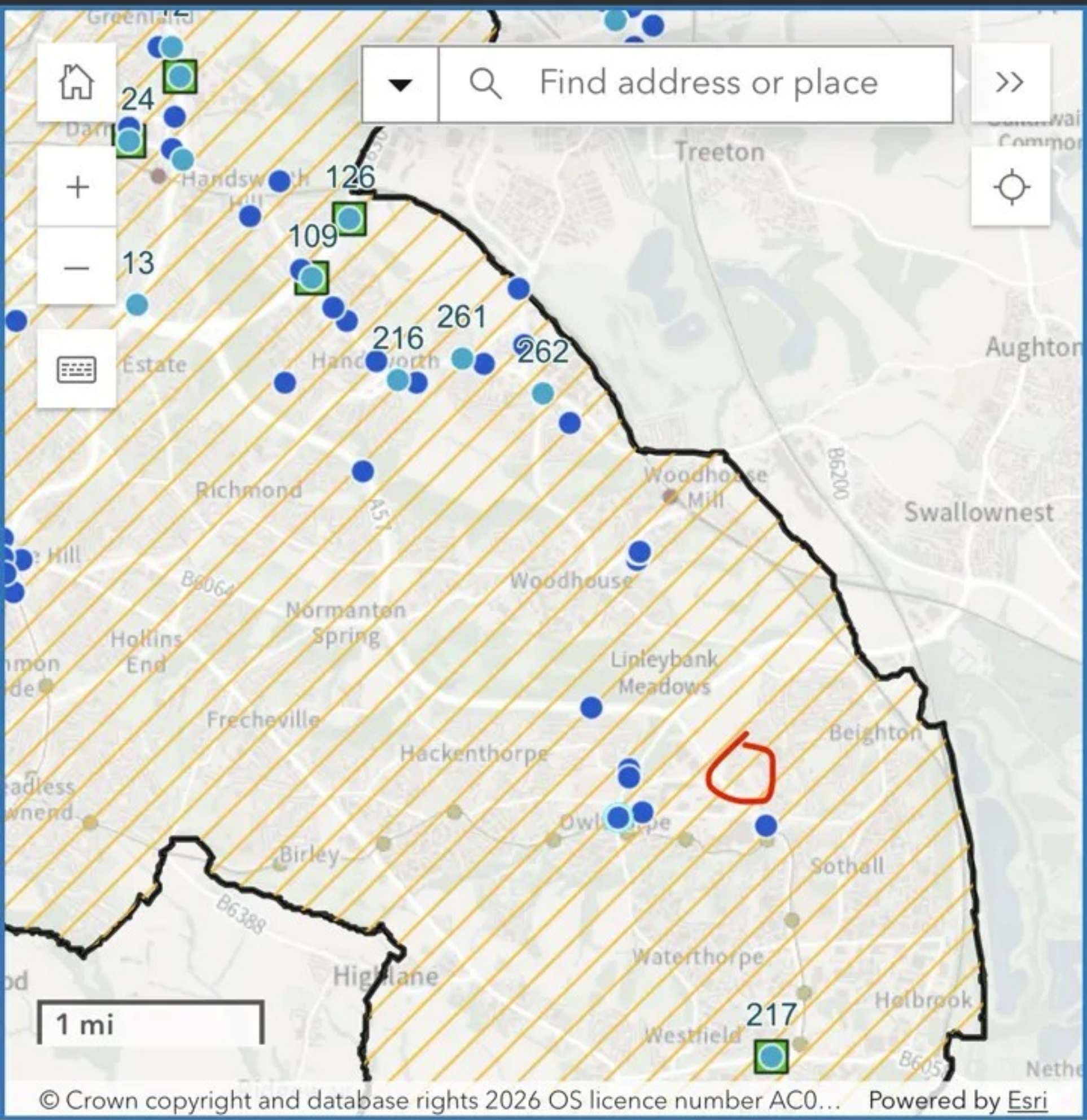
I wish to participate in any hearing session relating to this site allocation and the Southeast Sub-Area policies.

APPENDICES (to follow by separate email):

1. Screenshot of council interactive air quality map showing archived diffusion tube sites near SES03 (including Moss Way/Donetsk Way and Gypsy Queen sites)
2. Screenshot of council interactive air quality map showing current active monitoring sites — demonstrating complete monitoring void in the Eckington Way/Drakehouse/Crystal Peaks area
3. Council EIR response dated 27 April 2026 (Ref: EIR/2829665) confirming monitoring was discontinued and that the council holds no record of why

Yours faithfully,

Nik Reeves-McLaren
Beighton, Sheffield



Info

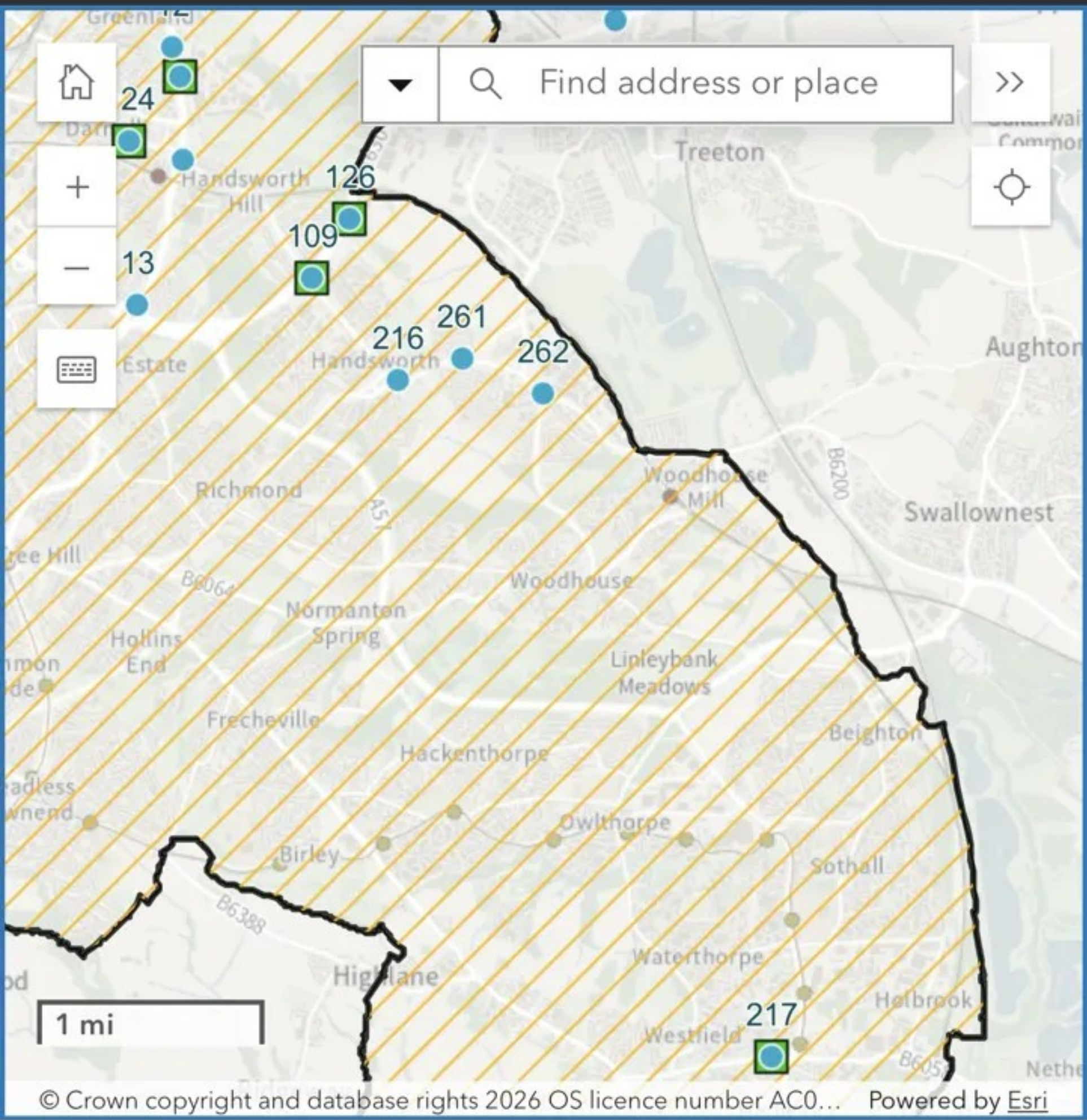


Tube Ownership	Community
Site Type	
Council Ward	
Road Name	
CAP Site Definition	

Last 5 years of readings

Annual Mean Concentration (µg/m³)





Layers

- ☰ Air Quality Real-Time Monitors
- ☰ Diffusion Tubes (Current)
- ☰ Diffusion Tubes (Archive) ✂
- ☰ Sheffield Clean Air Zone
- ☰ Air Quality Management Area

☰ ⓘ 📄

Re – Response - Environmental Information Regulations Request – Reference – EIR / 2829665

From FOI [REDACTED]

Date Mon 2026-04-27 10:47 PM

To Nik Reeves-McLaren [REDACTED]

Dear Nik Reeves-McLaren

Thank you for your request for information relating to air quality monitoring in S20 which we received on 26/03/2026.

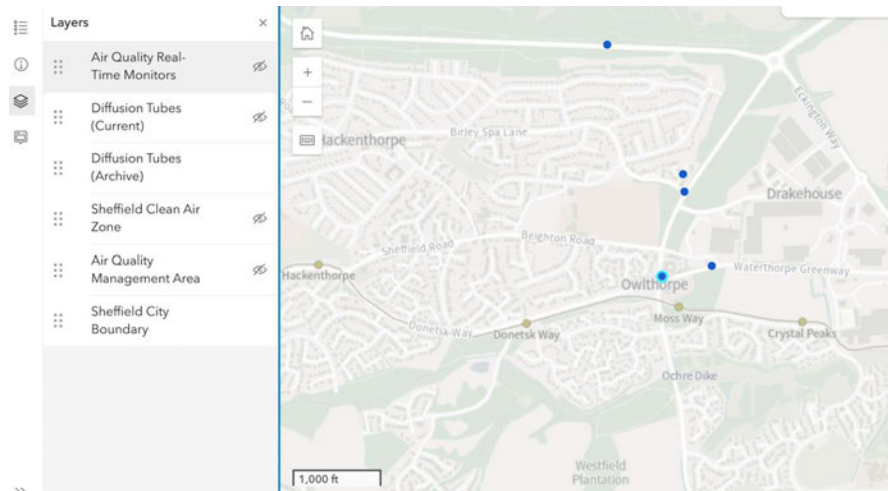
Please find Sheffield City Council's partial response to your request set out below:

Q1-3: Regulation 6(1)(b) of the Environmental Information Regulations 2004 allows a public authority to make environmental information available by reference where it is already publicly available and easily accessible, and where it is reasonable to do so. The information you have requested is already available on our website at the location set out below:

See our online map at [Air quality in Sheffield | Sheffield City Council](https://sheffieldcc.maps.arcgis.com/apps/instant/sidebar/index.html?appid=24dd93862d524ac1969a4366862fd099) under 'monitoring locations'

<https://sheffieldcc.maps.arcgis.com/apps/instant/sidebar/index.html?appid=24dd93862d524ac1969a4366862fd099> and 'supporting information' https://www.sheffield.gov.uk/sites/default/files/2025-12/air_quality_monitoring_results_2003_to_2024.xlsx.

Discontinued monitoring sites are referred to as 'Diffusion Tubes (Archive)' on the map and the layers can be turned on and off by clicking on the layer button in the top left of the screen and then turning the eye symbol on or off. See below screenshot of the map to show where the layers are.



Q4: We do not have hold information about the decision making process as to why monitoring stopped in 2014.

Q5: We have checked the webcast from the Strategy & Resources Policy Committee on 2 August 2023 and can find no statement from an officer saying that the Eckington Way site "already is or close to exceeding air quality levels".

Both the Head of Planning and the Strategic Planning Service Manager attended that meeting and wouldn't have been in a position to make a statement or answer a question on air quality; furthermore, the Air Quality officer was not present.

If you have any queries about this response, please do not hesitate to contact us.

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If you are unhappy with the response you have received in relation to your request, you are entitled to have this reviewed. You can ask for an internal review by replying to this email. Internal review requests should be submitted within 40 working days from the date of this response.

If you remain dissatisfied with the outcome of your internal review, you can contact the Information Commissioner's Office. Please see <https://ico.org.uk/make-a-complaint/official-information-concerns-report/official-information-concern> for further details.

Kind Regards,

Sheffield City Council
PO Box 1283
Sheffield, S1 1UJ
Email: FOI@sheffield.gov.uk

From: Nik Reeves-McLaren [REDACTED]
Sent: 26 March 2026 20:07
To: FOI <FOI@sheffield.gov.uk>
Subject: Freedom of Information Request — Air Quality Monitoring Data, Eckington Way / Crystal Peaks / Drakehouse Area

Dear Sir/Madam,

I am writing to make a request for information under the Freedom of Information Act 2000.

I am requesting the following information relating to air quality monitoring in the Eckington Way, Crystal Peaks, and Drakehouse area of Beighton, Sheffield (postcode area S20):

1. DISCONTINUED MONITORING SITES

I am aware that NO₂ diffusion tube monitoring sites were previously located at or near:

- (a) The Gypsy Queen public house, Drakehouse Lane, Crystal Peaks, Sheffield S20
- (b) Donetsk Way, Drakehouse, Sheffield S20

These sites no longer appear on the council's current interactive map of active diffusion tube monitoring sites.

For each of these sites, please provide:

- (i) The site reference number/identifier used in the council's monitoring network
- (ii) The date on which monitoring commenced at each site
- (iii) The date on which monitoring was discontinued at each site
- (iv) The reason(s) for discontinuing monitoring at each site
- (v) The complete set of annual mean NO₂ concentration data (bias-adjusted where available) recorded at each site for every year of operation
- (vi) The monthly NO₂ concentration data (bias-adjusted where available) for the final 12 months of operation at each site

2. ALL MONITORING DATA FOR THE S20 AREA

Please provide the complete set of annual mean NO₂ concentration data (bias-adjusted where available) for ALL diffusion tube monitoring sites that have operated within the S20 postcode area at any time between 2003 and 2024, including both active and discontinued sites. For each site, please identify whether it is currently active or discontinued.

3. CURRENT MONITORING PROVISION

Please confirm how many active NO₂ diffusion tube monitoring sites are currently located within the S20 postcode area, and provide their locations and most recent annual mean readings.

4. DECISION TO DISCONTINUE

Please provide any internal correspondence, reports, or decision records relating to the decision to discontinue the monitoring sites identified in section 1 above, including any assessment of whether continued monitoring at these locations was necessary to support the evidence base for the Sheffield Plan / Draft Local Plan.

5. CONTEXT

This request is made in the context of the proposed allocation of site SES03 (Land to the east of Eckington Way, S20 1XE) in the Sheffield Plan for industrial and travelling showpeople use. The council's own officers stated at the Strategy and Resources Committee meeting of 2 August 2023 that the site "already is or is close to exceeding air quality levels." I wish to understand the evidence base for this statement and why monitoring in the immediate vicinity has apparently been reduced.

I would prefer to receive the information electronically, by email to this address.

If you consider that any part of this request is unclear, or if the cost of compliance would exceed the appropriate limit, please contact me so that I can refine my request.

I look forward to receiving your response within the statutory 20 working day period.

Yours faithfully,

Nik Reeves-McLaren

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REF5.0129

Objection to the Proposed Main Modifications to the Sheffield Local Plan

From Penny Miller [REDACTED]
Date Tue 2026-04-28 6:53 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[REDACTED]

Dear Strategic Planning Team,

I am writing to object to the proposed Main Modifications to the Sheffield Local Plan, and particularly those that impact site SS19. While I recognise the need for a sound and deliverable plan, several of the modifications materially weaken safeguards that are essential for public safety, statutory compliance, and the fair distribution of development impacts across the city.

For these reasons, the proposed modifications fail to meet the tests of soundness set out in paragraph 36 of the National Planning Policy Framework (NPPF), specifically that the Plan must be justified, effective, and consistent with national policy.

I therefore set out below my objections to specific modifications.

MM7- This reframes the purpose of the Green Belt by highlighting only its role in supporting urban regeneration, while omitting the full set of Green Belt purposes set out in the NPPF. This narrow and reductive wording misrepresents national policy, weakens the strategic function of the Green Belt, and risks distorting future decision-making by implying that regeneration is its primary or sole purpose. Sheffield's Green Belt prevents sprawl and safeguards the countryside, yet MM7's selective emphasis creates an imbalanced narrative that could be used to justify further releases. The modification is therefore not justified, not effective, and should be amended to reflect the complete statutory purposes of the Green Belt.

Further to this, paragraph 5.9.8 of the Impact Assessment Report Addendum: Modifications Consultation (referred to in this document as IIA from this point, which can be found [here](#)) confirms that 'permanent negative effects would remain' on the environment and landscape character of SS19 as a result of its development. The assessment also confirms in paragraph 5.9.12 that the moderation of allocating green belt sites for development will have predominantly negative effects that will be difficult to fully mitigate.

MM10 MM11 MM90-MM93 - The Sheffield Local Plan relies on a significant windfall allowance of 7,475 homes out of a total supply of 39,159 homes (MM90), equating to approximately 19% of the overall housing supply.

This represents a substantial proportion of housing delivery being dependent on unallocated and uncertain sites, which by definition are not plan-led. The Plan does not provide sufficient evidence to demonstrate that this level of windfall delivery will be realised in a consistent, sustainable, or timely manner.

MM92 defines that the housing trajectory shows that the Sheffield Local Plan delivers only 298 dwellings above the identified requirement of 38,020 homes.

This represents a margin of less than 1% across the entire plan period, providing no meaningful flexibility to account for delays, non-delivery, viability issues, or infrastructure constraints. This is particularly concerning given the Plan provides only a very small margin above its housing requirement, meaning any shortfall in windfall delivery would result in the Plan failing to meet its targets.

MM18- With SS19 being one of the first green belt sites to be developed, and a year 7 place deficit until 2028/29, this does not provide the assurance that there will be adequate educational provision in the S12 area. Paragraph 3.2.3 of the Integrated Impact Assessment Report Addendum: Modifications Consultation (document here) states that, if a city centre school was built, it would be unlikely to be ready in time for the forecast peak deficit in places, weakening this mitigation further still. The moderation also fails to address how the educational needs of a post 16 student population, which continues to rise and will peak in 2028/29, will be met. This is a particular concern for S12 as the population will increase significantly with the planned development and south-east Sheffield has no post-16 provision.

There are also significant concerns about primary school provision across the S12 area, with Charnock Primary Academy (the primary school closest to SS19) already being oversubscribed by 33% (Sheffield City Council, 2025). The plan proposes the development of approximately 1,600 new homes in this part of the city (Draft Sheffield Local Plan Interactive Map and Sheffield Additional Site Allocations), growth that would ordinarily require a new primary school if delivered as a single strategic development. However the plan fails to demonstrate that essential education infrastructure can support the proposed level of growth.

MM19- The wording "include consideration" is non-binding and fails to secure delivery. The modification does not commit to a new facility, which is not allocated a site, and does not address the spatial mismatch between need and provision. S12, which lies outside the Central Sub-Area, is expected to absorb significant residential growth with just one extra consultation room being allocated to the area in the plan, despite having pockets of high deprivation and subsequent poor

health outcomes. MM19 does not demonstrate how healthcare needs arising from this growth will be met, and fails the NPPF tests of effectiveness and justification, and risks exacerbating health inequalities unless strengthened.

Concerns around the impact of development on health and wellbeing are supported by the revised IIA (which can be found here) which states that 'some new site allocations may reduce the overall amenity experienced by nearby residents. Although the Plan already includes measures to minimise these effects, it is unlikely that all remaining negative impacts can be fully avoided'. Paragraph 5.2.2 of this document also acknowledges that removal of greenbelt will have 'some negative effects in terms of mental health and wellbeing' on surrounding communities.

MM20 -The phrase "wherever practicable" is unacceptably ambiguous in a policy area that is critical to sustainable development and infrastructure delivery. It provides no commitment or assurance that transport improvements will be secured. The modification fails the NPPF tests of effectiveness and clarity, and risks undermining modal shift, accessibility, and safety objectives. It also weakens the plan's ability to secure equitable outcomes across sub-areas. The wording must be replaced with a firm commitment to secure transport improvements proportionate to development scale and impact, supported by planning obligations and the Infrastructure Delivery Plan.

This is particularly important for the S12 area, where transport is a significant concern in relation to the scale of development proposed. The Sheffield Local Plan identifies approximately 1,600 new homes across S12, which will inevitably generate a substantial increase in traffic movements and place additional pressure on an already constrained local road network. However, due to the dispersed spatial distribution of these allocations, there is currently no clear or coordinated transport strategy demonstrating how the cumulative impact of these developments will be mitigated.

The plan does not provide sufficient detail regarding required junction improvements, public transport capacity, pedestrian and cycling infrastructure, or wider highway mitigation measures necessary to support this level of growth. Without clear and deliverable transport commitments, there is a risk that the cumulative traffic impacts will significantly worsen congestion, reduce road safety, and undermine the sustainability of the area. Paragraph 5.6.5. If the IIA states that site SS19 'benefits from its proximity to the blue tram route and a high-frequency bus corridor', however, the lived experience of current residents is that this route is already under pressure during peak times and buses are infrequent and unreliable. As such, it is unclear how the proposed level of housing growth in S12 can be accommodated without substantial and clearly defined transport infrastructure improvements.

MM127 & MM128- The Plan suggests that Green Belt windfall sites could deliver up to 50% affordable housing, but there is no evidence this is achievable in practice. In fact, the Council's own evidence shows that sites like SS19 are only likely to deliver around 30% affordable housing. This creates a clear gap between what the policy promises and what can actually be delivered.

The Plan also relies on “windfall” sites to deliver higher levels of affordable housing. However, windfall sites are uncertain and cannot be guaranteed to come forward, or to deliver the infrastructure and affordable housing needed.

This means the Plan is relying on outcomes that may never happen, while still allowing development on Green Belt land.

The Council’s own housing needs evidence shows that the majority of housing need in Sheffield is for affordable housing. However, the Plan relies on sites such as SS19 that are only likely to deliver around 30% affordable housing, alongside uncertain windfall development. This fails to align with the identified need and undermines the justification for releasing Green Belt land. As a result, the approach is not justified, not reliable, and does not provide confidence that the promised affordable housing will be delivered.

MM224 MM 227- These modifications recognise that some sites have constraints (such as flood risk, access issues, and environmental limits), but there is no evidence of any level of recalculation to ascertain the reduction in buildable area and therefore reduction of the number of homes expected from those sites.

This raises concerns that the Plan is overestimating how many homes can actually be delivered. If parts of sites cannot be built on, the total housing numbers should be reduced accordingly.

In the case of sites such as SES13, the Plan acknowledges the need for buffers but does not reassess how this affects the number of homes the site can deliver.

More worryingly, SS19 is not included in these modifications even with significant constraints, including flood risk and the ecological corridor as well as additional buffers for the brook and hedgerows, this creates a risk that the Plan is relying on housing numbers that are not realistic, which undermines confidence that the overall housing target can be met & with such a low “buffer” of housing above the target, the plan could fail should the reality be reflected.

As a result, the Plan is not reliable, the modifications are not consistent across sites and does not provide a clear or accurate picture of what can actually be delivered.

MM429 (SS19) - The S12 Green Belt Action Group has submitted two previous consultation statements for MM429 (SS19) which highlight significant site constraints including flood risk and the ecological corridor, the need to protect the robin brook and its impact on the Moss Valley SSSI along with access constraints and hedgerow buffers but SS19 is not referenced in MM224 or MM227, which should require recalculation of housing impact across site allocations. This omission is concerning. If SS19’s constraints are serious enough to warrant modification text, they should

also trigger a reassessment of its contribution to housing supply. The failure to cross-reference SS19 in the impact recalculation undermines the credibility of the housing trajectory and suggests that constraint-driven reductions are not being applied consistently. This raises soundness concerns under NPPF paragraph 36(b) and (c): the plan may not be justified or effective if constrained sites are retained without transparent recalibration. The inconsistency also risks undermining spatial equity, as less constrained sites may be overburdened to compensate for undeliverable allocations like SS19.

It is also apparent that even with amended brook buffers and hedgerow buffers, the appropriate buffering has not been removed from the developable area, it is believed this will have an impact on the number of houses that are deliverable on the site and therefore impact the viability of the site.

The modifications also fail to consider the impact of North East Derbyshire District Council's Local Plan, particularly its proposed allocation immediately adjacent to SS19 (site reference 45900), which could deliver a further 348 homes alongside shops or a care facility. It is significant that the landowner, promoter and developer for site 45900 are the same as for SS19, yet NEDDC has assessed 45900 as unsuitable for development due to the same constraints repeatedly raised in relation to SS19.

The development of 45900 would create a single, continuous cross-boundary block of development that would clearly conflict with several of the Green Belt purposes set out in national policy: they would fail to check the unrestricted sprawl of the existing built-up area, erode the separation between Sheffield and North East Derbyshire, and constitute significant countryside encroachment. The two developments would effectively double the size of the Charnock estate with no planned proportionate infrastructure to support this rapid growth.

There appears to have been no meaningful collaboration with Sheffield City Council to assess the combined effects of these neighbouring proposals. The absence of any cross-boundary assessment represents a clear gap in the evidence base and undermines the justification for retaining SS19 in the plan.

This raises serious concerns regarding compliance with the Duty to Cooperate and further undermines the soundness of the Plan.

In conclusion, the main modifications do not adequately address the constraints and concerns highlighted in previous consultations, or during the public hearings. For the plan to be sound, it depends on modifications being made, however those proposed are vague and lack the detail to demonstrate that they are specific, credible, deliverable or proportionate to the scale of the development in the area. This fails to align with paragraph 42 of the NPPF which states that 'the more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits'.

I therefore urge the Inspectors to require further modifications, including the removal or reassessment of SS19, to ensure the Plan is sound.

I appreciate the opportunity to comment and urge the Inspectors and the Council to reconsider the Main Modifications to ensure the Local Plan remains robust, equitable, and fit for purpose.

Yours sincerely

Penny-Jane Miller

REF5.0130

Sheffield Local Plan Consultation - 5th May

From Mahmood Azam [REDACTED]
Date Tue 2026-04-28 10:11 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[REDACTED]

I wish to make the following consultation response in respect of the Sheffield Local Plan.

Approximately 58,000 Muslims reside in Sheffield, for whom burial is a non religious obligation along with many other faith groups. Whilst, I welcome the importance placed on delivering housing and employment sites to create a more prosperous Sheffield, it is immensely important that the allocation of sites and favourable development management policies are also embedded in the core of the Plan such that as the current cemetery provision comes to an end in the next 2-3 years, new cemeteries are created to meet the strategic need of citizens of Sheffield for the 21st Century.

I look forward to seeing favourable narrative in the adopted Local Plan in the near future, which responds positively to this community need as set out in the emerging Sheffield Cemetery Plan.

Regards

Mahmood

Sent from my iPhone

REF5.0131

Planning

From Paul [REDACTED]
Date Tue 2026-04-28 11:04 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[REDACTED]

We don't have a housing crisis we have planning crisis 1/ decisions taking to long 2/ CIL level ridiculous make developments not viable 3. Lack of communication from Sheffield council I could go on for ever but you probably wouldn't listen .
Sent from my iPhone

REF5.0132

Objection to the addition of the S13 Green Belt sites (SES29 and SES30) into the Plan.

From Adam Shephard [REDACTED]
Date Tue 2026-04-28 12:40 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Sir/Madam,

I am writing to formally object to the proposed release and development of Green Belt land in the S13 area of Sheffield as part of the Local Plan.

The current proposals would result in the loss of substantial areas of protected Green Belt, including sites such as Handsworth Hall Farm and land between Bramley Lane and Beaver Hill Road. These plans could see over 1,600 homes built across approximately 90 hectares of Green Belt land.

I strongly believe this development is unjustified and harmful for several reasons:

Firstly, Green Belt land exists to prevent urban sprawl, protect the character of communities, and safeguard natural environments. The S13 Green Belt provides vital habitats for wildlife, supports biodiversity, and acts as an important environmental buffer. Once lost, these open spaces cannot be replaced.

Secondly, these spaces are essential for the health and wellbeing of local residents. The campaign information highlights that these areas provide places for recreation, relaxation, and community connection, all of which would be permanently lost if development proceeds.

Thirdly, I am concerned that building on Green Belt is being prioritised over more sustainable alternatives such as brownfield development. Evidence suggests that releasing Green Belt land is a choice rather than a necessity, particularly in a city like Sheffield which is not densely built compared to others.

Finally, I would like to share a deeply personal reason for my objection. [REDACTED], access to these green spaces has been incredibly important for my mental health. Being able to walk, reflect, and spend time in nature has been a key part of coping with grief. Losing these areas would not only impact the environment but would also remove a vital source of emotional support for myself and many others in the community.

In conclusion, I respectfully urge the Inspectors to reject the proposed Green Belt allocations in S13. These plans would cause irreversible harm to the environment, the character of the area, and the wellbeing of residents, while more sustainable alternatives remain available.

Thank you for considering my objection.

Yours faithfully,

Adam Shephard,
[REDACTED]



Sent from [Outlook for iOS](#)

REF5.0133

SHEFFIELD LOCAL PLAN-OBJECTION TO MAIN MODIFICATION 227.

From Paulin Green [REDACTED]
Date Tue 2026-04-28 12:53 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[REDACTED]

We are writing to object to proposed Main Modification 227(MM227) in the Sheffield Local Plan. We object for the following reasons:-

It weakens the protections that the original Conditions on Development provided.

It makes the Conditions on Development optional rather than compulsory.

The word "Explore" and "Where feasible " are non binding and fail to secure delivery.

Therefore MM 227 would provide no commitment or assurance that the Condition on Development will be delivered.

The original Condition on Development was clear and specific MM227 makes the condition unacceptably ambiguous.

The wording regarding Biodiversity Net Gain is confusing and unclear. MM227 would dilute the requirements.

There are no longer requirements to provide buffers or to remove any part of the site from the developable area.

Environmental protections were considered to be necessary and so important that they were specified as a Condition on Development. However MM 227 would weaken that Condition on Development to such an extent that it would become invalid and pointless.

The reason for change is given "To ensure the Condition on Development is effective". We completely disagree as MM227 would make the condition much less effective.

For the reasons stated above we believe the Planning inspectors should remove Main Modification 227 and the original Condition on Development should remain as it is.

From
Pauline and Vincent Green,
[REDACTED]

SHEFFIELD LOCAL PLAN -Comment regarding Main Modifications 224 and 227.

From Paulin Green [REDACTED]
Date Tue 2026-04-28 1:06 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[REDACTED]

We are writing to comment on proposed Main Modifications 224 and 227(MM224 &MM227) in the Sheffield Local Plan.

This is for the following reason:-

These Main Modifications relate to flood risk and ecological provision.

However there is no evidence that the number of homes that a site can accommodate has been reduced due to these constraints.

From
Pauline and Vincent Green.

[REDACTED]

REF5.0134

Main Modifications Consultation

From Ian Pearson [REDACTED]
Date Tue 2026-04-28 1:04 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>
Cc [REDACTED]

External email

[REDACTED]

Ian Pearson

[REDACTED]

Good morning.

Please find below my comments regarding to the Main Modifications Consultation relating to S35.

Comments relate to Site: NES37

Land between Creswick and Yew Lane (Town End Farm)

MM 351

The Council's own lack of certainty and negativity.

- The Council's own comments included within the Integrated Impact Assessment states that the plan 'performs worse environmentally'.
- The Non Technical summary states that the Plan 'performs less well in relation to land, landscape, biodiversity and transport'.
- The Modified Plan relies on 'Green Belt release - which equates to permanent loss of greenfield land and reduced soil function'.
- 'Landscape and townscape effects become more negative'.
- 'Biodiversity outcomes are slightly worse'.
- 'Transport/accessibility also worsens because additional growth in more peripheral or car-dependant areas is likely to lead to worse vehicle movements and congested corridors'. This point is a major factor in the undeliverability of a final plan. It specifically sets out an immediate and primary factor : 2,000 extra vehicles per day would make local roads inaccessible, create traffic 'bottlenecks', add to air quality problems (a factor which has not been adequately explored at this point) and require massive infrastructure costs in relation to civil engineering and road widening plans.
- Further assessment is required in terms of spatial strategy changes, site allocations, Green Belt release, the unnecessary school/ burial ground land plan and, stronger Biodiversity and HRA measures. (There are sixteen schools within a two-mile radius).
- Habitat Regulation Assessments only reaches 'no adverse effect' conclusion because 'mitigation is assumed'
- A clear challenge to the Plan can be made in relation to 'Deliverability'. There are huge burdens upon air quality, land contours, heritage, ecology, highways and school proposals. For the Council to state that 'detail will be worked out later' is slipshod, hopeful and, amateurish in the extreme.

There is a clear thread of unsustainable positivity running throughout the Modification Plans: an approach that does not survive scrutiny as it exists upon wishful thinking and a desire to 'cover up' faults and hope for the best.

Echoes of the 'Street Trees Enquiry' persist.

- The 'Golden Rules' delivery plan for 50% affordable housing does not tally with developers forecasts of 30%. There is no clear outline on policies.
- Land availability plans are muddled, with areas removed for lack of availability information or non-delivery, whilst S35 is added even when it is unsure if availability is guaranteed.

The Modified Plans have done little to address the serious concerns and objections relating to the unsuitability of the proposed S35 developments.

The last call for Brownfield Sites was in 2019/20. As such sites are essential as prime motivators against Green Belt destruction, much more should be forthcoming from both Sheffield City Council and Government Inspectors.

It is obvious that any serious, valid and heartfelt objections made by local residents have been ignored or treated with what adds up to no more than contempt by the powers that be.

Prime Minister Starmer's statement that 'We will not be ploughing up farmland' - only for S35 to be faced with exactly that situation - sums up the duplicity perfectly.

Thank you

Mr Ian Pearson

Sent from my iPhone

REF5.0135

Re:

From Beshara Wad Ismail [REDACTED]
Date Thu 2026-04-30 5:49 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[REDACTED]

Thank you for the opportunity to take part in this consultation. I welcome the proposed changes and hope they will contribute to improving the quality of life in the city, while taking into account residents' needs and protecting the environment. I look forward to seeing positive outcomes that benefit everyone.

On Thu, 30 Apr 2026, 17:32 SheffieldPlan, <sheffieldplan@sheffield.gov.uk> wrote:

Hi,

Your comments appear to be missing from this email. Could you please resubmit them?

Thanks,

From: Beshara Wad Ismail [REDACTED]
Sent: 28 April 2026 10:17 AM
To: SheffieldPlan <sheffieldplan@sheffield.gov.uk>
Subject:

[REDACTED]

Thank you for the opportunity to share my views.
I would like to comment that [write your opinion].
I hope this will be taken into consideration.

Kind regards.

This Email, and any attachments, may contain non-public information and is intended solely for the individual(s) to whom it is addressed. It may contain sensitive or protectively marked material

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REF5.0136

For the attention of :-
Strategic Planning.
Howden House
Union Street
Sheffield.

SheffieldPlan@sheffield.gov.uk

Site references -

SES29 (MM410) Handsworth Hall Farm, Finchwell Road

SES30 (MM411) Bramley Lane /Beaver Hill Road

I wish to express my concerns over the review of the local plan and object to there being no major amendments to the proposed development of SES30 (Beaver/Bramley) or SES29,(Handsworth Hall Farm). I have particular concerns relating to the building of a multi faith burial ground on the SES30 site.

My main objection is about the placement of a multi faith burial ground on a proposed area of SES30, not only will it take away 4 hectares of our green belt and open spaces but feel our previous objections and concerns have been completely ignored.

Handsworth Cemetery is situated on Orgreave Lane which is adjacent to the SES29 site which is also allocated for future housing development. The boundary to the existing graveyard could be expanded onto SES29 using some of this allocated land. Making it easy to utilise and would be more acceptable.

Handsworth Cemetery has full access and a Chapel already on site. The area has funeral directors close by and nearby venues for receptions and wakes.

As the Handsworth Cemetery is owned by the Sheffield Council surely this would be a better and more cost effective plan instead of using green belt land.

With reference to SES29 which is only half a mile away from SES30, there have been plans to have a tram train on this site. Although there is agreement to this proposal there is no plan as to when this will happen. Promises have been given but a plan that relies on promises is not sound and should be removed.

Over the past few years there have been over 4000 houses built on the adjacent Waverley site with no plans for improvements to medical facilities etc. The area is vastly over subscribed already and plans to build even more houses in S13 and use green belt land makes this plan unsound and should be removed.

Why do you need to take green belt land when over 10,000 council houses have been demolished with only 300 built to replace them.

The vacant land should be used again as communities in these areas already have infrastructure and transport access.

Our green belt is important to us and yet you want to take it away for more pollution and congestion.

We want to leave our future generations with some freedom of space and give them mental wellbeing which we have no right to deprive them of. Once it's gone it's gone.

The plan as it stands is unsound so the site SES29 and SES30 should be removed from the plan and kept as Green Belt.

Barbara Parkin



REF5.0137

Sheffield Plan

From Alyson Fender [REDACTED]
Date Tue 2026-04-28 1:31 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Sir

I cannot wade through all of these amendments to find SES03 and want to know if modifications have been made to the traveller site proposal.

I continue to object due to the amount of traffic congestion in this area. It is a ridiculous site for the Travellers. Why can't it be near a less busy street!

Yours

Alyson Fender
[REDACTED]

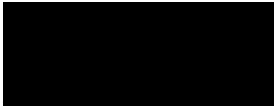
Sent from my iPhone

REF5.0138

MM411 (SES30)

From kathryn.currey@sheffield.gov.uk [REDACTED]
Date Tue 2026-04-28 1:40 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email



I am writing to respond to the Main Modifications Consultation pertaining, but not exclusive to, site SES30.

I consider the plan unsound and unjustified under the following points -

*The council suggests that the modified plan is worse for the environment - looking at the landscape, soil, biodiversity and transport implications.

The site at SES30 would be expected to be served by Beaver Hill Road a road that is already choc a block at times, this road from the council's own transport modelling is expected to be at full capacity by 2039 - with improvements. Without I suspect that it already is at times from what I observe every day.

Thereby I feel that safe/suitable access has not realistically been explored and demonstrated.

*At hearings it was suggested that the school planned may not actually be needed and that Sheffield City Council Education Department would prefer to extend the existing school in the area, which has plenty of land and space for expansion. As the NPPF says Green Belt should only be released in exceptional circumstances.

Thereby the plan shouldn't be removing Green Belt by the 'back door' by naming uses that may never happen.

*Reading reports and articles about the consultation, I notice that an ecological assessment was made by the Council suggesting that the site could be registered as a BNG habitat site and yet this was published months after the surveys should have been completed.

To conclude, I consider the Main Modification MM411 (SES30) to be unsound, unjustified and not consistent with national policy.

I request the site SES30 to be removed from the Plan and be retained as Green Belt land for local residents and future generations to enjoy and access as they do now.

I would like to be informed of the Inspectors' final report please.

Kathryn Currey

REF5.0139

Sheffield Local Plan Main Modifications Consultation (REF1.2011 - Representations submitted on behalf of Hallam Land)

From Amy James [REDACTED]
Date Tue 2026-04-28 1:59 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>
Cc [REDACTED]

 1 attachment (230 KB)

0602-04.RPT.M25 Sheffield Local Plan Main Mods Representations April 2026 (REF1.2011).pdf;

External email

Good afternoon

We write in relation to the Sheffield Local Plan Main Modifications consultation. Please find attached representations prepared by Tetlow King Planning and PPlanD on behalf of Hallam Land, in relation to Hallam Land's interests at Oakes Park, Norton Lane, Sheffield. These representations follow previous submissions made to earlier varying stages of the emerging Sheffield Local Plan (Response Reference: REF1.2011).

We trust that these representations will be taken into account.

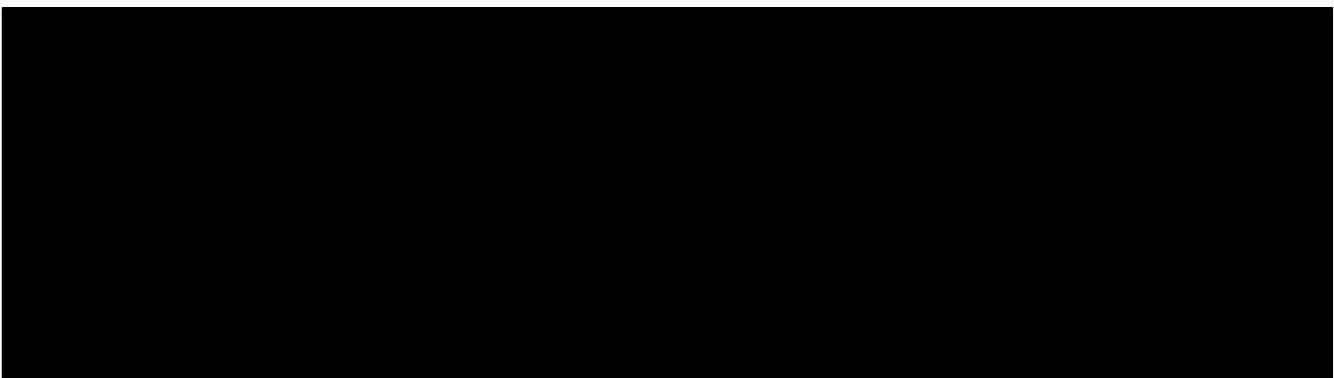
If you do require any further information, then please do not hesitate to get in touch.

Please can you confirm safe receipt.

Kind Regards

Amy

Amy James BA(Hons) MPlan MRTPI
Associate Director
Tetlow King Planning





Sheffield Council
Strategic Planning
Howden House
Union Street
Sheffield
S1 2SH

Date: 28 April 2026

Our Ref: AEJ/M25-0602-04

By email only: SheffieldPlan@sheffield.gov.uk

Dear Sir / Madam

RE: Sheffield Local Plan Examination – Main Modifications Consultation

Thank you for the opportunity to take part in the above consultation exercise. These representations have been prepared by Tetlow King Planning (“TKP”) and PLaND on behalf of our client Hallam Land, in relation to Hallam Land’s interests at Oakes Park, Norton Lane, Sheffield, and follows previous representations made to the varying versions of the emerging Sheffield Local Plan (Responses Reference: REF1.2011).

These representations relate to the Schedule of Main Modifications (March 2026) published by Sheffield City Council.

It is requested that these comments are taken into account as the Examination in Public and emerging Sheffield Local Plan progresses.

Main Modification Representations

Overall, there is objection to the proposed Main Modifications as they are based on an emerging Plan which is now fundamentally different to that which was submitted. The Plan as submitted sought to balance jobs and housing growth. Whereas the proposed Modifications are for a Plan which is still seeking to push economic growth but with a proposed stepped housing trajectory which will see less housing delivered for the majority of the Plan. Meaning the vision for job growth and housing provision no longer align (discussed further in response to specific proposed Main Modifications below).

In addition, when the emerging Plan was submitted, this was done in the context of it being a capacity-based Plan with only limited green belt sites being identified for release. At the Regulation 19 stage, the Council considered that green belt release was not necessary (beyond a specific brownfield regeneration opportunity at Norton), therefore, a dispersed approach to green belt release was not even considered as a ‘reasonable alternative’. Whereas now in order to address concerns raised by the Inspector as part of the Examination, a number of green belt sites are being released as additional housing sites are required.

As set out in previous representations, this substantial shift in approach to green belt should have resulted in a new full scale Green Belt Review being carried out, not the limited review (both in timescale and development) that was in fact carried out, resulting in the exercise being unsound.



There are additional green belt sites, such as land at Oakes Park (ref: S01220), that have not been subject to proper consideration by the Council and are suitable for release from the green belt and would make a meaningful contribution to delivering much needed housing. Previous representations, in particular those submitted in response to the Focused Period of Consultation Associated with Stage 4 Hearings in Nov/Dec 2025, explain why land at Oakes Park is suitable for development and can be brought forward sensitively with mitigation.

The following detailed objections are based on the Modified Plans compliance with the advice in NPPF dated September 2023 which was extant on the date of submission.

Objection to MM10 - Draft Policy SP1 Overall Growth Plan

Object to overall scale of housing provision in SP1) part a)

There is no clear explanation for the housing figure of 38,012 dwellings. This does not meet the area's objectively assessed needs (as required by NPPF para 35a), nor does it appear in the context of the NPPF (para 35 b) to be an appropriate strategy, taking into account the reasonable alternatives, and being based on proportionate evidence. There is no reference in the Plan to the alternatives considered or the evidence relied upon.

The Housing, Economic Growth and Demographic Modelling report July 2021 (paragraph 9.13 page 47) states that the modelling linked to the economic projections for the required labour supply increase result in a need for up to 2,323 dwellings per annum. However, this level of provision is not proposed until some five years after the adoption of the Plan (2031/32). People moving to the City for employment opportunities will also need a place to live, but the proposed stepped delivery of housing, will mean that many people will end up having to live outside of the City and commute in for work. This will increase the level of commuting to the City, and once these patterns are established it will be more difficult to secure a change on such patterns. This does not represent sustainable development or align with wider objectives (of both the Government and Sheffield City Council) to reduce carbon emissions as set out in the Local Plan as proposed to be modified (Forward page 4, Objectives page 21, Growth Plan paragraph 3.5).

The Council had stated (Local Plan paragraph 3.6) that the release of green belt sites has been limited because to do so would *"lead to higher carbon emissions due to the increased need to travel."* However, the commuting trips from outside the City, resulting from the mismatch between jobs growth and staged housing delivery, are likely to be longer than those from green belt sites. The strategy as proposed in the Main Modifications is, therefore, inconsistent and not based on appropriate evidence as there has been no assessment of the increased commuting in the accompanying SA.

Object to Plan period up to 2039 in SP1) part a)

The NPPF (paragraph 22) requires that strategic policies should look ahead over a minimum 15 year period from adoption. It further requires (paragraph 35) that in order for a Plan to be considered *"positively prepared"*, it must provide a strategy which, **as a minimum**, seeks to meet the area's objectively assessed needs.

Paragraph 68b) requires that specific, developable sites or broad locations for growth, should be identified for years 11-15 of the Plan where this is possible. The Council in its evidence for the submitted Plan and during the Examination never claimed that it is not possible to identify the land required to meet the Plan's requirement to 2041 (assuming the Plan is adopted in 2026).

This would require a further 4,752 homes to be identified for allocation (38,012/16*2).

Object to “stepped approach” in SP1) part a) and MM92 insertion of new “table 3”

Section 20(7C) of the Planning and Compulsory Purchase Act 2004 (as amended) requires the Inspector to recommend Main Modifications if asked to do so by the LPA, provided that the Main Modifications are necessary to make the Plan sound and legally compliant.

As highlighted by our submissions to the Hearings, the stepped approach as proposed in the Main Modification goes considerably beyond that which is required to make the Plan sound. In this respect the proposed Main Modifications are not in accordance with the Act. Whilst the PPG (Paragraph: 012 Reference ID: 68-021-20190722) suggests a stepped housing requirement may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies, however, in this case it is the Councils selection of sites that is causing the delay in delivery. This could be resolved by selecting additional sites as promoted through the Examination. There are clearly a range of small and medium scale sites that could have been released to assist in meeting the need within the five years, such as Oakes Park, Norton Lane.

In simple terms, the Plan would have a five year supply of housing on the date of adoption if the housing requirement up to the date of adoption is reduced to 1,780 dwellings per annum, then increased to the full requirement of 2,236 dwellings per annum in the five years after adoption, with finally just a small uplift to 2,465 dwellings per annum for the post 2031/32 period. This would generate a total of 38,020 dwellings over the Plan period. Such a change would be sound and lawful.

Table: Proposed stepped approach which meets the legal requirement as being necessary to ensure soundness

Actual Completions prior to adoption	Proposed Requirement	Trajectory Expected / Annual rate of delivery (MM Table 3 page 122)	Cumulative (year on Year) Rate of delivery
2022/23	1,780	1,628	1,628
2023/24	1,780	2,468	4,096
2024/25	1,780	1,119	5,215
Estimated completions prior to adoption			5,215
2025/26	1,780	1,421	6,636
5-Years from adoption			
2026/27	2,236	1,578	8,214
2027/28	2,236	3,391	11,605
2028/29	2,236	1,497	13,102
2029/30	2,236	2,841	15,943
2030/31	2,236	3,157	19,100
Years 6-10 after Adoption			
2031/32	2,465	2,914	22,014
2032/33	2,465	2,332	24,346
2033/34	2,465	2,566	26,912
2034/35	2,465	2,381	29,293
2035/36	2,465	2,777	32,070
Years 11-13 after Adoption			
2036/37	2,465	2,374	34,444
2037/38	2,465	2,197	36,641
2038/39	2,465	1,783	38,424
TOTAL	38,020	38,424	

Table: 5 year housing land supply as calculated in accordance with the above stepped trajectory

	Dwellings
5- year requirement from 2022 (2,236 x 5)	11,180
Completions 2022/23-2025/26	6,636
Reduced requirement pre adoption 1,780 per year (2022/23 to 2025/26)	7,120
Shortfall 2022/23-2025/26	484
5- year requirement (including shortfall)	11,664
5% Buffer	583.2
Total net 5-year requirement	12,247
Total net 5-year Supply (2026/27 - 20230/31) 12,498	12,464
Number of Years Supply	5.1

However, at present, the evidence demonstrates that the proposed reduction of the housing requirement in the first five years after adoption is unlawful as it is clearly and demonstrably not necessary to make the Plan sound.

Furthermore, adopting a Plan that only seeks to meet its housing requirement for less than half of the Plan period (eight years out of a total of 17 years) cannot be described as being positively prepared (NPPF Para 36 a) especially as the evidence available demonstrates that additional sites could be allocated.

In addition, the Plan, as proposed to be modified also fails to be effective (NPPF para 36 c). The proposed Modifications setting out the stepped approach requires a significant uplift five years after adoption in the rate of delivery from 1,780 dpa to 2,750 dpa an increase of some 54%. However, at this point, as the Plan is five years old the housing requirement will be replaced by the standard method calculation (as required by para 78 of the NPPF). The Plan therefore has no mechanism for ensuring the delivery of the additional dwellings that the Council's evidence suggests is required to support the economic growth of the city.

Lastly the approach in the amended policy and as set out in the new table 3 is not justified (NPPF Para 35 b) as it fails to represent an appropriate strategy, taking into account the reasonable alternatives, and being based on proportionate evidence. There are as demonstrated above, reasonable alternatives to this approach which would be lawful and the proportionate evidence presented at the Hearings highlighted a number of additional sites that could have been incorporated into the Plan, including Oakes Park, Norton Lane, to address the issue of projected undersupply.

Object to MM MM90 and MM91 – Draft Policy H1 Scale and Supply of New Housing

See objection to MM10 Policy SP1 above regarding the overall level of housing in this draft policy.

Mr Bolton's (PLanD) submission on Matter 4 (DLP ref: 04.26.24.Sheffield Local Plan MIQ - Matter 4 Final) highlighted in Table 1 (page 13) that the then proposed distribution of new dwellings was unequitable and would not meet the needs of those requiring affordable housing within the City. The additional allocations now proposed as Main Modifications do not address this issue.

The proposed Main Modifications do not address the mismatch of demand and supply highlighted in Mr. Boltons earlier submission. Despite the allocation of additional sites which will lead to an increase in the number of houses that will be delivered in the Plan period, the Plan remains focused on delivering one and two bedroomed apartments for rent in or close to the City Center. This is contrary to the pattern of demand as evidenced by the Council in the SHMA 2019 Table 8.1 (CD9.05) which suggests that the majority of households (80%) are wishing to access houses rather than apartments (20%) as shown in the table 4 of appendix 1 (DLP ref: 04.26.24.Sheffield Local Plan MIQ - Matter 4 Final Appendix 1).

The Plan, even as amended, should not be regarded as sound as it is clearly not an appropriate strategy when considered against the proportionate evidence base including the Council's own SHMA.

Furthermore, as set out in Mr Bolton's response to SP2 (DLP ref: 04.22.24 Sheffield Local Plan MIQ - Matter 8) and in his earlier submissions to this Examination most allocated sites are unviable with 0% affordable as illustrated by Table 2 in the DLP objection to SP2 (replicated in appendix 1) and Table 10.9 (page 172) of the Whole Plan Viability Assessment (September 2022) (VI01). The issue of the lack of viability of City Centre sites remains unresolved with the Council's verbal evidence suggesting that these allocations are made with the assumption that they will attract government funding and as such might deliver 10% affordable housing. Even if the allocations in the central area manage to deliver 10% affordable housing with grant aid this (1,800 units) would still be significantly short of the identified affordable housing requirement for the area of 6,544 units.

This continued reliance on unviable sites to deliver unwanted dwelling types in unpopular locations strongly suggests that the Plan will fail to deliver the required level of housing and is clearly unsound.

MM98 - Draft Policy T1 Enabling Sustainable Travel

The suggested amendment makes it clear that the Council is keen to prioritise initiatives and schemes that "*enable sustainable travel*". However, as set out above, the fact the Council is suggesting a stepped trajectory for housing delivery but pushing for economic growth and greater employment opportunities with Sheffield means that there will inevitably be increased inward commuting, which is at odds with the objectives of MM98.

The desire the Council has to ensure schemes enable sustainable travel will not be met unless more dwellings are delivered in the early years of the plan so that current and future housing needs can be met, without the need for those working within Sheffield being forced to live outside the Authorities' boundaries due to an insufficient supply of housing.

MM8 / Paragraph 3.11

MM8 inserts a requirement for an early review of the Sheffield Plan to focus on the need for large-scale logistics land and enable opportunities for carrying out further assessment of the supply and requirements for large-scale logistics over a wider area in the sub-region.

However, there is still no review mechanism incorporated into the emerging Plan which requires a review earlier than the statutory five-year requirement. The absence of a policy mechanism which requires early review of the Plan, i.e. within five years of adoption, doesn't align with MM8 which sets out the Council's acknowledgement that an early review of the Plan is needed.

If the Council is serious about carrying out an early review, then as suggested in previous representations submitted by TKP and PPlanD on behalf of Hallam Land, a policy, making it clear that the Plan will be subject to an early review will assist the Council in reinforcing the commitment it is making in MM8.

The need for an early review of the Plan has already been explained in detail in previous representations, but in summary, this is considered vital on the grounds that the deficiencies of the Plan (see previous representations) are so great that should it be found sound it will require immediate review. For completeness, the suitable policy suggested previously is re-iterated below:

“Policy 1 – Reviewing the Sheffield Local Plan

The Council will undertake a review of the Local Plan, which will commence no later than one year after the adoption of the Plan. An updated, or replacement Plan will be submitted for Examination no later than three years after the date of adoption of the Plan. In the event that this submission date is not adhered to, the policies in the Local Plan which are most important for determining planning applications for new dwellings will be deemed to be ‘out of date’ in accordance with paragraph 11d) of the National Planning Policy Framework 2024 (or as amended).

The Plan review will secure levels of growth that accord with Government policy. The planning and delivery of strategic growth will include a comprehensive review of Sheffield’s Green Belt Boundaries.

The review will also serve to build stronger working relationships with adjoining and nearby Authorities any may result in the preparation of a Joint Strategic Plan based on a wider geography”.

MM103 – Draft Policy BG1 – Blue and Green Infrastructure and the Local Nature Recovery Network (Page 135, paragraph 5.25)

It is noted at paragraph 5.25 that work on the South Yorkshire LNRS has not yet been completed and that it is suggested that once the work is complete further details will be set out in a Supplementary Planning Document (SPD). However, SPDs are not subject to the same level of scrutiny as a Local Plan, therefore, by delaying the considerations of the work on the LNRS until after the adoption of the Local Plan means it will be less rigorously reviewed.

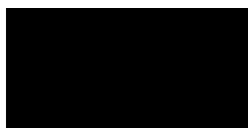
This approach is inappropriate particularly given that the LNRS will map the network of designated wildlife sites and identified greenspaces, countryside and previously developed sites that will provide opportunities for nature recovery. This process should be subject to thorough assessment.

The fact that work is still outstanding on key matters such as LNRSs is another example as to why there is a need for a policy to be included within the emerging Plan committing to an immediate review, as this would allow the findings from the LNRSs work to be considered and incorporated as part of that review.

It is requested that these representations are taken into account as the emerging Sheffield Local Plan progresses.

If there are any queries, please do not hesitate to get in touch.

Yours sincerely



Amy James BA(Hons) MPlan MRTPI
ASSOCIATE DIRECTOR
For and On Behalf Of
TETLOW KING PLANNING



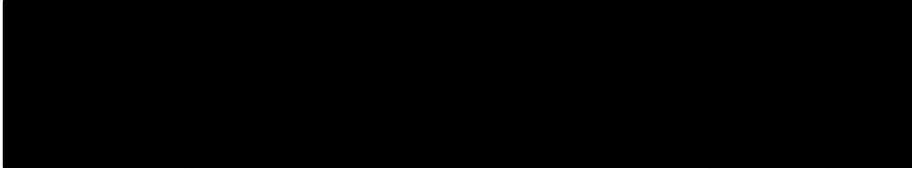
REF5.0140

Plans for Dore s17

From .Aol. 

Date Tue 2026-04-28 2:59 PM

To SheffieldPlan <sheffieldplan@sheffield.gov.uk>



Sadly it is impossible to get a doctors appointment

Sadly the dentist has a very long waiting list for new customers

Sadly in the village it is almost impossible to find a parking space

It's not a very welcoming situation for new residents

One of the fields by limb lane has an old lead mine and also an old coal mine. I hope you've taken all these points into consideration when planning a new build

Yours faithfully

Christina A Stark

Dore resident

[Sent from the all new AOL app for iOS](#)

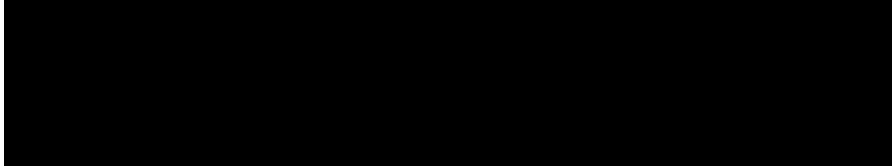
REF5.0141

Objection to the Proposed Main Modifications to the Sheffield Local Plan - site SS19

From Gill Hill 

Date Tue 2026-04-28 3:03 PM

To SheffieldPlan <sheffieldplan@sheffield.gov.uk>



Dear Strategic Planning Team,

I am writing to object to the proposed Main Modifications to the Sheffield Local Plan, and particularly those that impact site SS19. While I recognise the need for a sound and deliverable plan, several of the modifications materially weaken safeguards that are essential for public safety, statutory compliance, and the fair distribution of development impacts across the city.

For these reasons, the proposed modifications fail to meet the tests of soundness set out in paragraph 36 of the National Planning Policy Framework (NPPF), specifically that the Plan must be justified, effective, and consistent with national policy.

I therefore set out below my objections to specific modifications.

MM7- This reframes the purpose of the Green Belt by highlighting only its role in supporting urban regeneration, while omitting the full set of Green Belt purposes set out in the NPPF. This narrow and reductive wording misrepresents national policy, weakens the strategic function of the Green Belt, and risks distorting future decision-making by implying that regeneration is its primary or sole purpose. Sheffield's Green Belt prevents sprawl and safeguards the countryside, yet MM7's selective emphasis creates an imbalanced narrative that could be used to justify further releases. The modification is therefore not justified, not effective, and should be amended to reflect the complete statutory purposes of the Green Belt.

Further to this, paragraph 5.9.8 of the Impact Assessment Report Addendum: Modifications Consultation (referred to in this document as IIA from this point, which can be found [here](#)) confirms that 'permanent negative effects would remain' on the environment and landscape character of SS19 as a result of its development. The assessment also confirms in paragraph 5.9.12 that the moderation of allocating green belt sites for development will have predominantly negative effects that will be difficult to fully mitigate.

MM10 MM11 MM90-MM93 - The Sheffield Local Plan relies on a significant windfall allowance of 7,475 homes out of a total supply of 39,159 homes (MM90), equating to approximately 19% of the overall housing supply.

This represents a substantial proportion of housing delivery being dependent on unallocated and uncertain sites, which by definition are not plan-led. The Plan does not provide sufficient evidence to demonstrate that this level of windfall delivery will be

realised in a consistent, sustainable, or timely manner.

MM92 defines that the housing trajectory shows that the Sheffield Local Plan delivers only 298 dwellings above the identified requirement of 38,020 homes.

This represents a margin of less than 1% across the entire plan period, providing no meaningful flexibility to account for delays, non-delivery, viability issues, or infrastructure constraints. This is particularly concerning given the Plan provides only a very small margin above its housing requirement, meaning any shortfall in windfall delivery would result in the Plan failing to meet its targets.

MM18- With SS19 being one of the first green belt sites to be developed, and a year 7 place deficit until 2028/29, this does not provide the assurance that there will be adequate educational provision in the S12 area. Paragraph 3.2.3 of the Integrated Impact Assessment Report Addendum: Modifications Consultation (document here) states that, if a city centre school was built, it would be unlikely to be ready in time for the forecast peak deficit in places, weakening this mitigation further still. The moderation also fails to address how the educational needs of a post 16 student population, which continues to rise and will peak in 2028/29, will be met. This is a particular concern for S12 as the population will increase significantly with the planned development and south-east Sheffield has no post-16 provision.

There are also significant concerns about primary school provision across the S12 area, with Charnock Primary Academy (the primary school closest to SS19) already being oversubscribed by 33% (Sheffield City Council, 2025). The plan proposes the development of approximately 1,600 new homes in this part of the city (Draft Sheffield Local Plan Interactive Map and Sheffield Additional Site Allocations), growth that would ordinarily require a new primary school if delivered as a single strategic development. However the plan fails to demonstrate that essential education infrastructure can support the proposed level of growth.

MM19- The wording “include consideration” is non-binding and fails to secure delivery. The modification does not commit to a new facility, which is not allocated a site, and does not address the spatial mismatch between need and provision. S12, which lies outside the Central Sub-Area, is expected to absorb significant residential growth with just one extra consultation room being allocated to the area in the plan, despite having pockets of high deprivation and subsequent poor health outcomes. MM19 does not demonstrate how healthcare needs arising from this growth will be met, and fails the NPPF tests of effectiveness and justification, and risks exacerbating health inequalities unless strengthened.

Concerns around the impact of development on health and wellbeing are supported by the revised IIA (which can be found here) which states that ‘some new site allocations may reduce the overall amenity experienced by nearby residents. Although the Plan already includes measures to minimise these effects, it is unlikely that all remaining negative impacts can be fully avoided’. Paragraph 5.2.2 of this document also acknowledges that removal of greenbelt will have ‘some negative effects in terms of mental health and wellbeing’ on surrounding communities.

MM20 -The phrase “wherever practicable” is unacceptably ambiguous in a policy area that is critical to sustainable development and infrastructure delivery. It provides no commitment or assurance that transport improvements will be secured. The modification fails the NPPF tests of effectiveness and clarity, and risks undermining modal shift, accessibility, and safety objectives. It also weakens the plan’s ability to secure equitable outcomes across sub-areas. The wording must be replaced with a firm

commitment to secure transport improvements proportionate to development scale and impact, supported by planning obligations and the Infrastructure Delivery Plan.

This is particularly important for the S12 area, where transport is a significant concern in relation to the scale of development proposed. The Sheffield Local Plan identifies approximately 1,600 new homes across S12, which will inevitably generate a substantial increase in traffic movements and place additional pressure on an already constrained local road network. However, due to the dispersed spatial distribution of these allocations, there is currently no clear or coordinated transport strategy demonstrating how the cumulative impact of these developments will be mitigated.

The plan does not provide sufficient detail regarding required junction improvements, public transport capacity, pedestrian and cycling infrastructure, or wider highway mitigation measures necessary to support this level of growth. Without clear and deliverable transport commitments, there is a risk that the cumulative traffic impacts will significantly worsen congestion, reduce road safety, and undermine the sustainability of the area. Paragraph 5.6.5. If the IIA states that site SS19 'benefits from its proximity to the blue tram route and a high-frequency bus corridor', however, the lived experience of current residents is that this route is already under pressure during peak times and buses are infrequent and unreliable. As such, it is unclear how the proposed level of housing growth in S12 can be accommodated without substantial and clearly defined transport infrastructure improvements.

MM127 & MM128- The Plan suggests that Green Belt windfall sites could deliver up to 50% affordable housing, but there is no evidence this is achievable in practice. In fact, the Council's own evidence shows that sites like SS19 are only likely to deliver around 30% affordable housing. This creates a clear gap between what the policy promises and what can actually be delivered.

The Plan also relies on "windfall" sites to deliver higher levels of affordable housing. However, windfall sites are uncertain and cannot be guaranteed to come forward, or to deliver the infrastructure and affordable housing needed.

This means the Plan is relying on outcomes that may never happen, while still allowing development on Green Belt land.

The Council's own housing needs evidence shows that the majority of housing need in Sheffield is for affordable housing. However, the Plan relies on sites such as SS19 that are only likely to deliver around 30% affordable housing, alongside uncertain windfall development. This fails to align with the identified need and undermines the justification for releasing Green Belt land. As a result, the approach is not justified, not reliable, and does not provide confidence that the promised affordable housing will be delivered.

MM224 MM 227- These modifications recognise that some sites have constraints (such as flood risk, access issues, and environmental limits), but there is no evidence of any level of recalculation to ascertain the reduction in buildable area and therefore reduction of the number of homes expected from those sites.

This raises concerns that the Plan is overestimating how many homes can actually be delivered. If parts of sites cannot be built on, the total housing numbers should be reduced accordingly.

In the case of sites such as SES13, the Plan acknowledges the need for buffers but does not reassess how this affects the number of homes the site can deliver.

More worryingly, SS19 is not included in these modifications even with significant constraints, including flood risk and the ecological corridor as well as additional buffers for the brook and hedgerows, this creates a risk that the Plan is relying on housing numbers that are not realistic, which undermines confidence that the overall housing target can be met & with such a low “buffer” of housing above the target, the plan could fail should the reality be reflected.

As a result, the Plan is not reliable, the modifications are not consistent across sites and does not provide a clear or accurate picture of what can actually be delivered.

MM429 (SS19) - The S12 Green Belt Action Group has submitted two previous consultation statements for MM429 (SS19) which highlight significant site constraints including flood risk and the ecological corridor, the need to protect the robin brook and its impact on the Moss Valley SSSI along with access constraints and hedgerow buffers but SS19 is not referenced in MM224 or MM227, which should require recalculation of housing impact across site allocations. This omission is concerning. If SS19’s constraints are serious enough to warrant modification text, they should also trigger a reassessment of its contribution to housing supply. The failure to cross-reference SS19 in the impact recalculation undermines the credibility of the housing trajectory and suggests that constraint-driven reductions are not being applied consistently. This raises soundness concerns under NPPF paragraph 36(b) and (c): the plan may not be justified or effective if constrained sites are retained without transparent recalibration. The inconsistency also risks undermining spatial equity, as less constrained sites may be overburdened to compensate for undeliverable allocations like SS19.

It is also apparent that even with amended brook buffers and hedgerow buffers, the appropriate buffering has not been removed from the developable area, it is believed this will have an impact on the number of houses that are deliverable on the site and therefore impact the viability of the site.

The modifications also fail to consider the impact of North East Derbyshire District Council’s Local Plan, particularly its proposed allocation immediately adjacent to SS19 (site reference 45900), which could deliver a further 348 homes alongside shops or a care facility. It is significant that the landowner, promoter and developer for site 45900 are the same as for SS19, yet NEDDC has assessed 45900 as unsuitable for development due to the same constraints repeatedly raised in relation to SS19.

The development of 45900 would create a single, continuous cross-boundary block of development that would clearly conflict with several of the Green Belt purposes set out in national policy: they would **fail to check the unrestricted sprawl** of the existing built-up area, **erode the separation between Sheffield and North East Derbyshire**, and **constitute significant countryside encroachment**. The two developments would effectively double the size of the Charnock estate with no planned proportionate infrastructure to support this rapid growth.

There appears to have been no meaningful collaboration with Sheffield City Council to assess the combined effects of these neighbouring proposals. The absence of any cross-boundary assessment represents a clear gap in the evidence base and undermines the justification for retaining SS19 in the plan.

This raises serious concerns regarding compliance with the Duty to Cooperate and further undermines the soundness of the Plan.

In conclusion, the main modifications do not adequately address the constraints and concerns highlighted in previous consultations, or during the public hearings. For the

plan to be sound, it depends on modifications being made, however those proposed are vague and lack the detail to demonstrate that they are specific, credible, deliverable or proportionate to the scale of the development in the area.

This fails to align with paragraph 42 of the NPPF which states that 'the more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits'.

I therefore urge the Inspectors to require further modifications, including the removal or reassessment of SS19, to ensure the Plan is sound.

I appreciate the opportunity to comment and urge the Inspectors and the Council to reconsider the Main Modifications to ensure the Local Plan remains robust, equitable, and fit for purpose.

Yours sincerely,

Gillian Hill

REF5.0142

SES29

From meesha elliott [REDACTED]
Date Tue 2026-04-28 4:05 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Sir/Madam,

I am writing to object to the proposed Main Modifications MM410 and MM411 affecting the S13 Green Belt (including sites SES29 and SES30). I consider these proposals to be unsound, as they are not justified, not effective, and not supported by sufficient or up-to-date evidence.

The Council's own Integrated Impact Assessment shows that the modified Plan performs worse for the environment, with negative impacts on soil, land, biodiversity, landscape and transport. The reliance on Green Belt release would lead to the permanent loss of greenfield land and increased car-dependent development, worsening overall environmental outcomes. This clearly demonstrates that the Plan is not justified, as the environmental harm has increased and the Council has not shown that these impacts are acceptable.

In addition, the proposed "Golden Rules" for Green Belt release are too vague to be effective. There are no clear or measurable standards for what constitutes "suitable and effective" mitigation, and no guarantee that these improvements will be delivered. This means the Plan is not effective, as it relies on a vague and unproven package of mitigation without demonstrating how it will work in practice.

The scale of the proposed changes is also significant. The Council's own consultants acknowledge that the modifications represent a major shift in strategy, including a large increase in housing numbers and greater reliance on Green Belt land. However, key issues such as infrastructure, transport access, and cumulative impacts are deferred to later stages, rather than being properly addressed now. This raises serious concerns about whether the proposals are deliverable.

There are also clear site-specific concerns with SES29. The Council appears to be overestimating what the site can deliver, with evidence suggesting significantly less developable land than assumed. The site also presents risks relating to contaminated land and former mining activity, which have not been properly assessed. In addition, access arrangements and required infrastructure improvements are not confirmed or funded, meaning it is unclear how the site could be delivered safely and effectively.

Ecology and biodiversity evidence is also incomplete and out of date. Key assessments were not available at the time decisions were made, and important survey work is still missing. Deferring these issues to later stages does not provide a sound basis for releasing Green Belt land.

Overall, the Plan relies on uncertain assumptions, incomplete evidence, and mitigation measures that are not clearly defined or guaranteed. As such, it does not meet the tests of

soundness.

I therefore request that Main Modifications MM410 and MM411 (sites SES29 and SES30) be removed from the Plan and that this land is retained as Green Belt. I would also like to be notified of the Inspectors' final report and the adoption of the Plan.

Yours faithfully,

Meesha Elliott

Sent from [Outlook for Android](#)

REF5.0143

Site SES30 Bramley Lane/ Beaver Hill Road (MM411)

From Linda Dickinson [REDACTED]
Date Tue 2026-04-28 5:10 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

The above plan has now been seen by inspectors and has been passed if certain modifications are put in place. After reading the modifications I would like to further object to the plan as the modifications are unsound, will not work in practice, and still do not provide justification for building on the green belt. The council's own assessment says the modified plan is actually worse for the environment. It is not enough to say that the "Golden Rules apply". If the council relies on those rules to justify green belt release, it should show clearly what they mean in practice for these sites and how they will be delivered. They have not done this!!

Consequently the plan is not justified and not effective, because it relies on a vague package of improvements without proving deliverability.

The modifications to access requires that all traffic from 827 houses, a school and burial ground would have to use Beaver Hill Road. This road is already heavily used by the fire service, Handsworth grange school, and a football club(which produces heavy street parking), as well as a bus and traffic route from Woodhouse to Handsworth.

Incidentally the recent building of the new Lidl store at the junction of Rotherham road and Retford road has led to an increase in traffic and new traffic lights being installed at the junction which has led to long traffic queues often stretching back to Beaver Hill Road
This shows that safe and suitable access for this development has not been demonstrated.

The Environment Act 2021 states that all new developments are legally required to deliver at least 10% Biodiversity Net Gain(BNG)The council has not shown how this can be achieved on this site and there is no mention of it in the modifications. The council has even suggested the site could be registered as a BNG habitat which is the opposite of building on it.

There are considerable constraints against building on the land, ,ancient woodland, kilometres of hedgerows, veteran trees, public footpaths and coal mining risks and the need for ecological buffers. All these reduce the land actually available for building and the number of houses built, the entire justification for releasing the green belt.

For the plan to succeed on its own figures the council expects 150 homes per year to be built. This is far above the normal rate for a site of this size(typically 60-70), the nearby Waverley site (4000 homes multiple builders);only manages about 150 a year on a very large flat brownfield site with no constraints.
In short the plans numbers don't add up.

9 hectares of the land are being set aside for a school and burial ground but neither of these is confirmed. If these do not go ahead, the modification says that the land will be reconsidered at the first plan view, which means the most likely outcome will be more housing pushing the total to 1000 houses.
The NPPF says that green belt land should only be released for exceptional circumstances.
These circumstances include the school and burial ground, if these don't happen the justification for releasing the land disappears, but the land will have gone .
The plan should not be removing land from the green belt on the basis of uses that will never happen and to deliver housing not part of their plan

I consider Main Modifications MM411 (Site SES30 to be unsound. It is not justified and not consistent with national policy. I

I request that SES30 be removed from the plan and retained as Green Belt.

Regards

Linda Dickinson

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Sent from my iPad

REF5.0144

Gree Belt Lodge Moor propsed 256 houses

From Peter Jackson [REDACTED]

Date Tue 2026-04-28 5:41 PM

To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

Cc [REDACTED]

[REDACTED]

Sirs

The recent proposal to utilise green belt land on Lodge Moor Road would cause stress on local services for which I trust the council has made adequate provision- schools, doctors, transport and roads.

The existing road is barely adequate for existing traffic and would certainly be inadequate for the increase in traffic – most houses will have a car and many will have two, giving an increase of 250 to 500 additional cars in the area.

I trust the council to protect residents and the green belt.

Peter Jackson

[REDACTED]

REF5.0145

Oppose Charnock green belt development

From Amber brooke Hotchen [REDACTED]

Date Tue 2026-04-28 6:00 PM

To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Please dear council we implore you to use the empty buildings all over Sheffield town centre instead of building on our green area. We do not have the school space. The traffic it will cause so much congestion into an already congested area find somewhere else

Dear Strategic Planning Team,

I am writing to object to the proposed Main Modifications to the Sheffield Local Plan, and particularly those that impact site SS19. While I recognise the need for a sound and deliverable plan, several of the modifications materially weaken safeguards that are essential for public safety, statutory compliance, and the fair distribution of development impacts across the city.

For these reasons, the proposed modifications fail to meet the tests of soundness set out in paragraph 36 of the National Planning Policy Framework (NPPF), specifically that the Plan must be justified, effective, and consistent with national policy.

I therefore set out below my objections to specific modifications.

MM7- This reframes the purpose of the Green Belt by highlighting only its role in supporting urban regeneration, while omitting the full set of Green Belt purposes set out in the NPPF. This narrow and reductive wording misrepresents national policy, weakens the strategic function of the Green Belt, and risks distorting future decision-making by implying that regeneration is its primary or sole purpose. Sheffield's Green Belt prevents sprawl and safeguards the countryside, yet MM7's selective emphasis creates an imbalanced narrative that could be used to justify further releases. The modification is therefore not justified, not effective, and should be amended to reflect the complete statutory purposes of the Green Belt.

Further to this, paragraph 5.9.8 of the Impact Assessment Report Addendum:

Modifications Consultation (referred to in this document as IIA from this point, which can be found [here](#)) confirms that 'permanent negative effects would remain' on the environment and landscape character of SS19 as a result of its development. The assessment also confirms in paragraph 5.9.12 that the moderation of allocating green belt sites for development will have predominantly negative effects that will be difficult to fully mitigate. **MM10 MM11 MM90-MM93** - The Sheffield Local Plan relies on a significant windfall

allowance of 7,475 homes out of a total supply of 39,159 homes (MM90), equating to approximately 19% of the overall housing supply.

This represents a substantial proportion of housing delivery being dependent on unallocated and uncertain sites, which by definition are not plan-led. The Plan does not provide sufficient evidence to demonstrate that this level of windfall delivery will be realised in a consistent, sustainable, or timely manner.

MM92 defines that the housing trajectory shows that the Sheffield Local Plan delivers only 298 dwellings above the identified requirement of 38,020 homes.

This represents a margin of less than 1% across the entire plan period, providing no meaningful flexibility to account for delays, non-delivery, viability issues, or infrastructure constraints. This is particularly concerning given the Plan provides only a very small margin above its housing requirement, meaning any shortfall in windfall delivery would result in the Plan failing to meet its targets.

MM18- With SS19 being one of the first green belt sites to be developed, and a year 7 place deficit until 2028/29, this does not provide the assurance that there will be adequate educational provision in the S12 area. Paragraph 3.2.3 of the Integrated Impact Assessment Report Addendum: Modifications Consultation (document [here](#)) states that, if a city centre school was built, it would be unlikely to be ready in time for the forecast peak deficit in places, weakening this mitigation further still. The moderation also fails to address how the educational needs of a post 16 student population, which continues to rise and will peak in 2028/29, will be met. This is a particular concern for S12 as the population will increase significantly with the planned development and south-east Sheffield has no post-16 provision.

There are also significant concerns about primary school provision across the S12 area, with Charnock Primary Academy (the primary school closest to SS19) already being oversubscribed by 33% (Sheffield City Council, 2025). The plan proposes the development of approximately 1,600 new homes in this part of the city (Draft Sheffield Local Plan Interactive Map and Sheffield Additional Site Allocations), growth that would ordinarily require a new primary school if delivered as a single strategic development. However the plan fails to demonstrate that essential education infrastructure can support the proposed level of growth.**MM19-** The wording “include consideration” is non-binding and fails to secure delivery.

The modification does not commit to a new facility, which is not allocated a site, and does not address the spatial mismatch between need and provision. S12, which lies outside the Central Sub-Area, is expected to absorb significant residential growth with just one extra consultation room being allocated to the area in the plan, despite having pockets of high deprivation and subsequent poor health outcomes. MM19 does not demonstrate how healthcare needs arising from this growth will be met, and fails the NPPF tests of effectiveness and justification, and risks exacerbating health inequalities unless strengthened.

Concerns around the impact of development on health and wellbeing are supported by the revised IIA (which can be found [here](#)) which states that ‘some new site allocations may reduce the overall amenity experienced by nearby residents. Although the Plan already includes measures to minimise these effects, it is unlikely that all remaining negative impacts can be fully avoided’. Paragraph 5.2.2 of this document also acknowledges that removal of greenbelt will have ‘some negative effects in terms of mental health and wellbeing’ on surrounding communities.

MM20 -The phrase “wherever practicable” is unacceptably ambiguous in a policy area that is critical to sustainable development and infrastructure delivery. It provides no commitment or assurance that transport improvements will be secured. The modification fails the NPPF tests of effectiveness and clarity, and risks undermining modal shift, accessibility, and safety objectives. It also weakens the plan’s ability to secure equitable outcomes across sub-areas. The wording must be replaced with a firm commitment to secure transport improvements proportionate to development scale and impact, supported by planning obligations and the Infrastructure Delivery Plan. This is particularly important for the S12 area, where transport is a significant concern in relation to the scale of development proposed. The Sheffield Local Plan identifies approximately 1,600 new homes across S12, which will inevitably generate a substantial increase in traffic movements and place additional pressure on an already constrained local road network. However, due to the dispersed spatial distribution of

these allocations, there is currently no clear or coordinated transport strategy demonstrating how the cumulative impact of these developments will be mitigated. The plan does not provide sufficient detail regarding required junction improvements, public transport capacity, pedestrian and cycling infrastructure, or wider highway mitigation measures necessary to support this level of growth. Without clear and deliverable transport commitments, there is a risk that the cumulative traffic impacts will significantly worsen congestion, reduce road safety, and undermine the sustainability of the area. Paragraph 5.6.5. If the IIA states that site SS19 'benefits from its proximity to the blue tram route and a high-frequency bus corridor', however, the lived experience of current residents is that this route is already under pressure during peak times and buses are infrequent and unreliable. As such, it is unclear how the proposed level of housing growth in S12 can be accommodated without substantial and clearly defined transport infrastructure improvements.

MM127 & MM128- The Plan suggests that Green Belt windfall sites could deliver up to 50% affordable housing, but there is no evidence this is achievable in practice. In fact, the Council's own evidence shows that sites like SS19 are only likely to deliver around 30% affordable housing. This creates a clear gap between what the policy promises and what can actually be delivered.

The Plan also relies on "windfall" sites to deliver higher levels of affordable housing. However, windfall sites are uncertain and cannot be guaranteed to come forward, or to deliver the infrastructure and affordable housing needed.

This means the Plan is relying on outcomes that may never happen, while still allowing development on Green Belt land.

The Council's own housing needs evidence shows that the majority of housing need in Sheffield is for affordable housing. However, the Plan relies on sites such as SS19 that are only likely to deliver around 30% affordable housing, alongside uncertain windfall development. This fails to align with the identified need and undermines the justification for releasing Green Belt land. As a result, the approach is not justified, not reliable, and does not provide confidence that the promised affordable housing will be delivered.

MM224 MM 227- These modifications recognise that some sites have constraints (such as flood risk, access issues, and environmental limits), but there is no evidence of any level of recalculation to ascertain the reduction in buildable area and therefore reduction of the number of homes expected from those sites.

This raises concerns that the Plan is overestimating how many homes can actually be delivered. If parts of sites cannot be built on, the total housing numbers should be reduced accordingly.

In the case of sites such as SES13, the Plan acknowledges the need for buffers but does not reassess how this affects the number of homes the site can deliver. More worryingly, SS19 is not included in these modifications even with significant constraints, including flood risk and the ecological corridor as well as additional buffers for the brook and hedgerows, this creates a risk that the Plan is relying on housing numbers that are not realistic, which undermines confidence that the overall housing target can be met & with such a low "buffer" of housing above the target, the plan could fail should the reality be reflected.

As a result, the Plan is not reliable, the modifications are not consistent across sites and does not provide a clear or accurate picture of what can actually be delivered.

MM429 (SS19) - The S12 Green Belt Action Group has submitted two previous consultation statements for MM429 (SS19) which highlight significant site constraints including flood risk and the ecological corridor, the need to protect the robin brook and its impact on the Moss Valley SSSI along with access constraints and hedgerow buffers but SS19 is not referenced in MM224 or MM227, which should require recalculation of housing impact across site allocations. This omission is concerning. If SS19's

constraints are serious enough to warrant modification text, they should also trigger a reassessment of its contribution to housing supply. The failure to cross-reference SS19 in the impact recalculation undermines the credibility of the housing trajectory and suggests that constraint-driven reductions are not being applied consistently. This raises soundness concerns under NPPF paragraph 36(b) and (c): the plan may not be justified or effective if constrained sites are retained without transparent recalibration. The inconsistency also risks undermining spatial equity, as less constrained sites may be overburdened to compensate for undeliverable allocations like SS19.

It is also apparent that even with amended brook buffers and hedgerow buffers, the appropriate buffering has not been removed from the developable area, it is believed this will have an impact on the number of houses that are deliverable on the site and therefore impact the viability of the site.

The modifications also fail to consider the impact of North East Derbyshire District Council's Local Plan, particularly its proposed allocation immediately adjacent to SS19 (site reference 45900), which could deliver a further 348 homes alongside shops or a care facility. It is significant that the landowner, promoter and developer for site 45900 are the same as for SS19, yet NEDDC has assessed 45900 as unsuitable for development due to the same constraints repeatedly raised in relation to SS19.

The development of 45900 would create a single, continuous cross-boundary block of development that would clearly conflict with several of the Green Belt purposes set out in national policy: they would **fail to check the unrestricted sprawl** of the existing built-up area, **erode the separation between Sheffield and North East Derbyshire**, and **constitute significant countryside encroachment**. The two developments would effectively double the size of the Charnock estate with no planned proportionate infrastructure to support this rapid growth.

There appears to have been no meaningful collaboration with Sheffield City Council to assess the combined effects of these neighbouring proposals. The absence of any cross-boundary assessment represents a clear gap in the evidence base and undermines the justification for retaining SS19 in the plan.

This raises serious concerns regarding compliance with the Duty to Cooperate and further undermines the soundness of the Plan.

In conclusion, the main modifications do not adequately address the constraints and concerns highlighted in previous consultations, or during the public hearings. For the plan to be sound, it depends on modifications being made, however those proposed are vague and lack the detail to demonstrate that they are specific, credible, deliverable or proportionate to the scale of the development in the area.

This fails to align with paragraph 42 of the NPPF which states that 'the more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits'.

I therefore urge the Inspectors to require further modifications, including the removal or reassessment of SS19, to ensure the Plan is sound

I appreciate the opportunity to comment and urge the Inspectors and the Council to reconsider the Main Modifications to ensure the Local Plan remains robust, equitable

Amber Hotchen


Oppose Charnock green belt

From Amber brooke Hotchen [REDACTED]
Date Wed 2026-04-29 7:02 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Hello

I have more thoughts on this. You don't hear of the Cotswolds building extreme housing estates on their country side which they have a surplus of. Go and build where the population isn't already over subscribed where there is space in the schools close by and doctors. This isn't Charnock we do not have the capacity to absorb this many residents it's totally unfair and irresponsible. I'm so worried for my children's health building so close to the school what about the air pollution of the cars this is going to bring onto a road white lane that isn't big enough and already suffers with congestion.

Your council is aware of the parking problem already around CHPA traffic wardens regularly have to attend.

Imagine the cars and lorry loads of materials on top of that. A child will get hurt. It's dangerous and not the right the place to be building.

Please please see sense Sheffield city council

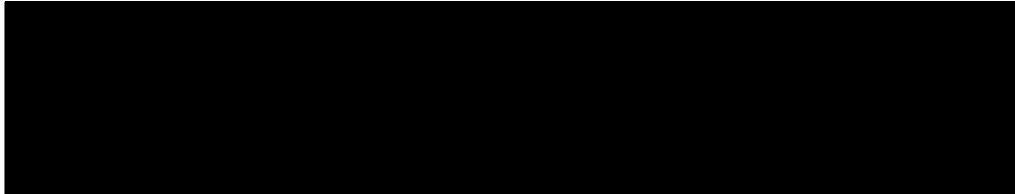
Amber Hotchen

Sent from [Outlook for iOS](#)

REF5.0146

Fwd: Oppose Charnock green belt s12

From [REDACTED]
Date Tue 2026-04-28 6:09 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>



Dear Strategic Planning Team,

I am writing to object to the proposed Main Modifications to the Sheffield Local Plan, and particularly those that impact site SS19. While I recognise the need for a sound and deliverable plan, several of the modifications materially weaken safeguards that are essential for public safety, statutory compliance, and the fair distribution of development impacts across the city. For these reasons, the proposed modifications fail to meet the tests of soundness set out in paragraph 36 of the National Planning Policy Framework (NPPF), specifically that the Plan must be justified, effective, and consistent with national policy. I therefore set out below my objections to specific modifications.

MM7- This reframes the purpose of the Green Belt by highlighting only its role in supporting urban regeneration, while omitting the full set of Green Belt purposes set out in the NPPF. This narrow and reductive wording misrepresents national policy, weakens the strategic function of the Green Belt, and risks distorting future decision-making by implying that regeneration is its primary or sole purpose. Sheffield's Green Belt prevents sprawl and safeguards the countryside, yet MM7's selective emphasis creates an imbalanced narrative that could be used to justify further releases. The modification is therefore not justified, not effective, and should be amended to reflect the complete statutory purposes of the Green Belt.

Further to this, paragraph 5.9.8 of the Impact Assessment Report Addendum: Modifications Consultation (referred to in this document as IIA from this point, which can be found [here](#)) confirms that 'permanent negative effects would remain' on the

environment and landscape character of SS19 as a result of its development. The assessment also confirms in paragraph 5.9.12 that the moderation of allocating green belt sites for development will have predominantly negative effects that will be difficult to fully mitigate.

MM10 MM11 MM90-MM93 - The Sheffield Local Plan relies on a significant windfall allowance of 7,475 homes out of a total supply of 39,159 homes (MM90), equating to approximately 19% of the overall housing supply. This represents a substantial proportion of housing delivery being dependent on unallocated and uncertain sites, which by definition are not plan-led. The Plan does not provide sufficient evidence to demonstrate that this level of windfall delivery will be realised in a consistent, sustainable, or timely manner.

MM92 defines that the housing trajectory shows that the Sheffield Local Plan delivers only 298 dwellings above the identified requirement of 38,020 homes. This represents a margin of less than 1% across the entire plan period, providing no meaningful flexibility to account for delays, non-delivery, viability issues, or infrastructure constraints. This is particularly concerning given the Plan provides only a very small margin above its housing requirement, meaning any shortfall in windfall delivery would result in the Plan failing to meet its targets.

MM18- With SS19 being one of the first green belt sites to be developed, and a year 7 place deficit until 2028/29, this does not provide the assurance that there will be adequate educational provision in the S12 area. Paragraph 3.2.3 of the Integrated Impact Assessment Report Addendum: Modifications Consultation (document [here](#)) states that, if a city centre school was built, it would be unlikely to be ready in time for the forecast peak deficit in places, weakening this mitigation further still. The moderation also fails to address how the educational needs of a post 16 student population, which continues to rise and will peak in 2028/29, will be met. This is a particular concern for S12 as the population will increase significantly with the planned development and south-east Sheffield has no post-16 provision. There are also significant concerns about primary school provision across the S12 area, with Charnock Primary Academy (the primary school closest to SS19) already being oversubscribed by 33% (Sheffield City Council, 2025). The plan proposes the development of approximately 1,600 new homes in this part of the city (Draft Sheffield

Local Plan Interactive Map and Sheffield Additional Site Allocations), growth that would ordinarily require a new primary school if delivered as a single strategic development.

However the plan fails to demonstrate that essential education infrastructure can support the proposed level of growth. **MM19**- The wording "include consideration" is non-binding and fails to secure delivery.

The modification does not commit to a new facility, which is not allocated a site, and does not address the spatial mismatch between need and provision. S12, which lies

outside the Central Sub-Area, is expected to absorb significant residential growth with

just one extra consultation room being allocated to the area in the plan, despite having

pockets of high deprivation and subsequent poor health outcomes. MM19 does not

demonstrate how healthcare needs arising from this growth will be met, and fails the

NPPF tests of effectiveness and justification, and risks exacerbating health inequalities

unless strengthened.

Concerns around the impact of development on health and wellbeing are supported by

the revised IIA (which can be found [here](#)) which states that 'some new site allocations

may reduce the overall amenity experienced by nearby residents. Although the Plan

already includes measures to minimise these effects, it is unlikely that all remaining

negative impacts can be fully avoided'. Paragraph 5.2.2 of this document also acknowledges that removal of greenbelt will have 'some negative effects in terms of

mental health and wellbeing' on surrounding communities.

MM20 -The phrase "wherever practicable" is unacceptably ambiguous in a policy area

that is critical to sustainable development and infrastructure delivery. It provides no

commitment or assurance that transport improvements will be secured. The modification fails the NPPF tests of effectiveness and clarity, and risks

undermining

modal shift, accessibility, and safety objectives. It also weakens the plan's ability to

secure equitable outcomes across sub-areas. The wording must be replaced with a firm

commitment to secure transport improvements proportionate to development scale and

impact, supported by planning obligations and the Infrastructure Delivery Plan.

This is particularly important for the S12 area, where transport is a significant concern in

relation to the scale of development proposed. The Sheffield Local Plan identifies approximately 1,600 new homes across S12, which will inevitably generate a

substantial increase in traffic movements and place additional pressure on an already constrained local road network. However, due to the dispersed spatial distribution of these allocations, there is currently no clear or coordinated transport strategy demonstrating how the cumulative impact of these developments will be mitigated.

The plan does not provide sufficient detail regarding required junction improvements, public transport capacity, pedestrian and cycling infrastructure, or wider highway mitigation measures necessary to support this level of growth. Without clear and deliverable transport commitments, there is a risk that the cumulative traffic impacts will significantly worsen congestion, reduce road safety, and undermine the sustainability of

the area. Paragraph 5.6.5. If the IIA states that site SS19 'benefits from its proximity to the blue tram route and a high-frequency bus corridor', however,

the lived experience of current residents is that this route is already under pressure

during peak times and buses are infrequent and unreliable. As such, it is unclear how

the proposed level of housing growth in S12 can be accommodated without substantial

and clearly defined transport infrastructure improvements.

MM127 & MM128- The Plan suggests that Green Belt windfall sites could deliver up to

50% affordable housing, but there is no evidence this is achievable in practice. In fact,

the Council's own evidence shows that sites like SS19 are only likely to deliver around

30% affordable housing. This creates a clear gap between what the policy promises and

what can actually be delivered.

The Plan also relies on "windfall" sites to deliver higher levels of affordable housing.

However, windfall sites are uncertain and cannot be guaranteed to come forward, or to

deliver the infrastructure and affordable housing needed.

This means the Plan is relying on outcomes that may never happen, while still allowing

development on Green Belt land.

The Council's own housing needs evidence shows that the majority of housing need in

Sheffield is for affordable housing. However, the Plan relies on sites such as SS19 that

are only likely to deliver around 30% affordable housing, alongside uncertain windfall

development. This fails to align with the identified need and undermines the justification

for releasing Green Belt land. As a result, the approach is not justified, not reliable, and

does not provide confidence that the promised affordable housing will be delivered.

MM224 MM 227- These modifications recognise that some sites have constraints (such as flood risk, access issues, and environmental limits), but there is no evidence of any level of recalculation to ascertain the reduction in buildable area and therefore reduction of the number of homes expected from those sites.

This raises concerns that the Plan is overestimating how many homes can actually be delivered. If parts of sites cannot be built on, the total housing numbers should be reduced accordingly.

In the case of sites such as SES13, the Plan acknowledges the need for buffers but

does not reassess how this affects the number of homes the site can deliver. More worryingly, SS19 is not included in these modifications even with significant constraints, including flood risk and the ecological corridor as well as additional buffers

for the brook and hedgerows, this creates a risk that the Plan is relying on housing

numbers that are not realistic, which undermines confidence that the overall housing

target can be met & with such a low "buffer" of housing above the target, the plan could

fail should the reality be reflected.

As a result, the Plan is not reliable, the modifications are not consistent across sites and

does not provide a clear or accurate picture of what can actually be delivered.

MM429 (SS19) - The S12 Green Belt Action Group has submitted two previous consultation statements for MM429 (SS19) which highlight significant site constraints

including flood risk and the ecological corridor, the need to protect the robin brook and

its impact on the Moss Valley SSSI along with access constraints and hedgerow buffers

but SS19 is not referenced in MM224 or MM227, which should require recalculation of

housing impact across site allocations. This omission is concerning. If SS19's constraints are serious enough to warrant modification text, they should also trigger a

reassessment of its contribution to housing supply. The failure to cross-reference SS19

in the impact recalculation undermines the credibility of the housing trajectory and

suggests that constraint-driven reductions are not being applied consistently.

This raises

soundness concerns under NPPF paragraph 36(b) and (c): the plan may not be justified

or effective if constrained sites are retained without transparent recalibration. The inconsistency also risks undermining spatial equity, as less constrained sites may be overburdened to compensate for undeliverable allocations like SS19. It is also apparent that even with amended brook buffers and hedgerow buffers, the appropriate buffering has not been removed from the developable area, it is believed this will have an impact on the number of houses that are deliverable on the site and therefore impact the viability of the site. The modifications also fail to consider the impact of North East Derbyshire District Council's Local Plan, particularly its proposed allocation immediately adjacent to SS19 (site reference 45900), which could deliver a further 348 homes alongside shops or a care facility. It is significant that the landowner, promoter and developer for site 45900 are the same as for SS19, yet NEDDC has assessed 45900 as unsuitable for development due to the same constraints repeatedly raised in relation to SS19. The development of 45900 would create a single, continuous cross-boundary block of development that would clearly conflict with several of the Green Belt purposes set out in national policy: they would **fail to check the unrestricted sprawl** of the existing built-up area, **erode the separation between Sheffield and North East Derbyshire**, and **constitute significant countryside encroachment**. The two developments would effectively double the size of the Charnock estate with no planned proportionate infrastructure to support this rapid growth. There appears to have been no meaningful collaboration with Sheffield City Council to assess the combined effects of these neighbouring proposals. The absence of any cross-boundary assessment represents a clear gap in the evidence base and undermines the justification for retaining SS19 in the plan. This raises serious concerns regarding compliance with the Duty to Cooperate and further undermines the soundness of the Plan. In conclusion, the main modifications do not adequately address the constraints and concerns highlighted in previous consultations, or during the public hearings. For the plan to be sound, it depends on modifications being made, however those proposed are vague and lack the detail to demonstrate that they are specific, credible, deliverable or proportionate to the scale of the development in the area.

This fails to align with paragraph 42 of the NPPF which states that 'the more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits'. I therefore urge the Inspectors to require further modifications, including the removal or reassessment of SS19, to ensure the Plan is sound. I appreciate the opportunity to comment and urge the Inspectors and the Council to reconsider the Main Modifications to ensure the Local Plan remains robust, equitable.

Charlie Hotchen



Oppose Charnock green belt development

From charlie hotchen [REDACTED]

Date Tue 2026-04-28 6:23 PM

To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[REDACTED]

Dear Strategic Planning Team,

This works will cause major destruction to my business, my children's quality of life will be affected. We don't have the infrastructure structure to support more houses and potentially 2000 more residence.

There is no schools in the planning, doctors or shops, and whitelane is already very congested.

The air Quality with the amount of traffic that will be congested and its will affect the whole area, greenbelt should be protected for a reason because once these beautiful places are destroyed there is no going back. I really hope someone sees sense!

Please do not build on our green belt. Use the empty town centre

I am writing to object to the proposed Main Modifications to the Sheffield Local Plan, and particularly those that impact site SS19. While I recognise the need for a sound and deliverable plan, several of the modifications materially weaken safeguards that are essential for public safety, statutory compliance, and the fair distribution of development impacts across the city.

For these reasons, the proposed modifications fail to meet the tests of soundness set out in paragraph 36 of the National Planning Policy Framework (NPPF), specifically that

the Plan must be justified, effective, and consistent with national policy. I therefore set out below my objections to specific modifications.

MM7- This reframes the purpose of the Green Belt by highlighting **only** its role in supporting urban regeneration, while omitting the full set of Green Belt purposes set out

in the NPPF. This narrow and reductive wording misrepresents national policy, weakens the strategic function of the Green Belt, and risks distorting future decision-making by implying that regeneration is its primary or sole purpose. Sheffield's Green Belt prevents sprawl and safeguards the countryside, yet MM7's selective emphasis creates an imbalanced narrative that could be used to justify further releases. The modification is therefore not justified, not effective, and should be amended to reflect the complete statutory purposes of the Green Belt.

Further to this, paragraph 5.9.8 of the Impact Assessment Report Addendum: Modifications Consultation (referred to in this document as IIA from this point, which can be found [here](#)) confirms that 'permanent negative effects would remain' on the environment and landscape character of SS19 as a result of its development. The assessment also confirms in paragraph 5.9.12 that the moderation of allocating green belt sites for development will have predominantly negative effects that will be difficult to fully mitigate. **MM10 MM11 MM90-MM93** - The Sheffield Local Plan relies on a significant windfall allowance of 7,475 homes out of a total supply of 39,159 homes (MM90), equating to approximately 19% of the overall housing supply.

This represents a substantial proportion of housing delivery being dependent on unallocated and uncertain sites, which by definition are not plan-led. The Plan does not provide sufficient evidence to demonstrate that this level of windfall delivery will be realised in a consistent, sustainable, or timely manner.

MM92 defines that the housing trajectory shows that the Sheffield Local Plan delivers only 298 dwellings above the identified requirement of 38,020 homes. This represents a margin of less than 1% across the entire plan period, providing no meaningful flexibility to account for delays, non-delivery, viability issues, or infrastructure constraints. This is particularly concerning given the Plan provides only a very small margin above its housing requirement, meaning any shortfall in windfall delivery would result in the Plan failing to meet its targets.

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the forecast peak deficit in places, weakening this mitigation further still. The moderation also fails to address how the educational needs of a post 16 student population, which continues to rise and will peak in 2028/29, will be met. This is a particular concern for S12 as the population will increase significantly with the planned development and south-east Sheffield has no post-16 provision. There are also significant concerns about primary school provision across the S12 area, with Charnock Primary Academy (the primary school closest to SS19) already being oversubscribed by 33% (Sheffield City Council, 2025). The plan proposes the development of approximately 1,600 new homes in this part of the city (Draft Sheffield Local Plan Interactive Map and Sheffield Additional Site Allocations), growth that would ordinarily require a new primary school if delivered as a single strategic development. However the plan fails to demonstrate that essential education infrastructure can support the proposed level of growth. **MM19**- The wording "include consideration" is non-binding and fails to secure delivery. The modification does not commit to a new facility, which is not allocated a site, and does not address the spatial mismatch between need and provision. S12, which lies outside the Central Sub-Area, is expected to absorb significant residential growth with just one extra consultation room being allocated to the area in the plan, despite having pockets of high deprivation and subsequent poor health outcomes. MM19 does not demonstrate how healthcare needs arising from this growth will be met, and fails the NPPF tests of effectiveness and justification, and risks exacerbating health inequalities unless strengthened. Concerns around the impact of development on health and wellbeing are supported by the revised IIA (which can be found [here](#)) which states that 'some new site allocations may reduce the overall amenity experienced by nearby residents. Although the Plan already includes measures to minimise these effects, it is unlikely that all remaining negative impacts can be fully avoided'. Paragraph 5.2.2 of this document also acknowledges that removal of greenbelt will have 'some negative effects in terms of mental health and wellbeing' on surrounding communities. **MM20** -The phrase "wherever practicable" is unacceptably ambiguous in a policy area

that is critical to sustainable development and infrastructure delivery. It provides no commitment or assurance that transport improvements will be secured. The modification fails the NPPF tests of effectiveness and clarity, and risks undermining modal shift, accessibility, and safety objectives. It also weakens the plan's ability to secure equitable outcomes across sub-areas. The wording must be replaced with a firm commitment to secure transport improvements proportionate to development scale and impact, supported by planning obligations and the Infrastructure Delivery Plan. This is particularly important for the S12 area, where transport is a significant concern in relation to the scale of development proposed. The Sheffield Local Plan identifies approximately 1,600 new homes across S12, which will inevitably generate a substantial increase in traffic movements and place additional pressure on an already constrained local road network. However, due to the dispersed spatial distribution of these allocations, there is currently no clear or coordinated transport strategy demonstrating how the cumulative impact of these developments will be mitigated. The plan does not provide sufficient detail regarding required junction improvements, public transport capacity, pedestrian and cycling infrastructure, or wider highway mitigation measures necessary to support this level of growth. Without clear and deliverable transport commitments, there is a risk that the cumulative traffic impacts will significantly worsen congestion, reduce road safety, and undermine the sustainability of the area. Paragraph 5.6.5. If the IIA states that site SS19 'benefits from its proximity to the blue tram route and a high-frequency bus corridor', however, the lived experience of current residents is that this route is already under pressure during peak times and buses are infrequent and unreliable. As such, it is unclear how the proposed level of housing growth in S12 can be accommodated without substantial and clearly defined transport infrastructure improvements.

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However, windfall sites are uncertain and cannot be guaranteed to come forward, or to deliver the infrastructure and affordable housing needed. This means the Plan is relying on outcomes that may never happen, while still allowing development on Green Belt land. The Council's own housing needs evidence shows that the majority of housing need in Sheffield is for affordable housing. However, the Plan relies on sites such as SS19 that are only likely to deliver around 30% affordable housing, alongside uncertain windfall development. This fails to align with the identified need and undermines the justification for releasing Green Belt land. As a result, the approach is not justified, not reliable, and does not provide confidence that the promised affordable housing will be delivered.

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In the case of sites such as SES13, the Plan acknowledges the need for buffers but does not reassess how this affects the number of homes the site can deliver. More worryingly, SS19 is not included in these modifications even with significant constraints, including flood risk and the ecological corridor as well as additional buffers for the brook and hedgerows, this creates a risk that the Plan is relying on housing numbers that are not realistic, which undermines confidence that the overall housing target can be met & with such a low "buffer" of housing above the target, the plan could fail should the reality be reflected.

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its impact on the Moss Valley SSSI along with access constraints and hedgerow buffers but SS19 is not referenced in MM224 or MM227, which should require recalculation of housing impact across site allocations. This omission is concerning. If SS19's constraints are serious enough to warrant modification text, they should also trigger a reassessment of its contribution to housing supply. The failure to cross-reference SS19 in the impact recalculation undermines the credibility of the housing trajectory and suggests that constraint-driven reductions are not being applied consistently. This raises soundness concerns under NPPF paragraph 36(b) and (c): the plan may not be justified or effective if constrained sites are retained without transparent recalibration. The inconsistency also risks undermining spatial equity, as less constrained sites may be overburdened to compensate for undeliverable allocations like SS19. It is also apparent that even with amended brook buffers and hedgerow buffers, the appropriate buffering has not been removed from the developable area, it is believed this will have an impact on the number of houses that are deliverable on the site and therefore impact the viability of the site. The modifications also fail to consider the impact of North East Derbyshire District Council's Local Plan, particularly its proposed allocation immediately adjacent to SS19 (site reference 45900), which could deliver a further 348 homes alongside shops or a care facility. It is significant that the landowner, promoter and developer for site 45900 are the same as for SS19, yet NEDDC has assessed 45900 as unsuitable for development due to the same constraints repeatedly raised in relation to SS19. The development of 45900 would create a single, continuous cross-boundary block of development that would clearly conflict with several of the Green Belt purposes set out in national policy: they would **fail to check the unrestricted sprawl** of the existing built-up area, **erode the separation between Sheffield and North East Derbyshire**, and **constitute significant countryside encroachment**. The two developments would effectively double the size of the Charnock estate with no planned proportionate infrastructure to support this rapid growth. There appears to have been no meaningful collaboration with Sheffield City Council to assess the combined effects of these neighbouring proposals. The absence of any

cross-boundary assessment represents a clear gap in the evidence base and undermines the justification for retaining SS19 in the plan. This raises serious concerns regarding compliance with the Duty to Cooperate and further undermines the soundness of the Plan. In conclusion, the main modifications do not adequately address the constraints and concerns highlighted in previous consultations, or during the public hearings. For the plan to be sound, it depends on modifications being made, however those proposed are vague and lack the detail to demonstrate that they are specific, credible, deliverable or proportionate to the scale of the development in the area. This fails to align with paragraph 42 of the NPPF which states that 'the more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits'. I therefore urge the Inspectors to require further modifications, including the removal or reassessment of SS19, to ensure the Plan is sound. I appreciate the opportunity to comment and urge the Inspectors and the Council to

reconsider the Main Modifications to ensure the Local Plan remains robust, equitable

Charlie Hotchen


Sent from [Outlook for iOS](#)

REF5.0147

Please give details of why you consider the proposed modification or document that you are commenting on is not legally compliant or is unsound.

Please be as precise as possible. If you wish to support the legal compliance or soundness of the document or proposed modification, please also use this box to set out your comments.

I consider the proposed Sheffield Local Plan to be unsound, particularly in relation to the scale and concentration of development proposed within the S35 postcode area (including Chapeltown, Ecclesfield, Grenoside, High Green and Oughtibridge).

Under the tests of soundness set out in national policy, I do not believe the Plan is consistent with national policy because “sound plans should be positively prepared, justified, effective and consistent with national policy” (NPPF, paragraph 35).

1. Not Justified - Disproportionate Distribution of Development

The Plan is not justified because it does not represent an appropriate or proportionate spatial strategy.

The NPPF requires that strategic policies are informed by proportionate evidence and reasonable alternatives, and that they are “an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence” (NPPF, paragraph 35).

The concentration of development in S35 is excessive when compared to other parts of the city.

The Plan proposes over 1,600 homes within S35, including large allocations at Wheel/Yew Lane, Chapeltown Road, Grenoside, Middleton Lane and surrounding sites. This represents a significant and localised concentration of growth within a single postcode, rather than a balanced distribution across Sheffield.

There is insufficient evidence presented to demonstrate why this level of development is the most appropriate option when considered against reasonable alternatives, particularly given the constraints already affecting the area.

2. Not Effective - Infrastructure is Not Clearly Deliverable

The Plan is not effective because it does not demonstrate that the necessary supporting infrastructure will be delivered in a timely or coordinated way.

The NPPF states that strategic policies should be “deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred” (NPPF, paragraph 35).

It also requires that plans are supported by infrastructure provision, stating that “it is important that a sufficient choice of sites is available in suitable locations, taking into account the infrastructure needed to support them” (NPPF, paragraph 20).

Transport

The S35 area is already heavily constrained in terms of transport infrastructure. Key routes such as the A61 corridor and access to the M1 (Junction 35) are frequently congested.

As a community clinician commuting daily from Hall Wood Road along the A61 towards Sheffield Children’s Hospital, I experience this congestion firsthand. Journeys are already slow and unreliable. The addition of over 1,600 homes will generate thousands of additional vehicle movements, yet there is no clear, funded or deliverable scheme to significantly improve road capacity or reduce congestion in this area.

Employment Land and HGV Traffic

The allocation of land for “general employment” uses within S35 is also a concern. This type of designation typically results in warehousing and distribution uses, which generate substantial HGV traffic. The cumulative impact of residential and employment growth will place unsustainable pressure on the same constrained road network, further undermining the Plan’s effectiveness.

Healthcare

The NPPF is clear that planning should support “local health and well-being strategies” and enable “the provision of health facilities” (NPPF, paragraph 95).

Primary care capacity is already stretched. At my local GP surgery Chapelgreen Practice, NHS patient survey data indicates that over half of patients report difficulty booking appointments. This reflects existing capacity issues.

Despite this, the Plan does not include clear, deliverable proposals for new GP provision, expansion of existing practices, or workforce increases in S35. Without this, additional population growth will further reduce access to healthcare.

Education

The NPPF also requires that planning decisions and policies support “the provision and use of community services and facilities such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship” (NPPF, paragraph 95), which includes education infrastructure.

Whilst the Plan indicates that additional school provision may be required, potentially including new schools, there is no clear, site-specific, fully funded or time-bound commitment to deliver this in step with housing growth in S35.

There is insufficient detail regarding:

- Location of new provision
- Number of places to be created
- Delivery timescales
- Secured funding mechanisms

This creates a clear risk that housing occupation will precede education provision, placing pressure on existing schools.

3. Not Consistent with National Policy - Lack of Infrastructure-Led Development

National planning policy requires that development is supported by adequate infrastructure and integrated planning.

The NPPF states that plans should “set out the contributions expected from development, including the levels and types of affordable housing provision required, along with other infrastructure” (NPPF, paragraph 34).

It also expects that planning should operate in line with the objective of achieving sustainable development, defined as meeting needs including “accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being” (NPPF, paragraph 8).

In this case, infrastructure provision (transport, healthcare, education) remains uncertain, high-level, and not clearly linked to delivery mechanisms or timing.

This indicates that development is being led by housing targets rather than infrastructure capacity, which is inconsistent with national policy on sustainable development.

4. Not Positively Prepared - Failure to Address Existing Constraints

The Plan does not adequately account for existing pressures within S35, including:

- Chronic road congestion
- Limited GP appointment availability
- Pressure on school places

- Established reliance on constrained transport corridors

Rather than addressing these issues, the Plan risks exacerbating them significantly.

A positively prepared plan should meet “the area’s objectively assessed needs, as well as any needs that cannot be met within neighbouring areas” (NPPF, paragraph 35), but must do so in a way that is realistic and supported by infrastructure capacity.

5. Green Belt Release - Localised Harm Not Properly Balanced

The NPPF is clear that Green Belt boundaries should only be altered where “exceptional circumstances are fully evidenced and justified” (NPPF, paragraph 140), and that authorities should demonstrate they have examined fully all other reasonable options for meeting development needs before releasing Green Belt land.

Although the overall percentage of Green Belt release across Sheffield may be relatively small, the impact is highly concentrated in S35.

The scale of release in this area undermines the purposes of the Green Belt, including preventing urban sprawl and maintaining separation between settlements.

The Plan does not sufficiently demonstrate that exceptional circumstances justify this level of localised harm, particularly when infrastructure constraints remain unresolved.

Conclusion

For the reasons outlined above, I consider the Plan to be unsound in relation to S35 because it is:

- Not justified, due to disproportionate concentration of development
- Not effective, due to lack of clearly deliverable infrastructure
- Not consistent with national policy, due to absence of infrastructure-led planning
- Not positively prepared, as it fails to address existing constraints

I would urge that the Plan is reconsidered to:

- Provide a more balanced distribution of development across Sheffield
- Ensure that infrastructure is clearly defined, funded, and delivered in advance of or alongside development

- Reduce reliance on Green Belt land in areas already under significant pressure

Without these changes, the proposed development in S35 risks creating unsustainable communities and placing unacceptable strain on existing residents and services, repeating the pattern of decisions made without sufficient regard to local impact that was evidenced in the Sheffield street trees dispute, where widespread public concern arose from a perceived failure to properly balance policy delivery with the lived experience and priorities of affected communities. This would further undermine public confidence in the planning process and reinforce the perception that major local decisions are being made without sufficient regard to cumulative impacts and wider community wellbeing.

Please set out the change(s) you consider necessary to make the proposed modification or document legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.

You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Suggested Changes Required to Make the Plan Sound and Legally Compliant (S35 Area)

In order to make the Local Plan sound in respect of the S35 allocations, I consider that the following changes are necessary. These changes are required to ensure the Plan is “positively prepared, justified, effective and consistent with national policy” (NPPF, paragraph 35).

1. Rebalancing of Spatial Distribution of Growth

Required change:

Reduce the concentration of housing and employment allocations within the S35 postcode area and redistribute a proportion of growth to other parts of Sheffield where infrastructure capacity is greater or where fewer cumulative constraints exist.

Suggested revised supporting text:

“Development will be distributed across the city in a manner that reflects infrastructure capacity, environmental constraints, and the need to ensure balanced and sustainable growth across all communities.”

Why this is necessary for soundness:

This change is required to make the Plan “justified”, as the current level of concentration in S35 is not supported by proportionate evidence demonstrating that it is the most appropriate strategy when reasonable alternatives exist. It would also improve compliance with NPPF paragraph 35, which requires strategies to be based on reasonable alternatives and proportionate evidence.

It would also support “positively prepared planning” by ensuring development is planned in a way that meets needs without overburdening a single locality.

2. Infrastructure-Led Development Requirement**Required change:**

Insert a clear policy requirement that major allocations in S35 will only come forward where supporting infrastructure is fully funded, agreed, and deliverable in step with development.

Suggested policy wording:

“Development in S35 will be permitted only where it is demonstrated that necessary infrastructure, including highways improvements, education provision, healthcare capacity, and utility infrastructure, is secured and deliverable in a timely manner to serve the scale of development proposed. Occupation of new housing will be phased to align with the delivery of identified infrastructure.”

Why this is necessary for soundness:

This is required to make the Plan “effective” and “consistent with national policy”, particularly NPPF paragraph 20 and paragraph 34, which require that development is supported by infrastructure and that plans set out how infrastructure will be delivered.

Without this change, there is a clear risk that development will proceed ahead of infrastructure capacity, leading to unsustainable outcomes.

3. Transport Capacity and Mitigation Requirement**Required change:**

Strengthen policy wording to require demonstrable evidence of highway capacity and funded mitigation schemes before development is permitted.

Suggested policy wording:

“Proposals within S35 must be supported by a Transport Assessment demonstrating that the cumulative impact of development on the local and strategic road network can be satisfactorily mitigated. Development will not be supported where residual

cumulative impacts would result in severe congestion or unacceptable highway safety impacts.”

Why this is necessary for soundness:

This change ensures compliance with NPPF paragraph 110, which states that development should only be prevented or refused where residual cumulative impacts are severe. It also ensures the Plan is “effective”, as it links growth to deliverable transport solutions rather than assumptions of future capacity improvements.

4. Healthcare and Education Delivery Requirements

Required change:

Include explicit requirements for the delivery of additional GP and school capacity in advance of or alongside development.

Suggested policy wording:

“Residential development within S35 must be supported by confirmed arrangements for the delivery or expansion of primary healthcare and education provision, with capacity delivered in phase with population growth to ensure no net loss of service accessibility for existing or future residents.”

Why this is necessary for soundness:

This is required to ensure the Plan is “positively prepared” and “consistent with national policy”, particularly NPPF paragraph 95, which supports the provision of health, education and community services.

It ensures that essential services are not overwhelmed by new development.

5. Green Belt Exceptional Circumstances Justification (S35-specific)

Required change:

Strengthen the evidence base and supporting text to explicitly demonstrate exceptional circumstances for Green Belt release in S35, including a detailed assessment of alternatives and cumulative local impacts.

Suggested revised text:

“The release of Green Belt land in S35 is justified only where exceptional circumstances have been clearly evidenced, including a full assessment of reasonable alternatives, and where the development is supported by necessary infrastructure and will not result in unacceptable harm to the purposes of the Green Belt.”

Why this is necessary for soundness:

This is required for legal compliance and soundness, ensuring alignment with NPPF

paragraph 140, which states that Green Belt boundaries should only be altered in exceptional circumstances.

Without stronger justification, the Plan risks being found unsound due to insufficient demonstration of exceptional circumstances at a localised level.

6. Monitoring, Phasing, and Infrastructure Delivery Mechanism

Required change:

Introduce a clear monitoring and phasing framework tied to infrastructure triggers for S35 allocations.

Suggested policy wording:

“Development in S35 will be subject to a phasing framework linked to the delivery of identified infrastructure. Annual monitoring will assess infrastructure delivery against housing completions, and further permissions may be restricted where infrastructure provision falls behind agreed thresholds.”

Why this is necessary for soundness:

This ensures the Plan is “effective”, as required by NPPF paragraph 35, by ensuring delivery is realistic, monitored, and adaptable over time.

Overall Conclusion

These changes are necessary to ensure the Local Plan is:

- “Justified”, by providing a more balanced and evidence-based distribution of growth
- “Effective”, by ensuring infrastructure is deliverable and properly phased
- “Consistent with national policy”, particularly in relation to infrastructure provision and Green Belt release
- “Positively prepared”, by ensuring existing and future community needs are properly addressed

Without these modifications, the Plan risks allocating development in a way that is not infrastructure-led, places disproportionate pressure on S35, and fails to meet the requirements of national planning policy.

Ultimately it is important to emphasise that the concerns raised cannot be addressed through wording changes or policy tightening alone. Whilst strengthened policy

language and clearer infrastructure requirements are necessary, they are not sufficient in themselves to make the Plan sound. The fundamental issue is the underlying spatial strategy, which results in a disproportionate and concentrated level of growth within the S35 area. To be consistent with national policy and to meet the tests of soundness, the Plan requires a substantive revision of its housing distribution, with a more balanced and equitable allocation of development across Sheffield as a whole. Without this structural change to the spatial strategy, any amendments to policy wording would fail to resolve the core issue of unsustainable concentration of development and the associated infrastructure pressures identified.

REF5.0148

Objection to the Proposed Main Modifications to the Sheffield Local Plan- site SS19

From Emily Bowler [REDACTED]

Date Tue 2026-04-28 7:23 PM

To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

Graymail

External email

[REDACTED]

Dear Strategic Planning Team,

I am writing to object to the proposed Main Modifications to the Sheffield Local Plan,

and particularly those that impact site SS19. While I recognise the need for a sound and

deliverable plan, several of the modifications materially weaken safeguards that are

essential for public safety, statutory compliance, and the fair distribution of development

impacts across the city.

For these reasons, the proposed modifications fail to meet the tests of soundness set

out in paragraph 36 of the National Planning Policy Framework (NPPF), specifically that

the Plan must be justified, effective, and consistent with national policy.

I therefore set out below my objections to specific modifications.

MM7- This reframes the purpose of the Green Belt by highlighting only its role in

supporting urban regeneration, while omitting the full set of Green Belt purposes set out

in the NPPF. This narrow and reductive wording misrepresents national policy, weakens

the strategic function of the Green Belt, and risks distorting future decision-making by

implying that regeneration is its primary or sole purpose. Sheffield's Green Belt prevents

sprawl and safeguards the countryside, yet MM7's selective emphasis creates an

imbalanced narrative that could be used to justify further releases. The modification is

therefore not justified, not effective, and should be amended to reflect the complete

statutory purposes of the Green Belt.

Further to this, paragraph 5.9.8 of the Impact Assessment Report Addendum: Modifications Consultation (referred to in this document as IIA from this point, which can

be found [here](#)) confirms that 'permanent negative effects would remain' on the environment and landscape character of SS19 as a result of its development.

The

assessment also confirms in paragraph 5.9.12 that the moderation of allocating green

belt sites for development will have predominantly negative effects that will be difficult to

fully mitigate. **MM10 MM11 MM90-MM93** - The Sheffield Local Plan relies on a significant windfall

allowance of 7,475 homes out of a total supply of 39,159 homes (MM90), equating to

approximately 19% of the overall housing supply.

This represents a substantial proportion of housing delivery being dependent on

unallocated and uncertain sites, which by definition are not plan-led. The Plan does not

provide sufficient evidence to demonstrate that this level of windfall delivery will be

realised in a consistent, sustainable, or timely manner.

MM92 defines that the housing trajectory shows that the Sheffield Local Plan delivers

only 298 dwellings above the identified requirement of 38,020 homes.

This represents a margin of less than 1% across the entire plan period, providing no

meaningful flexibility to account for delays, non-delivery, viability issues, or infrastructure

constraints. This is particularly concerning given the Plan provides only a very small

margin above its housing requirement, meaning any shortfall in windfall delivery would

result in the Plan failing to meet its targets.

MM18- With SS19 being one of the first green belt sites to be developed, and a year 7

place deficit until 2028/29, this does not provide the assurance that there will be

adequate educational provision in the S12 area. Paragraph 3.2.3 of the Integrated

Impact Assessment Report Addendum: Modifications Consultation (document [here](#))

states that, if a city centre school was built, it would be unlikely to be ready in time for

the forecast peak deficit in places, weakening this mitigation further still. The moderation

also fails to address how the educational needs of a post 16 student population, which continues to rise and will peak in 2028/29, will be met. This is a particular concern for S12 as the population will increase significantly with the planned development and south-east Sheffield has no post-16 provision. There are also significant concerns about primary school provision across the S12 area, with Charnock Primary Academy (the primary school closest to SS19) already being oversubscribed by 33% (Sheffield City Council, 2025). The plan proposes the development of approximately 1,600 new homes in this part of the city (Draft Sheffield Local Plan Interactive Map and Sheffield Additional Site Allocations), growth that would ordinarily require a new primary school if delivered as a single strategic development. However the plan fails to demonstrate that essential education infrastructure can support the proposed level of growth. **MM19-** The wording “include consideration” is non-binding and fails to secure delivery. The modification does not commit to a new facility, which is not allocated a site, and does not address the spatial mismatch between need and provision. S12, which lies outside the Central Sub-Area, is expected to absorb significant residential growth with just one extra consultation room being allocated to the area in the plan, despite having pockets of high deprivation and subsequent poor health outcomes. MM19 does not demonstrate how healthcare needs arising from this growth will be met, and fails the NPPF tests of effectiveness and justification, and risks exacerbating health inequalities unless strengthened. Concerns around the impact of development on health and wellbeing are supported by the revised IIA (which can be found [here](#)) which states that ‘some new site allocations may reduce the overall amenity experienced by nearby residents. Although the Plan already includes measures to minimise these effects, it is unlikely that all remaining negative impacts can be fully avoided’. Paragraph 5.2.2 of this document also

acknowledges that removal of greenbelt will have 'some negative effects in terms of mental health and wellbeing' on surrounding communities.

MM20 -The phrase "wherever practicable" is unacceptably ambiguous in a policy area that is critical to sustainable development and infrastructure delivery. It provides no commitment or assurance that transport improvements will be secured. The modification fails the NPPF tests of effectiveness and clarity, and risks undermining modal shift, accessibility, and safety objectives. It also weakens the plan's ability to secure equitable outcomes across sub-areas. The wording must be replaced with a firm commitment to secure transport improvements proportionate to development scale and impact, supported by planning obligations and the Infrastructure Delivery Plan.

This is particularly important for the S12 area, where transport is a significant concern in relation to the scale of development proposed. The Sheffield Local Plan identifies approximately 1,600 new homes across S12, which will inevitably generate a substantial increase in traffic movements and place additional pressure on an already constrained local road network. However, due to the dispersed spatial distribution of these allocations, there is currently no clear or coordinated transport strategy demonstrating how the cumulative impact of these developments will be mitigated.

The plan does not provide sufficient detail regarding required junction improvements, public transport capacity, pedestrian and cycling infrastructure, or wider highway mitigation measures necessary to support this level of growth. Without clear and deliverable transport commitments, there is a risk that the cumulative traffic impacts will significantly worsen congestion, reduce road safety, and undermine the sustainability of the area. Paragraph 5.6.5. If the IIA states that site SS19 'benefits from its proximity to the blue tram route and a high-frequency bus corridor', however, the lived experience of current residents is that this route is already under pressure during peak times and buses are infrequent and unreliable. As such, it is unclear how

the proposed level of housing growth in S12 can be accommodated without substantial

and clearly defined transport infrastructure improvements.

MM127 & MM128- The Plan suggests that Green Belt windfall sites could deliver up to

50% affordable housing, but there is no evidence this is achievable in practice. In fact,

the Council's own evidence shows that sites like SS19 are only likely to deliver around

30% affordable housing. This creates a clear gap between what the policy promises and

what can actually be delivered.

The Plan also relies on "windfall" sites to deliver higher levels of affordable housing.

However, windfall sites are uncertain and cannot be guaranteed to come forward, or to

deliver the infrastructure and affordable housing needed.

This means the Plan is relying on outcomes that may never happen, while still allowing

development on Green Belt land.

The Council's own housing needs evidence shows that the majority of housing need in

Sheffield is for affordable housing. However, the Plan relies on sites such as SS19 that

are only likely to deliver around 30% affordable housing, alongside uncertain windfall

development. This fails to align with the identified need and undermines the justification

for releasing Green Belt land. As a result, the approach is not justified, not reliable, and

does not provide confidence that the promised affordable housing will be delivered.

MM224 MM 227- These modifications recognise that some sites have constraints (such

as flood risk, access issues, and environmental limits), but there is no evidence of any

level of recalculation to ascertain the reduction in buildable area and therefore reduction

of the number of homes expected from those sites.

This raises concerns that the Plan is overestimating how many homes can actually be

delivered. If parts of sites cannot be built on, the total housing numbers should be

reduced accordingly.

In the case of sites such as SES13, the Plan acknowledges the need for buffers but

does not reassess how this affects the number of homes the site can deliver. More worryingly, SS19 is not included in these modifications even with significant constraints, including flood risk and the ecological corridor as well as additional buffers for the brook and hedgerows, this creates a risk that the Plan is relying on housing numbers that are not realistic, which undermines confidence that the overall housing target can be met & with such a low “buffer” of housing above the target, the plan could fail should the reality be reflected.

As a result, the Plan is not reliable, the modifications are not consistent across sites and does not provide a clear or accurate picture of what can actually be delivered.

MM429 (SS19) - The S12 Green Belt Action Group has submitted two previous consultation statements for MM429 (SS19) which highlight significant site constraints including flood risk and the ecological corridor, the need to protect the robin brook and its impact on the Moss Valley SSSI along with access constraints and hedgerow buffers but SS19 is not referenced in MM224 or MM227, which should require recalculation of housing impact across site allocations. This omission is concerning. If SS19’s constraints are serious enough to warrant modification text, they should also trigger a reassessment of its contribution to housing supply. The failure to cross-reference SS19 in the impact recalculation undermines the credibility of the housing trajectory and suggests that constraint-driven reductions are not being applied consistently. This raises soundness concerns under NPPF paragraph 36(b) and (c): the plan may not be justified or effective if constrained sites are retained without transparent recalibration. The inconsistency also risks undermining spatial equity, as less constrained sites may be overburdened to compensate for undeliverable allocations like SS19. It is also apparent that even with amended brook buffers and hedgerow buffers, the appropriate buffering has not been removed from the developable area, it is believed this will have an impact on the number of houses that are deliverable on the site and therefore impact the viability of the site.

The modifications also fail to consider the impact of North East Derbyshire District Council's Local Plan, particularly its proposed allocation immediately adjacent to SS19 (site reference 45900), which could deliver a further 348 homes alongside shops or a care facility. It is significant that the landowner, promoter and developer for site 45900 are the same as for SS19, yet NEDDC has assessed 45900 as unsuitable for development due to the same constraints repeatedly raised in relation to SS19.

The development of 45900 would create a single, continuous cross-boundary block of development that would clearly conflict with several of the Green Belt purposes set out in national policy: they would **fail to check the unrestricted sprawl** of the existing built-up area, **erode the separation between Sheffield and North East Derbyshire**, and **constitute significant countryside encroachment**. The two developments would effectively double the size of the Charnock estate with no planned proportionate infrastructure to support this rapid growth.

There appears to have been no meaningful collaboration with Sheffield City Council to assess the combined effects of these neighbouring proposals. The absence of any cross-boundary assessment represents a clear gap in the evidence base and undermines the justification for retaining SS19 in the plan. This raises serious concerns regarding compliance with the Duty to Cooperate and further undermines the soundness of the Plan.

In conclusion, the main modifications do not adequately address the constraints and concerns highlighted in previous consultations, or during the public hearings. For the plan to be sound, it depends on modifications being made, however those proposed are vague and lack the detail to demonstrate that they are specific, credible, deliverable or proportionate to the scale of the development in the area. This fails to align with paragraph 42 of the NPPF which states that 'the more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits'.

I therefore urge the Inspectors to require further modifications, including the removal or reassessment of SS19, to ensure the Plan is sound
I appreciate the opportunity to comment and urge the Inspectors and the Council to reconsider the Main Modifications to ensure the Local Plan remains robust, equitable, and fit for purpose.

Yours sincerely,

Emily Bowler

Sent from [Outlook for iOS](#)

REF5.0149

Springwell Field, Beighton - Site SES03 Proposed Modification

From Kevin Kelly [REDACTED]
Date Tue 2026-04-28 7:29 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[REDACTED]

Dear Sir/Madam,

I am writing to submit my comments on Site SES03 in the Schedule of Proposed Main Modifications to the Sheffield Plan.

I do not consider the Plan to be sound for the following reasons

Air quality concerns

Monitoring data previously collected at the Moss Way/Donetsk Way site, close to the proposed development area, recorded nitrogen dioxide levels of 46–48 $\mu\text{g}/\text{m}^3$ between 2012 and 2015, exceeding the legal limit of 40 $\mu\text{g}/\text{m}^3$ in each recorded year. Monitoring at this location was subsequently discontinued. Following a Freedom of Information request, the Council confirmed that it does not hold information explaining why this monitoring ceased. At present, there is no active air quality monitoring in the immediate vicinity of Eckington Way, despite the scale of development proposed.

Transport capacity and infrastructure

The Council's own transport evidence indicates that junctions on Eckington Way are operating at or above capacity, with figures ranging between 101% and 118%. During the examination process, the Head of Transport confirmed that there are currently no funded or planned highway improvements to address these issues, either for existing pressures or those arising from additional proposed allocations.

Public transport provision

The site was assessed as having very poor access to public transport. The proposed reopening of the Barrow Hill Line, previously referenced as a justification for development in this area, was cancelled in July 2024 and has not been replaced with alternative funding or proposals.

Ecology and biodiversity

There is evidence of skylarks, a Red List bird species, nesting on the site. No ecological survey has been undertaken specifically for this area, despite the presence of potentially protected wildlife.

Agricultural land quality

The site has been identified by the Council's own officers as Grade 2 agricultural land, classified as best and most versatile farmland.

In light of the above, I do not believe Site SES03 has been properly justified or assessed, and I therefore object to its inclusion.

Please confirm receipt of this information.

Yours faithfully,

Kevin Kelly



REF5.0150

Objection to the Proposed Main Modifications to the Sheffield Local Plan- site SS19

From Becky Hurst [REDACTED]
Date Tue 2026-04-28 7:39 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[REDACTED]

Dear Strategic Planning Team,

I am writing to object to the proposed Main Modifications to the Sheffield Local Plan, and particularly those that impact site SS19. While I recognise the need for a sound and deliverable plan, several of the modifications materially weaken safeguards that are essential for public safety, statutory compliance, and the fair distribution of development impacts across the city. For these reasons, the proposed modifications fail to meet the tests of soundness set out in paragraph 36 of the National Planning Policy Framework (NPPF), specifically that the Plan must be justified, effective, and consistent with national policy. I therefore set out below my objections to specific modifications.

MM7- This reframes the purpose of the Green Belt by highlighting only its role in supporting urban regeneration, while omitting the full set of Green Belt purposes set out in the NPPF. This narrow and reductive wording misrepresents national policy, weakens the strategic function of the Green Belt, and risks distorting future decision-making by implying that regeneration is its primary or sole purpose. Sheffield's Green Belt prevents sprawl and safeguards the countryside, yet MM7's selective emphasis creates an imbalanced narrative that could be used to justify further releases. The modification is therefore not justified, not effective, and should be amended to reflect the complete

statutory purposes of the Green Belt.

Further to this, paragraph 5.9.8 of the Impact Assessment Report Addendum: Modifications Consultation (referred to in this document as IIA from this point, which can

be found [here](#)) confirms that 'permanent negative effects would remain' on the environment and landscape character of SS19 as a result of its development.

The

assessment also confirms in paragraph 5.9.12 that the moderation of allocating green

belt sites for development will have predominantly negative effects that will be difficult to

fully mitigate. **MM10 MM11 MM90-MM93** - The Sheffield Local Plan relies on a significant windfall

allowance of 7,475 homes out of a total supply of 39,159 homes (MM90), equating to

approximately 19% of the overall housing supply.

This represents a substantial proportion of housing delivery being dependent on

unallocated and uncertain sites, which by definition are not plan-led. The Plan does not

provide sufficient evidence to demonstrate that this level of windfall delivery will be

realised in a consistent, sustainable, or timely manner.

MM92 defines that the housing trajectory shows that the Sheffield Local Plan delivers

only 298 dwellings above the identified requirement of 38,020 homes.

This represents a margin of less than 1% across the entire plan period, providing no

meaningful flexibility to account for delays, non-delivery, viability issues, or infrastructure

constraints. This is particularly concerning given the Plan provides only a very small

margin above its housing requirement, meaning any shortfall in windfall delivery would

result in the Plan failing to meet its targets.

MM18- With SS19 being one of the first green belt sites to be developed, and a year 7

place deficit until 2028/29, this does not provide the assurance that there will be

adequate educational provision in the S12 area. Paragraph 3.2.3 of the Integrated

Impact Assessment Report Addendum: Modifications Consultation (document [here](#))

states that, if a city centre school was built, it would be unlikely to be ready in time for

the forecast peak deficit in places, weakening this mitigation further still. The moderation

also fails to address how the educational needs of a post 16 student population, which continues to rise and will peak in 2028/29, will be met. This is a particular concern for S12 as the population will increase significantly with the planned development and south-east Sheffield has no post-16 provision. There are also significant concerns about primary school provision across the S12 area, with Charnock Primary Academy (the primary school closest to SS19) already being oversubscribed by 33% (Sheffield City Council, 2025). The plan proposes the development of approximately 1,600 new homes in this part of the city (Draft Sheffield Local Plan Interactive Map and Sheffield Additional Site Allocations), growth that would ordinarily require a new primary school if delivered as a single strategic development. However the plan fails to demonstrate that essential education infrastructure can support the proposed level of growth. **MM19-** The wording “include consideration” is non-binding and fails to secure delivery. The modification does not commit to a new facility, which is not allocated a site, and does not address the spatial mismatch between need and provision. S12, which lies outside the Central Sub-Area, is expected to absorb significant residential growth with just one extra consultation room being allocated to the area in the plan, despite having pockets of high deprivation and subsequent poor health outcomes. MM19 does not demonstrate how healthcare needs arising from this growth will be met, and fails the NPPF tests of effectiveness and justification, and risks exacerbating health inequalities unless strengthened. Concerns around the impact of development on health and wellbeing are supported by the revised IIA (which can be found [here](#)) which states that ‘some new site allocations may reduce the overall amenity experienced by nearby residents. Although the Plan already includes measures to minimise these effects, it is unlikely that all remaining negative impacts can be fully avoided’. Paragraph 5.2.2 of this document also

acknowledges that removal of greenbelt will have 'some negative effects in terms of mental health and wellbeing' on surrounding communities.

MM20 -The phrase "wherever practicable" is unacceptably ambiguous in a policy area that is critical to sustainable development and infrastructure delivery. It provides no commitment or assurance that transport improvements will be secured. The modification fails the NPPF tests of effectiveness and clarity, and risks undermining modal shift, accessibility, and safety objectives. It also weakens the plan's ability to secure equitable outcomes across sub-areas. The wording must be replaced with a firm commitment to secure transport improvements proportionate to development scale and impact, supported by planning obligations and the Infrastructure Delivery Plan.

This is particularly important for the S12 area, where transport is a significant concern in relation to the scale of development proposed. The Sheffield Local Plan identifies approximately 1,600 new homes across S12, which will inevitably generate a substantial increase in traffic movements and place additional pressure on an already constrained local road network. However, due to the dispersed spatial distribution of these allocations, there is currently no clear or coordinated transport strategy demonstrating how the cumulative impact of these developments will be mitigated.

The plan does not provide sufficient detail regarding required junction improvements, public transport capacity, pedestrian and cycling infrastructure, or wider highway mitigation measures necessary to support this level of growth. Without clear and deliverable transport commitments, there is a risk that the cumulative traffic impacts will significantly worsen congestion, reduce road safety, and undermine the sustainability of the area. Paragraph 5.6.5. If the IIA states that site SS19 'benefits from its proximity to the blue tram route and a high-frequency bus corridor', however, the lived experience of current residents is that this route is already under pressure during peak times and buses are infrequent and unreliable. As such, it is unclear how

the proposed level of housing growth in S12 can be accommodated without substantial

and clearly defined transport infrastructure improvements.

MM127 & MM128- The Plan suggests that Green Belt windfall sites could deliver up to

50% affordable housing, but there is no evidence this is achievable in practice. In fact,

the Council's own evidence shows that sites like SS19 are only likely to deliver around

30% affordable housing. This creates a clear gap between what the policy promises and

what can actually be delivered.

The Plan also relies on "windfall" sites to deliver higher levels of affordable housing.

However, windfall sites are uncertain and cannot be guaranteed to come forward, or to

deliver the infrastructure and affordable housing needed.

This means the Plan is relying on outcomes that may never happen, while still allowing

development on Green Belt land.

The Council's own housing needs evidence shows that the majority of housing need in

Sheffield is for affordable housing. However, the Plan relies on sites such as SS19 that

are only likely to deliver around 30% affordable housing, alongside uncertain windfall

development. This fails to align with the identified need and undermines the justification

for releasing Green Belt land. As a result, the approach is not justified, not reliable, and

does not provide confidence that the promised affordable housing will be delivered.

MM224 MM 227- These modifications recognise that some sites have constraints (such

as flood risk, access issues, and environmental limits), but there is no evidence of any

level of recalculation to ascertain the reduction in buildable area and therefore reduction

of the number of homes expected from those sites.

This raises concerns that the Plan is overestimating how many homes can actually be

delivered. If parts of sites cannot be built on, the total housing numbers should be

reduced accordingly.

In the case of sites such as SES13, the Plan acknowledges the need for buffers but

does not reassess how this affects the number of homes the site can deliver. More worryingly, SS19 is not included in these modifications even with significant constraints, including flood risk and the ecological corridor as well as additional buffers for the brook and hedgerows, this creates a risk that the Plan is relying on housing numbers that are not realistic, which undermines confidence that the overall housing target can be met & with such a low “buffer” of housing above the target, the plan could fail should the reality be reflected.

As a result, the Plan is not reliable, the modifications are not consistent across sites and does not provide a clear or accurate picture of what can actually be delivered.

MM429 (SS19) - The S12 Green Belt Action Group has submitted two previous consultation statements for MM429 (SS19) which highlight significant site constraints including flood risk and the ecological corridor, the need to protect the robin brook and its impact on the Moss Valley SSSI along with access constraints and hedgerow buffers but SS19 is not referenced in MM224 or MM227, which should require recalculation of housing impact across site allocations. This omission is concerning. If SS19’s constraints are serious enough to warrant modification text, they should also trigger a reassessment of its contribution to housing supply. The failure to cross-reference SS19 in the impact recalculation undermines the credibility of the housing trajectory and suggests that constraint-driven reductions are not being applied consistently. This raises soundness concerns under NPPF paragraph 36(b) and (c): the plan may not be justified or effective if constrained sites are retained without transparent recalibration. The inconsistency also risks undermining spatial equity, as less constrained sites may be overburdened to compensate for undeliverable allocations like SS19. It is also apparent that even with amended brook buffers and hedgerow buffers, the appropriate buffering has not been removed from the developable area, it is believed this will have an impact on the number of houses that are deliverable on the site and

therefore impact the viability of the site.

The modifications also fail to consider the impact of North East Derbyshire District

Council's Local Plan, particularly its proposed allocation immediately adjacent to SS19

(site reference 45900), which could deliver a further 348 homes alongside shops or a

care facility. It is significant that the landowner, promoter and developer for site 45900

are the same as for SS19, yet NEDDC has assessed 45900 as unsuitable for development due to the same constraints repeatedly raised in relation to SS19.

The development of 45900 would create a single, continuous cross-boundary block of

development that would clearly conflict with several of the Green Belt purposes set out

in national policy: they would **fail to check the unrestricted sprawl** of the existing built-up area, **erode the separation between Sheffield and North East Derbyshire**,

and **constitute significant countryside encroachment**. The two developments would

effectively double the size of the Charnock estate with no planned proportionate

infrastructure to support this rapid growth.

There appears to have been no meaningful collaboration with Sheffield City Council to

assess the combined effects of these neighbouring proposals. The absence of any

cross-boundary assessment represents a clear gap in the evidence base and undermines the justification for retaining SS19 in the plan.

This raises serious concerns regarding compliance with the Duty to Cooperate and

further undermines the soundness of the Plan.

In conclusion, the main modifications do not adequately address the constraints and

concerns highlighted in previous consultations, or during the public hearings.

For the

plan to be sound, it depends on modifications being made, however those proposed are

vague and lack the detail to demonstrate that they are specific, credible, deliverable or

proportionate to the scale of the development in the area.

This fails to align with paragraph 42 of the NPPF which states that 'the more issues that

can be resolved at pre-application stage, including the need to deliver improvements in

infrastructure and affordable housing, the greater the benefits'.

I therefore urge the Inspectors to require further modifications, including the removal or reassessment of SS19, to ensure the Plan is sound
I appreciate the opportunity to comment and urge the Inspectors and the Council to reconsider the Main Modifications to ensure the Local Plan remains robust, equitable, and fit for purpose.

Kind regards,
Becky

Objection to the Proposed Main Modifications to the Sheffield Local Plan- site SS19

From Becky Hurst [REDACTED]

Date Tue 2026-04-28 7:40 PM

To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[REDACTED]

Dear Strategic Planning Team,

I am writing to object to the proposed Main Modifications to the Sheffield Local Plan, and particularly those that impact site SS19. While I recognise the need for a sound and deliverable plan, several of the modifications materially weaken safeguards that are essential for public safety, statutory compliance, and the fair distribution of development impacts across the city.

For these reasons, the proposed modifications fail to meet the tests of soundness set out in paragraph 36 of the National Planning Policy Framework (NPPF), specifically that the Plan must be justified, effective, and consistent with national policy.

I therefore set out below my objections to specific modifications.

MM7- This reframes the purpose of the Green Belt by highlighting only its role in supporting urban regeneration, while omitting the full set of Green Belt purposes set out in the NPPF. This narrow and reductive wording misrepresents national policy, weakens the strategic function of the Green Belt, and risks distorting future decision-making by implying that regeneration is its primary or sole purpose. Sheffield's Green Belt prevents sprawl and safeguards the countryside, yet MM7's selective emphasis creates an imbalanced narrative that could be used to justify further releases. The modification is therefore not justified, not effective, and should be amended to reflect the complete statutory purposes of the Green Belt.

Further to this, paragraph 5.9.8 of the Impact Assessment Report Addendum: Modifications Consultation (referred to in this document as IIA from this point, which can be found [here](#)) confirms that 'permanent negative effects would remain' on the environment and landscape character of SS19 as a result of its development. The assessment also confirms in paragraph 5.9.12 that the moderation of allocating green belt sites for development will have predominantly negative effects that will be difficult to fully mitigate.**MM10 MM11 MM90-MM93** - The Sheffield Local Plan relies on a significant windfall allowance of 7,475 homes out of a total supply of 39,159 homes (MM90), equating to approximately 19% of the overall housing supply.

This represents a substantial proportion of housing delivery being dependent on unallocated and uncertain sites, which by definition are not plan-led. The Plan does not provide sufficient evidence to demonstrate that this level of windfall delivery will be realised in a consistent, sustainable, or timely manner.

MM92 defines that the housing trajectory shows that the Sheffield Local Plan delivers only 298 dwellings above the identified requirement of 38,020 homes.

This represents a margin of less than 1% across the entire plan period, providing no meaningful flexibility to account for delays, non-delivery, viability issues, or infrastructure constraints. This is particularly concerning given the Plan provides only a very small margin above its housing requirement, meaning any shortfall in windfall delivery would result in the Plan failing to meet its targets.

MM18- With SS19 being one of the first green belt sites to be developed, and a year 7 place deficit until 2028/29, this does not provide the assurance that there will be adequate educational provision in the S12 area. Paragraph 3.2.3 of the Integrated Impact Assessment Report Addendum: Modifications Consultation (document [here](#))

states that, if a city centre school was built, it would be unlikely to be ready in time for the forecast peak deficit in places, weakening this mitigation further still. The moderation also fails to address how the educational needs of a post 16 student population, which continues to rise and will peak in 2028/29, will be met. This is a particular concern for S12 as the population will increase significantly with the planned development and south-east Sheffield has no post-16 provision.

There are also significant concerns about primary school provision across the S12 area, with Charnock Primary Academy (the primary school closest to SS19) already being oversubscribed by 33% (Sheffield City Council, 2025). The plan proposes the development of approximately 1,600 new homes in this part of the city (Draft Sheffield Local Plan Interactive Map and Sheffield Additional Site Allocations), growth that would ordinarily require a new primary school if delivered as a single strategic development. However the plan fails to demonstrate that essential education infrastructure can support the proposed level of growth. **MM19**- The wording “include consideration” is non-binding and fails to secure delivery.

The modification does not commit to a new facility, which is not allocated a site, and does not address the spatial mismatch between need and provision. S12, which lies outside the Central Sub-Area, is expected to absorb significant residential growth with just one extra consultation room being allocated to the area in the plan, despite having pockets of high deprivation and subsequent poor health outcomes. **MM19** does not demonstrate how healthcare needs arising from this growth will be met, and fails the NPPF tests of effectiveness and justification, and risks exacerbating health inequalities unless strengthened.

Concerns around the impact of development on health and wellbeing are supported by the revised IIA (which can be found [here](#)) which states that ‘some new site allocations may reduce the overall amenity experienced by nearby residents. Although the Plan already includes measures to minimise these effects, it is unlikely that all remaining negative impacts can be fully avoided’. Paragraph 5.2.2 of this document also acknowledges that removal of greenbelt will have ‘some negative effects in terms of mental health and wellbeing’ on surrounding communities.

MM20 -The phrase “wherever practicable” is unacceptably ambiguous in a policy area that is critical to sustainable development and infrastructure delivery. It provides no commitment or assurance that transport improvements will be secured. The modification fails the NPPF tests of effectiveness and clarity, and risks undermining modal shift, accessibility, and safety objectives. It also weakens the plan’s ability to secure equitable outcomes across sub-areas. The wording must be replaced with a firm commitment to secure transport improvements proportionate to development scale and impact, supported by planning obligations and the Infrastructure Delivery Plan.

This is particularly important for the S12 area, where transport is a significant concern in relation to the scale of development proposed. The Sheffield Local Plan identifies approximately 1,600 new homes across S12, which will inevitably generate a substantial increase in traffic movements and place additional pressure on an already constrained local road network. However, due to the dispersed spatial distribution of these allocations, there is currently no clear or coordinated transport strategy demonstrating how the cumulative impact of these developments will be mitigated. The plan does not provide sufficient detail regarding required junction improvements, public transport capacity, pedestrian and cycling infrastructure, or wider highway mitigation measures necessary to support this level of growth. Without clear and deliverable transport commitments, there is a risk that the cumulative traffic impacts will significantly worsen congestion, reduce road safety, and undermine the sustainability of the area. Paragraph 5.6.5. If the IIA states that site SS19 ‘benefits from its proximity to the blue tram route and a high-frequency bus corridor’, however, the lived experience of current residents is that this route is already under pressure during peak times and buses are infrequent and unreliable. As such, it is unclear how the proposed level of housing growth in S12 can be accommodated without substantial and clearly defined transport infrastructure improvements.

MM127 & MM128- The Plan suggests that Green Belt windfall sites could deliver up to 50% affordable housing, but there is no evidence this is achievable in practice. In fact, the Council’s own evidence shows that sites like SS19 are only likely to deliver around 30% affordable housing. This creates a clear gap between what the policy promises and what can actually be delivered.

The Plan also relies on “windfall” sites to deliver higher levels of affordable housing. However, windfall sites are uncertain and cannot be guaranteed to come forward, or to deliver the infrastructure and affordable housing needed.

This means the Plan is relying on outcomes that may never happen, while still allowing development on Green Belt land.

The Council's own housing needs evidence shows that the majority of housing need in Sheffield is for affordable housing. However, the Plan relies on sites such as SS19 that are only likely to deliver around 30% affordable housing, alongside uncertain windfall development. This fails to align with the identified need and undermines the justification for releasing Green Belt land. As a result, the approach is not justified, not reliable, and does not provide confidence that the promised affordable housing will be delivered.

MM224 MM 227- These modifications recognise that some sites have constraints (such as flood risk, access issues, and environmental limits), but there is no evidence of any level of recalculation to ascertain the reduction in buildable area and therefore reduction of the number of homes expected from those sites.

This raises concerns that the Plan is overestimating how many homes can actually be delivered. If parts of sites cannot be built on, the total housing numbers should be reduced accordingly.

In the case of sites such as SES13, the Plan acknowledges the need for buffers but does not reassess how this affects the number of homes the site can deliver. More worryingly, SS19 is not included in these modifications even with significant constraints, including flood risk and the ecological corridor as well as additional buffers for the brook and hedgerows, this creates a risk that the Plan is relying on housing numbers that are not realistic, which undermines confidence that the overall housing target can be met & with such a low “buffer” of housing above the target, the plan could fail should the reality be reflected.

As a result, the Plan is not reliable, the modifications are not consistent across sites and does not provide a clear or accurate picture of what can actually be delivered.

MM429 (SS19) - The S12 Green Belt Action Group has submitted two previous consultation statements for MM429 (SS19) which highlight significant site constraints including flood risk and the ecological corridor, the need to protect the robin brook and its impact on the Moss Valley SSSI along with access constraints and hedgerow buffers but SS19 is not referenced in MM224 or MM227, which should require recalculation of housing impact across site allocations. This omission is concerning. If SS19's constraints are serious enough to warrant modification text, they should also trigger a reassessment of its contribution to housing supply. The failure to cross-reference SS19 in the impact recalculation undermines the credibility of the housing trajectory and suggests that constraint-driven reductions are not being applied consistently. This raises soundness concerns under NPPF paragraph 36(b) and (c): the plan may not be justified or effective if constrained sites are retained without transparent recalibration. The inconsistency also risks undermining spatial equity, as less constrained sites may be overburdened to compensate for undeliverable allocations like SS19.

It is also apparent that even with amended brook buffers and hedgerow buffers, the appropriate buffering has not been removed from the developable area, it is believed this will have an impact on the number of houses that are deliverable on the site and therefore impact the viability of the site.

The modifications also fail to consider the impact of North East Derbyshire District Council's Local Plan, particularly its proposed allocation immediately adjacent to SS19 (site reference 45900), which could deliver a further 348 homes alongside shops or a care facility. It is significant that the landowner, promoter and developer for site 45900 are the same as for SS19, yet NEDDC has assessed 45900 as unsuitable for development due to the same constraints repeatedly raised in relation to SS19.

The development of 45900 would create a single, continuous cross-boundary block of development that would clearly conflict with several of the Green Belt purposes set out in national policy: they would **fail to check the unrestricted sprawl** of the existing built-up area, **erode the separation between Sheffield and North East Derbyshire**, and **constitute significant countryside encroachment**. The two developments would effectively double the size of the Charnock estate with no planned proportionate infrastructure to support this rapid growth.

There appears to have been no meaningful collaboration with Sheffield City Council to assess the combined effects of these neighbouring proposals. The absence of any

cross-boundary assessment represents a clear gap in the evidence base and undermines the justification for retaining SS19 in the plan.

This raises serious concerns regarding compliance with the Duty to Cooperate and further undermines the soundness of the Plan.

In conclusion, the main modifications do not adequately address the constraints and concerns highlighted in previous consultations, or during the public hearings. For the plan to be sound, it depends on modifications being made, however those proposed are vague and lack the detail to demonstrate that they are specific, credible, deliverable or proportionate to the scale of the development in the area.

This fails to align with paragraph 42 of the NPPF which states that 'the more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits'.

I therefore urge the Inspectors to require further modifications, including the removal or reassessment of SS19, to ensure the Plan is sound

I appreciate the opportunity to comment and urge the Inspectors and the Council to reconsider the Main Modifications to ensure the Local Plan remains robust, equitable, and fit for purpose.

Yours sincerely,



Becky Hurst

