

Sheffield Plan Main Modifications

Responses – by email

Reference numbers REF5.0251 to REF5.0300

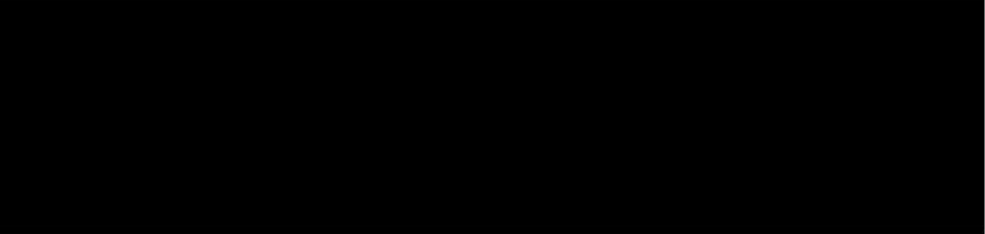
Reference Number	Respondent Name	Organisation
REF5.0251	Kathryn Lomas	Individual
REF5.0252	Matthew Pegler	Individual
REF5.0253	Gary Wolstenholme	Individual
REF5.0254	Not specified	Wharncliffe Side “Let’s Breathe” Community Group
REF5.0255	Paula Richmond	Individual
REF5.0256	Alison Barfoot	Individual
REF5.0257	Melanie Baldock	Individual
REF5.0258	L Cocker	Individual
REF5.0259	Karen Riley	Individual
REF5.0260	D Cocker	Individual
REF5.0261	Joanne Currie	Individual
REF5.0262	C Wall	Individual
REF5.0263	Sadie Charlton	Individual
REF5.0264	Chloe Hazelby	Individual
REF5.0265	Lindsey Hudson	Individual
REF5.0266	Not specified	Individual
REF5.0267	Paul Foster	Individual
REF5.0268	Kevin Carter	Individual
REF5.0269	Emma Lines	Individual
REF5.0270	Vicky Russell	Individual
REF5.0271	Mark	Individual
REF5.0272	Michelle Bond	Individual
REF5.0273	Derek Walton	Individual
REF5.0274	Anja Charlesworth	Individual
REF5.0275	Jennifer Poole	Individual
REF5.0276	Becky Travis-Brooker	Sheffield Green Belt Alliance
REF5.0277	Angela Brown	Individual
REF5.0278	Heather Dewick	Individual
REF5.0279	Lorraine Mellor	Individual

REF5.0280	Brian Trinder	Individual
REF5.0281	Karen Bloom	Individual
REF5.0282	Danny Allsebrook	Individual
REF5.0283	Rachel Patrick	Individual
REF5.0284	Brendan Gillespie	Individual
REF5.0285	Calum Bond	Individual
REF5.0286	Chloe Sylvester	Individual
REF5.0287	P Talbot	Individual
REF5.0288	Not specified	Individual
REF5.0289	Lauren Walker	Individual
REF5.0290	Mandy Robertson	Individual
REF5.0291	Kerry Siddall	Individual
REF5.0292	Katie Hardie	Individual
REF5.0293	Nicola & Lee Talbot	Individual
REF5.0294	Irene & John Watson	Individual
REF5.0295	Suzanne Elliott	Individual
REF5.0296	Dave Sheldon	Individual
REF5.0297	Jane Childs	Individual
REF5.0298	Lisa, Steven, Jordan & Zak Ives	Individual
REF5.0299	Amanda Taylor	Individual
REF5.0300	Sarah Timmins	Individual

REF5.0251

Objection to the proposed main modifications to the local plan at site SS19

From [REDACTED]
Date Sun 2026-05-03 7:44 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. 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 reconsider and look at the removal of SS19.

I appreciate the opportunity to comment and urge the Inspectors and the Council to think again about the Main Modifications to ensure the Local Plan remains robust, fair, and fit for purpose.

We all need to remember that once this Green belt is gone it is gone forever and there is no going back, we have a huge responsibility to future generations to safeguard and preserve it.

Yours Sincerely

Kathryn Lomas



REF5.0252

Objection to the Local Plan Main Modifications

From [REDACTED]
Date Sun 2026-05-03 8:17 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

To: Sheffield City Council Planning Policy Team / Government Inspectors

Regarding: Sheffield Local Plan – Main Modifications Consultation (March 2026)

Subject: Objection to Green Belt Release based on Brownfield Under-utilisation

Dear Inspectors and the Planning Team,

I am writing to formally object to the proposed Main Modifications of the Sheffield Local Plan which involve the release of Green Belt land for housing and employment. My objection is based on the fact that "exceptional circumstances" for Green Belt release have not been met, as the Council has failed to demonstrate that all brownfield and under-utilised urban land has been fully exhausted. The sites I am most concerned about is the concentration of suggested sites in S35. I don't feel there is an equal distribution across the city. Certainly not for employment land. Warren Lane site is absolutely not necessary and I can explain why.

Specifically, I wish to draw the Inspectors' attention to the following discrepancies:

1. Publicly Owned Brownfield Stagnation: Several high-capacity sites currently on the Brownfield Land Register remain undeveloped despite being in public ownership for years. If the Council is "maximising" brownfield, why are the following sites still empty?

- Site S00768 (Attercliffe Waterside): Capacity for ~600 homes. This Council-owned site has been on the register since 2017.
- Site S00769 (Former Cannon Brewery/Fitzalan Works): Capacity for ~450 homes. This site has remained derelict for years while Green Belt sites are being fast-tracked.
- Site S00747 (Furnace Hill): Capacity for ~120 homes.

2. Land Banking via Partnership Agreements:

The Council appears to be "holding" land through the Sheffield Housing Company (SHC) partnership rather than delivering it. Site S00672 (Musgrave Road) is a clear example where the Council owns the land, but the register states it will only be "drawn down" when funding is secure. This is not "maximising" supply; it is market-timing.

3. Inaccurate Windfall and Capacity Estimates:

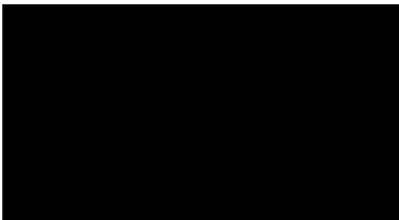
The current plan underestimates the capacity of "micro-sites" and the potential

for re-designating stagnant "employment-only" brownfield sites for mixed-use housing. Until these urban options are aggressively pursued through Compulsory Purchase Orders (CPOs) or higher density mandates, the destruction of the Green Belt is premature.

I request that the Inspectors require the Council to produce a more robust Brownfield First delivery timetable with mandatory start dates for publicly owned sites before any Green Belt boundaries are altered.

Yours faithfully,

Matthew Pegler



REF5.0253

Point relating to Main Modifications Documents

From [Redacted]
Date Sun 2026-05-03 8:26 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>
Cc [Redacted]

External email

Dear [Recipient Name],

Please accept this as my final objection regarding the proposed developments. I believe the conduct of this process has been negligent toward residents, the environment, and the wellbeing of future generations.

My objections focus primarily on site SES30. Previous assessments have identified this greenbelt land as high value. Although recorded by volunteers, our findings show the area is a vibrant ecosystem teeming with wildlife, including foxes, badgers, deer, pheasants, bats, and various bird and small mammal species. Documentation of this biodiversity can be viewed here:

<https://youtu.be/lrHiG8eSwLk?si=KPkCQj4whFLwgGfG>

Your own documents state that development will "reduce openness and alter landscape function, with complete mitigation difficult to achieve" and that "residual negative effects are likely to remain." Given the density of development proposed for this community alongside site SES29, the cumulative impact is excessive. These two sites together exhaust the remaining open space in the area.

Furthermore, the plans mention necessary road improvements without providing specific details. Local infrastructure is already over capacity due to the nearby Waverley development. While Waverley falls under a different jurisdiction, its impact on our local resources and character is significant and cannot be ignored.

Finally, the Integrated Impact Assessment Report Addendum (MM68 Policy SA5) suggests these allocations are only the beginning, with plans to treat surrounding areas as "windfall sites" for further growth. I urge you to reconsider the scale of these developments and the permanent damage they will cause to this ecosystem and community.

I trust you will do the right thing and reconsider your plans.

Regards,

Gary Wolstenholme

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Gary Wolstenholme



REF5.0254

Sheffield Plan – Main Modifications Representation (Site NWS31)

From [REDACTED]
Date Sun 2026-05-03 8:26 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Planning Inspector,

We submit this representation on the Main Modifications to the Sheffield Plan, specifically regarding Site NWS31 (land between Storth Lane and School Lane).

Introduction

There are significant unresolved issues affecting the viability of Site NWS31, including flood risk, access, and highway constraints. These have not been fully assessed. Development would also cause clear harm to local residents, particularly through loss of valued green space and impacts on health and wellbeing.

The Council acknowledges that Green Belt allocations involve sustainability “trade-offs.” If communities are expected to accept these impacts, there must be clear evidence that sites are suitable and deliverable. Without this, removing Green Belt protection is unjustified.

If development proceeds, mitigation and compensation must be robust, inclusive, and effective for both residents and wildlife. Current proposals fall short.

The Plan cannot be considered sound unless:

Full site investigations are completed before allocation, and

Sufficient detail is provided to ensure deliverable mitigation.

A preferable alternative would be to remove NWS31 and prioritise identified Windfall or Opportunity Sites, including brownfield land. Updated demographic trends (declining birth rates and overseas student numbers) also call into question the need for additional Green Belt release. Housing requirements should be reassessed accordingly.

MM332 – Site-Specific Concerns

1. Loss of Green Space (Conditions 1 & 3)

The site is well-used and valued by the community. Development would result in a significant loss of accessible green space, negatively impacting wellbeing.

Proposed compensatory measures are inadequate:

Replacement spaces are further away and often exceed recommended walking distances

Many areas are less accessible, unsafe, or unsuitable (e.g. steep, wooded, flood-prone)

Provision does not meet the needs of vulnerable groups (elderly, disabled, children)

This raises concerns under the Equality Act 2010, as those with Protected Characteristics would be disproportionately affected.

Required change:

Main Modifications must require retention of accessible on-site green space, designed in collaboration with the community and suitable for all users.

2. Flood Risk (Condition 4)

The site has known groundwater and drainage issues not identified in the SFRA. Waterlogging is widespread and affects both the site and surrounding village.

Evidence includes:

Regular waterlogging beyond floodplain areas

Wider village drainage problems

Historical construction issues on nearby developments

Existing flood mitigation planting on site

Required change:

A full groundwater and drainage assessment must be completed before development, including climate impacts and feasibility of mitigation.

3. Biodiversity (Conditions 8–10)

The Modifications fail to address Protected Species despite clear evidence (e.g. bats, barn owls).

The site has high biodiversity value, yet:

Protected species are not fully assessed

Biodiversity Net Gain (BNG) is incomplete

Mitigation measures lack detail

Required changes:

Full assessment of Protected Species and habitats

Inclusion of watercourse in BNG calculations

Strong mitigation measures (buffers, lighting controls, habitat protection)

Retention of grassland areas

Removal of "where feasible" to ensure BNG is delivered on-site

Conclusion

The Main Modifications are not sound without:

Robust, upfront assessment of site viability

Adequate and deliverable mitigation

Updated housing need evidence

Given the availability of alternative sites and changing demographics, Site NWS31 should be removed from allocation.

Yours sincerely,

Wharnccliffe Side "Let's Breathe" Community Group

REF5.0255

MM410/MM411/SES29/SES30

From [REDACTED]
Date Sun 2026-05-03 8:32 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

As a resident of S13, I would like to put on record my objection to the Main Modifications proposed to the Sheffield Local Plan, particularly MM410 and MM411, which relate to the SES29 and SES30 sites. I consider these to be unsound, unfair and think both sites should be removed.

Some of my many concerns stem from the existing strain on local infrastructure. Currently, there is a demonstrable lack of essential services, including adequate healthcare facilities, school capacity, and dental provisions. Furthermore, the anticipated increase in population will undoubtedly exacerbate traffic congestion and negatively impact air quality.

The loss of greenbelt will no doubt have a serious impact on the mental health and wellbeing of residents of S13 myself included. It also appears that the reduction of these vital natural spaces may disproportionately affect certain communities. Furthermore, observations suggest that more affluent regions are not experiencing a similar loss of their greenbelt. This disparity warrants further investigation into equitable urban planning practices. I believe it is crucial to consider the broader implications of such development decisions.

The loss of wildlife habitats that will occur due to this development on greenbelt areas is disgraceful. These invaluable natural spaces are crucial for biodiversity and provide essential ecosystem services to our communities. It is alarming to witness the irreversible damage being inflicted upon these fragile environments. The current trajectory of proposed construction poses a significant threat to numerous species that rely on these habitats for survival. I urge you to consider the long-term ecological consequences of these developments.

Paula Richmond (A 2nd class citizen because i dont live in an affluent area of Sheffield)

Sent from my Galaxy

REF5.0256

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

From [REDACTED]
Date Sun 2026-05-03 8:45 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 sheffieldplan@sheffield.gov.uk's 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.

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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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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.

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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.

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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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.

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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.

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,

Alison Barfoot (Mrs)

REF5.0257

Objection to MM410 and MM411 (SES29 and SES30)

From [REDACTED]
Date Sun 2026-05-03 8:54 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

As a resident of S13, I object to Main Modifications MM410 and MM411 relating to sites SES29 and SES30. These proposals are unsound and both sites should be removed from the Local Plan and retained as Green Belt.

Environmental concerns

The Integrated Impact Assessment shows the modified Plan performs worse on biodiversity, landscape and transport. SES30 is of high ecological importance, yet there is no clear plan to meet Biodiversity Net Gain requirements. Key ecological evidence is incomplete or was produced after allocation, and SES29 also lacks up-to-date data. Mitigation cannot be relied upon without robust evidence.

Lack of evidence and deliverability

The proposals rely on vague assumptions and unclear "Golden Rules" for Green Belt release. On SES30, key elements like a school and burial ground are unconfirmed, undermining the case for exceptional circumstances. On SES29, major constraints remain unresolved, including the absence of a full mining survey and uncertainty over developable land. Build-out rates appear unrealistic, raising serious doubts about deliverability and consistency with national policy.

Transport and infrastructure

These sites would worsen congestion in already pressured areas such as Beaver Hill Road and Retford Road, with clear risks to air quality and safety. There are no credible or funded mitigation plans, and development is being directed towards car-dependent locations rather than higher-density urban areas.

Process concerns

The consultation process lacks transparency, with key evidence introduced late. Changes of this scale should not be made through Main Modifications alone.


Conclusion

MM410 and MM411 are not justified, not deliverable, and not consistent with national policy. SES29 and SES30 should be removed from the Plan and remain Green Belt.

Yours Sincerely

REF5.0258

Response to Main Modifications NES37/MM-351

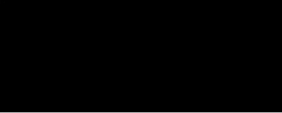
From 
Date Sun 2026-05-03 8:56 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Sheffield Local Plan

Response to Main Modifications

L Cocker


May 3, 2026

Modification Reference: MM-351 (Site NES37 – Land between Creswick Avenue and Yew Lane, S35 8QN)

I object to the allocation of site NES37 because it is **unsound and not legally compliant**. The council has failed to demonstrate the 'Exceptional Circumstances' required by the NPPF for Green Belt release.

- 1. Green Belt Purpose:** The development would result in significant urban sprawl, physically merging the distinct communities of Grenoside, Ecclesfield, and Parson Cross. Golden Rules must apply, including delivering 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 proposed alternative to this green space is for residents to use Grenoside Woods instead. This is not a suitable alternative for many residents due to distance, steep hills and safety (ie woodlands are **not** safe, open spaces for everyone). Green Belt should only be used for development when a local need is proven. No local need has been proven for housing, secondary school education, or for a multi-faith burial ground. If any sections of the site are found to not be required, this could result in the site not needing to be removed from the Green Belt as the Golden Rules will not be met. NES37 should therefore be removed from the Plan.
- 2. Loss of Working Farm:** NES37 is a productive, tenanted working farm. Its development contradicts national policy to protect agricultural land and support food security. Because of legal implications relating to the tenancy of this Sheffield City Council owned site, NES37 is not guaranteed to be available for the Plan and should therefore not be included. Inclusion of this site could be detrimental to the whole of the Sheffield Local Plan if it is later deemed to be undeliverable.
- 3. Sustainability:** The removal of this green space will have a detrimental impact on the physical and mental wellbeing of local residents and biodiversity, which has not been adequately mitigated by the proposed changes.

4. **Environmental & Ecological Impact:** The development would destroy irreplaceable habitats, mature and ancient trees and hedges and wildlife corridors. Insufficient assessments have been undertaken to fully realise the impact that development will have on this site. These assessments should be done **before** the site is included in the plan.
5. **Infrastructure Capacity:** Local pre-schools, primary schools, GP and dental surgeries will be overwhelmed by the inclusion of this site. These services are struggling at present and are unable to take on more pupils and patients. Local GP surgeries have no physical room for expansion. Traffic congestion and air pollution are a major factor; there is physically no room to widen roads around site NES37, and no mitigation plans. Bus services do not operate on Wheel Lane, The Wheel or Town End Road due to the very narrow 'pinch-points' along this route. This will lead to the creation of car-dependent housing, in contradiction of climate goals.
6. **Landscape/Character:** The inclusion of site NES37 will destroy the semi-rural character of the area. The merging of three distinct areas will result in the loss of a beautiful, well-loved and well-used large green space and the loss of identity. Both Grenoside and Ecclesfield are ancient areas and the local history will be impacted severely. "This site is identified as containing historical landscape characteristics, an area of known archaeological interest and contributes to the setting of nearby Heritage Assets." Ecclesfield is one of the oldest areas in the north of Sheffield and has a Grade I Listed church. There are the remains of medieval strip fields on Town End Farm, of which no mention of protection is indicated.
7. **Accumulative Assessment:** Site NES37 is in close proximity to several other sites which are planned for housing development. Site NES39 is directly opposite, sites NES38 and CH05 are close by. There are also three industrial/warehousing development sites nearby; NES36, CH03 and CH04. No accumulative assessment for these 7 sites in S35 has been undertaken. No mitigation measures regarding increased traffic volumes in Ecclesfield and Grenoside, including LGVs and HGVs have been offered. These roads form part of a major route across Sheffield and already operate at high capacity. Accumulative assessment has also not been undertaken with regard to health care services.
8. **Integrated Impact Assessment:** The council's own IAA states that the modified Plan (which includes Green Belt sites) performs worse environmentally than the previous submission. The Greenbelt sites in this Plan are mainly concentrated in just two areas of Sheffield (S35 and S12). It therefore follows that these two areas will be affected by this acknowledged worsening of the environment. According to the council's IIA the Main Modifications make the Plan worse for soil and land, landscape, biodiversity and transport. I suggest site NES37 be removed to avoid these issues.

Change Sought: The inclusion of Green Belt is not justified as it is not supported by evidence to prove its need. Green Belt can only be released if no other land is available. There are brownfield sites available. The council have not carried out their required yearly updates of brownfield sites and are working from HELAA (2023). An updated community version (Community Brownfield Sites List - Exam 141) has been submitted to the Sheffield Local Plan website.

In conclusion, I request that site **NES37** be removed from the list of allocated sites and retained as protected Green Belt land.

REF5.0259

Site NWS31 main modifications document MM332

From [REDACTED]
Date Sun 2026-05-03 8:57 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

To whom it may concern

I wish to object to the modifications now made to the council decision to remove this site from green belt status and offer it for housing development.

On a personal basis and considering my neighbours and the whole community of Wharncliffe Side this issue is unnecessarily causing so much harm already to the wellbeing and mental health of all of us. The threat of losing our green space, our playground, our beautiful site of biodiversity, a buffer zone for the next door ancient woodland of Glen Howe and its own wildlife is immoral and unnecessary.

I quote King Charles in a recent speech

"Safeguard nature our most precious and irreplaceable asset" and a potential labour councillor who asks " why public consultation wasn't done at long list stage" and states that the site has "huge value as a social and community space" Plus, I see no plans for improvement and increase of infrastructure, while 3 further housing sites are being developed in nearby Deepcar.

I would also ask why is this development of merely 100 homes necessary (might I say these will not be the type of homes REALLY needed to meet any immediate housing shortage) when recent ONS data shows a potential DECREASE in population growth, and with fewer overseas students there will now be more city centre accommodation available, plus more BROWNfield are becoming available and MUST be used first.

Surely this thinking and activity makes this proposal unsound and morally illegal.

I wish to object to modification

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

There has been limited opportunity for residents to make representations regarding this, and as a resident this frightens me.

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 already congestion on Dixon Drive and the Brightholmlee Lane junction to Main Road. (Note 3 further developments in Deepcar potentially feeding more vehicles along the main road making the junction more dangerous.
- 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 will 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, although this is a minor road and only one way so, actually it isn't feasible

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

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

Please note that my granddaughter, who lives on the other side of this field from me, spends many days with me, will use this field for safe access, and will be a pupil at the local school, and myself are both affected by Protected Characteristics

2 - 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 floodplain, 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.

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.

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.**

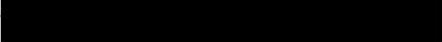
Basically I object to the council removing this area from green belt status, and offering it for housing development and I trust that you will listen to all of the residents of Wharncliffe Side

Yours sincerely
Karen Riley

Sent from my iPhone

REF5.0260

Response to Main Modifications NES37 (MM-351)


From 
Date Sun 2026-05-03 8:59 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Sheffield Local Plan

Response to Main Modifications

D Cocker


May 3, 2026

Modification Reference: MM-351 (Site NES37 – Land between Creswick Avenue and Yew Lane, S35 8QN)

I object to the allocation of site NES37 because it is **unsound and not legally compliant**. The council has failed to demonstrate the 'Exceptional Circumstances' required by the NPPF for Green Belt release.

- 1. Green Belt Purpose:** The development would result in significant urban sprawl, physically merging the distinct communities of Grenoside, Ecclesfield, and Parson Cross. Golden Rules must apply, including delivering 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 proposed alternative to this green space is for residents to use Grenoside Woods instead. This is not a suitable alternative for many residents due to distance, steep hills and safety (ie woodlands are **not** safe, open spaces for everyone). Green Belt should only be used for development when a local need is proven. No local need has been proven for housing, secondary school education, or for a multi-faith burial ground. If any sections of the site are found to not be required, this could result in the site not needing to be removed from the Green Belt as the Golden Rules will not be met. NES37 should therefore be removed from the Plan.
- 2. Loss of Working Farm:** NES37 is a productive, tenanted working farm. Its development contradicts national policy to protect agricultural land and support food security. Because of legal implications relating to the tenancy of this Sheffield City Council owned site, NES37 is not guaranteed to be available for the Plan and should therefore not be included. Inclusion of this site could be detrimental to the whole of the Sheffield Local Plan if it is later deemed to be undeliverable.
- 3. Sustainability:** The removal of this green space will have a detrimental impact on the physical and mental wellbeing of local residents and biodiversity, which has not been adequately mitigated by the proposed changes.

4. **Environmental & Ecological Impact:** The development would destroy irreplaceable habitats, mature and ancient trees and hedges and wildlife corridors. Insufficient assessments have been undertaken to fully realise the impact that development will have on this site. These assessments should be done **before** the site is included in the plan.
5. **Infrastructure Capacity:** Local pre-schools, primary schools, GP and dental surgeries will be overwhelmed by the inclusion of this site. These services are struggling at present and are unable to take on more pupils and patients. Local GP surgeries have no physical room for expansion. Traffic congestion and air pollution are a major factor; there is physically no room to widen roads around site NES37, and no mitigation plans. Bus services do not operate on Wheel Lane, The Wheel or Town End Road due to the very narrow 'pinch-points' along this route. This will lead to the creation of car-dependent housing, in contradiction of climate goals.
6. **Landscape/Character:** The inclusion of site NES37 will destroy the semi-rural character of the area. The merging of three distinct areas will result in the loss of a beautiful, well-loved and well-used large green space and the loss of identity. Both Grenoside and Ecclesfield are ancient areas and the local history will be impacted severely. "This site is identified as containing historical landscape characteristics, an area of known archaeological interest and contributes to the setting of nearby Heritage Assets." Ecclesfield is one of the oldest areas in the north of Sheffield and has a Grade I Listed church. There are the remains of medieval strip fields on Town End Farm, of which no mention of protection is indicated.
7. **Accumulative Assessment:** Site NES37 is in close proximity to several other sites which are planned for housing development. Site NES39 is directly opposite, sites NES38 and CH05 are close by. There are also three industrial/warehousing development sites nearby; NES36, CH03 and CH04. No accumulative assessment for these 7 sites in S35 has been undertaken. No mitigation measures regarding increased traffic volumes in Ecclesfield and Grenoside, including LGVs and HGVs have been offered. These roads form part of a major route across Sheffield and already operate at high capacity. Accumulative assessment has also not been undertaken with regard to health care services.
8. **Integrated Impact Assessment:** The council's own IAA states that the modified Plan (which includes Green Belt sites) performs worse environmentally than the previous submission. The Greenbelt sites in this Plan are mainly concentrated in just two areas of Sheffield (S35 and S12). It therefore follows that these two areas will be affected by this acknowledged worsening of the environment. According to the council's IIA the Main Modifications make the Plan worse for soil and land, landscape, biodiversity and transport. I suggest site NES37 be removed to avoid these issues.

Change Sought: The inclusion of Green Belt is not justified as it is not supported by evidence to prove its need. Green Belt can only be released if no other land is available. There are brownfield sites available. The council have not carried out their required yearly updates of brownfield sites and are working from HELAA (2023). An updated community version (Community Brownfield Sites List - Exam 141) has been submitted to the Sheffield Local Plan website.

In conclusion, I request that site **NES37** be removed from the list of allocated sites and retained as protected Green Belt land.

REF5.0261

objection

From [REDACTED]
Date Sun 2026-05-03 9:38 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

To whom it may concern

I consider Main Modification MM411 (site SES30) and MM410 (site SES29) to be unsound. It is not justified and not consistent with national policy. I request that SES30 and SES29 be removed from the Plan and retained as Green Belt.

Joanne Currie

Sent via BT Email App

REF5.0262

Modifications Reference MM353

From [REDACTED]
Date Sun 2026-05-03 9:57 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Comments on Main Modifications Consultation Reference MM353 - Sheffield Plan Site Ref. NES39

1. Wildlife Protection

Under environmental laws several “high risk” species are protected. Parcel A of Site NES39, has recently been inspected and the following species have been found - Bats - Reptiles (adders and grass snakes) - Badgers as well as Birds of Prey, and Foxes.

2. No Justification for Development of Parcel A

Site NES39 has been split into three parcels - A, B and C, and is situated to the north of Wheel Lane, Grenoside.

Parcel A comprises approximately half of the site area and B plus C comprise the remaining half.

The Inspectors reported that -

- They felt that Parcels B and C (as shown on SCC map (EXAM 180)) are particularly attractive and stated that development could not be justified or appropriate on these sections of the site”.

Parcel A should be included in this decision - for the same reason.

The Inspectors were correct when they recommended not to build on parcels B or C “as they make a strong contribution to the character and setting of the local area”.

However, these comments made regarding Parcels B and C are equally valid for Parcel A.

They also stated that “development would cause significant landscape and visual harm”.

It is the whole of site NES39, i.e., Parcels A, B and C, which are extremely attractive and withdrawing the greenbelt status cannot be justified.

The particularly attractive views across “open fields, sloping down to a river valley, with views to the open countryside beyond” don’t just start at the beginning of Parcel B or C (which are approximately halfway down site NES39, opposite the junction with Creswick Lane) - these views begin at Parcel A.

This beautiful view becomes visible across the “well cared for” pastures of Parcel A. It is an integral part of the whole vista and to allow building here would diminish the view across Parcels B and C to the undulating fields ahead. The view across all three Parcels is irreplaceable.

This is a much loved and valued view - and to build on Parcel A, as well as B and C, would most definitely cause immense landscape and visual harm.

When brownfield sites are available across the city - I would ask that the plan to develop Parcel A is reconsidered and reversed before it is lost forever.

C Wall

Views across Parcel A




Views Across Parcel A would be lost if houses were built here.



REF5.0263

Wrong one - Use this one!

From [REDACTED]
Date Mon 2026-05-04 1:06 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

 1 attachment (6 MB)
SC_May4_.pdf;

External email

Dear planning team,

Please delete/remove my previous email (sent at exactly midnight) with attachment titled: ObjectionSC3 526.pdf - I realised after submitting that it was the incorrect version.

Please find attached my final formal representation on Main Modifications MM410 (SES29, Handsworth Hall Farm) and MM411 (SES30, Bramley Lane/Beaver Hill Road) as part of the current Sheffield Local Plan Main Modifications consultation.

I consider both modifications to be unsound on the grounds of health infrastructure deliverability, inadequacy of the Integrated Impact Assessment for these specific sites, absence of a site-specific equality impact assessment for S13, and a procedural concern regarding the timing of material evidence.

I wish to be kept updated, and can you please make sure this time you actually upload my representation to the database - as last time you failed to upload it.

Thanks a lot,

Sadie Charlton

Representation to the Planning Inspectors Sheffield Local Plan - Main Modifications Consultation

Submitted by: Sadie Charlton, S13 resident and NHS Occupational Therapist

**Modifications commented on: MM410 (SES29) and MM411 (SES30) Appendices: A - E
(listed at end of document)**

I am writing to submit a formal representation on Main Modifications MM410 and MM411, which propose the allocation of Handsworth Hall Farm (SES29, 870 homes) and Bramley Lane/Beaver Hill Road (SES30, 827 homes) for development in S13.

I consider both modifications to be unsound. They are not effective, not justified, and not consistent with national planning policy. My representation focuses specifically on health infrastructure, the adequacy of the Integrated Impact Assessment as it relates to these modifications, and a procedural concern about the timing of material evidence.

I am an NHS Occupational Therapist and a resident of S13. I work directly with some of the most vulnerable people in our communities. I am not a planning expert, I've found the whole process absolutely brain boggling and exhausting to keep up with. But I am someone who understands what it means when healthcare systems are already stretched, and I have spent considerable time reviewing the evidence base that underpins these modifications and trying to make sense of this. What I have found concerns me deeply, and I believe it should concern the Inspectors too.

1. The legal and policy framework

The National Planning Policy Framework sets out four tests of soundness at paragraph 35. A plan must be positively prepared, justified, effective, and consistent with national policy. My representation engages primarily with the effectiveness and justification tests.

Paragraph 20 of the NPPF requires local plans to make sufficient provision for community facilities, including health infrastructure. Paragraph 99 requires that planning policies and decisions ensure that new development can be served by adequate infrastructure. These are not aspirational statements. They are specific policy requirements against which the modifications must be assessed.

The Equality Act 2010, section 149, imposes a public sector equality duty on the council as decision-maker. It requires that due regard be had to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between people who share protected characteristics and those who do not. I return to this below in relation to the absence of a site-specific equality impact assessment for S13.

The Health and Social Care Act 2012 places a duty on Integrated Care Boards to have regard to the need to reduce inequalities in access to health services and in outcomes achieved. The ICB's own assessment, disclosed through a Freedom of Information request (Appendix A), demonstrates that existing services in S13 are already at or beyond capacity. That statutory duty requires a credible plan to address those inequalities, not a note that further planning is required.

2. The effectiveness test is not met- healthcare infrastructure is unconfirmed, unfunded, and not deliverable

The NPPF paragraph 35 requires plans to be effective- deliverable over the plan period. For MM410 and MM411 to meet this test, there must be a credible, funded, and deliverable healthcare infrastructure solution to serve the population growth they propose.

No such solution exists, as far as I am aware- and nobody appears to be able to offer any further information on this.

The evidence for this comes not from campaign materials but from the ICB's own documents, released in response to Freedom of Information request FOI 2526-103, responded to on 16 July 2025 (Appendix A).

For SES30, the ICB assessment (Appendix B) states that Woodhouse Surgery is at capacity and would require reconfiguration, and that Olive Lane Medical Centre (the primary proposed mitigation, within Rotherham) is expected to exceed capacity. The assessment concludes that "more detailed planning is required for solution to be determined."

For SES29, the same assessment states explicitly that "nearest sites not suitable" and that Olive Lane capacity is again expected to be exceeded, with "more detailed planning is required for solution to be determined in consideration of neighbouring Local Authority plans."

These are the ICB's own words. There is no confirmed solution. There is no funded solution. There is no deliverable solution within the plan period.

I would also draw the Inspectors' attention to the specific language used in the Infrastructure Delivery Plan addendum for both sites, which states that developer contributions "may be required" for healthcare. The word '**may**' is significant. It does not constitute a commitment, a mechanism, or a condition. It is an acknowledgment that

something might be needed at some point, which is not the same as demonstrating that infrastructure is deliverable alongside development as required by NPPF paragraph 99.

Neither MM410 nor MM411 contains a single condition requiring confirmed or funded healthcare provision before homes are occupied. There is no trigger, no timeline, and no mechanism to ensure that infrastructure keeps pace with development. This is a direct failure of the effectiveness test.

3. Additional evidence- correspondence with the Director of Public Health

In March 2025 I wrote formally to ██████████ Director of Public Health for Sheffield, raising concerns about the cumulative primary care impact of SES28, SES29, and SES30 and the absence of a confirmed healthcare solution. His response, dated April 2025, is included at Appendix E.

██████████ letter acknowledged that discussions between the ICB and the council regarding primary care planning remain ongoing, that funding mechanisms including the Community Infrastructure Levy and developer contributions have not yet been confirmed, and that some provision "may involve" new contracts or extensions rather than new facilities.

This correspondence is significant for two reasons. First, it confirms from the Director of Public Health himself, in writing, that no confirmed or funded healthcare solution has been identified for S13. This directly corroborates the ICB's own FOI evidence and undermines any suggestion that the infrastructure position is more advanced than the documentary evidence suggests. Second, ██████████ letter directs concern toward the Planning Inspectors and the IIA as the appropriate reassurance. Having now read the IIA addendum, I can confirm that it contains no cumulative primary care assessment for S13 and no site-specific engagement with the ICB's evidence of capacity constraints. The reassurance he points to does not contain what he says it contains.

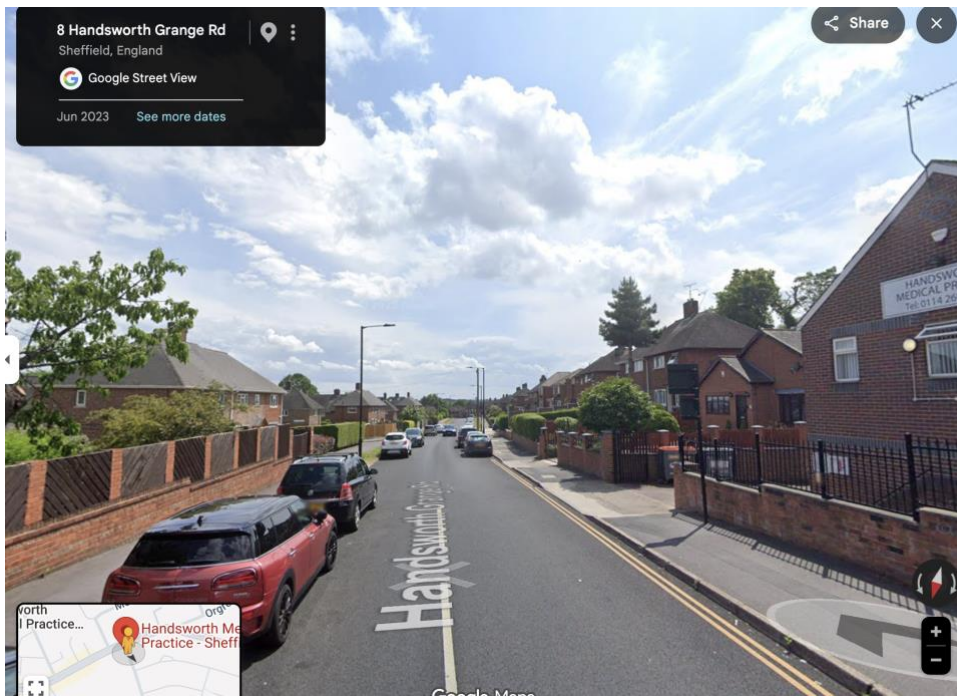
I raise this not to criticise ██████████ personally, but because the Inspectors should be aware that the Director of Public Health's own correspondence supports rather than contradicts the conclusion that healthcare infrastructure for these sites is unconfirmed and therefore emphasises concerns of deliverability within the plan period.

4. The proposed mitigation is not credible or physically deliverable

The Infrastructure Delivery Plan addendum identifies the mitigation for both sites as reconfiguration of existing GP surgeries, specifically the addition of two to three consultation rooms per practice.

The GP surgeries serving Handsworth are located in converted residential buildings directly adjacent to busy roads. They have no surrounding land available for extension. There is inadequate parking for current patient volumes, let alone the significant additional patient numbers that would result from these developments. There is no physical footprint available for the kind of expansion that would be required to add clinical rooms, waiting space, accessible facilities, and accommodate required staffing.





(Handsworth Medical practice – on the corner of Handsworth grange road and Handsworth road. It has double yellow lines currently as there is no available parking at the surgery – which is also on the same road as Ballifield primary school & Handsworth Grange school. Patients parking here frequently causes traffic issues effectively turning Handsworth grange road into a one way system. This will be further exacerbated when Handsworth grange road becomes a rat run to avoid Retford Road & beaver hill junction)





(Handsworth Medical Practice (Fitzalan branch site) – on handsworth road, no available parking and footprint right on the corner. How has the building been assessed to be physically expanded?)





(Woodhouse medical centre – the building to the left. The building to the right is not part of the GP surgery. Woodhouse does have parking, but it is mainly taken by staff who work at the surgery. The parking surrounding the surgery now is often chaotic and causes disruption to local residents who live there. If this is the primary GP catchment for SES30 you can only assume that many patients would rely on cars to access this surgery due to the location)

The IDP addendum states that reconfiguration is required but does not demonstrate that it is physically achievable at these specific premises. Asserting that existing surgeries can be expanded is not evidence that they can be. For the plan to be sound, mitigation must be credible and deliverable, not assumed.

I would ask the Inspectors to please give our community reassurances by requiring evidence that the proposed physical expansion of these specific premises has been assessed for feasibility, including building surveys, land availability, and planning constraints. In the absence of that evidence, the mitigation cannot be considered credible and the modifications cannot be considered effective.

5. The cumulative impact on primary care has not been assessed, and patient yield figures are likely to be underestimates

SES28, SES29, and SES30, alongside smaller adjacent allocations, together represent over 2,000 new homes in S13, generating an estimated 4,500 to 5,000 additional residents who will draw on the same local GP catchment.

The ICB's own methodology, set out in Appendix 13 of the FOI response (Appendix C), states that for developments generating over 6,000 new residents, a new GP premises will be required. The combined patient yield of SES29 and SES30 alone is assessed at 3,997 patients (Appendix D). When SES28 and smaller adjacent sites are included, this figure approaches and potentially exceeds that threshold. However, because each site has been assessed individually rather than cumulatively, that threshold is never triggered. No new GP premises has been identified as required. No new facility has been planned, funded, or committed.

I raised this point at the examination hearings. The Inspector at that session asked the council's representative directly whether this had been explored. No satisfactory answer was provided, and nothing in MM410, MM411, or the IIA addendum addresses this gap.

The IIA addendum claims to have integrated a health impact assessment for these modifications. But there is no cumulative primary care assessment for S13 anywhere in that document. The health assessment for the Handsworth strategic location amounts to a few short paragraphs, notes that the sites are within walkable distance of GP services, and predicts a moderate positive health effect. It does not reference the ICB's own evidence of existing capacity constraints. It does not assess the combined impact of SES28, SES29, and SES30 on the same local services. It does not engage with the ICB's own methodology for when new premises are required.

A further concern relates to the occupancy assumptions underpinning the patient yield calculations. The ICB's methodology applies a standard rate of 2.3 residents per dwelling for developments outside the city centre (Appendix C). However, SES29 and SES30 are large greenfield family housing sites. National guidance and Census 2021 data indicate that family-sized homes on suburban and greenfield sites typically generate occupancy rates of 2.4 to 3.0 or above, particularly where the housing mix emphasises affordable or social housing. If the occupancy rate applied is lower than the site-specific rate appropriate to these developments, the patient yield figures of approximately 2,001 for SES29 and 1,996 for SES30 (Appendix D) are likely to be underestimates. This would mean that the room calculations derived from those figures are also underestimates, and that the proposed mitigation (already shown to highlight the issues with physical deliverability) may be numerically insufficient even on its own terms. The ICB's assessment does not appear to have applied a site-specific occupancy rate or to have justified the use of the standard 2.3 multiplier for greenfield family housing of this scale.

This is not a matter of interpretation. It is a gap. The cumulative assessment that the ICB's own methodology indicates is necessary for a development of this combined scale has simply not been undertaken. That failure is embedded in the IIA addendum that this consultation asks the Inspectors to consider, and I would please ask the inspectors to consider if it is sufficient reason to find both modifications unjustified and not effective.

6. The IIA's health and wellbeing assessment for Handsworth is not supported by evidence

The IIA addendum predicts that the modifications will increase the significance of health effects from moderate to potentially major positive (paragraph 5.5.8). This conclusion is not supported by the site-specific evidence available for S13. I would ask the Inspectors to consider the following specific inadequacies in that assessment.

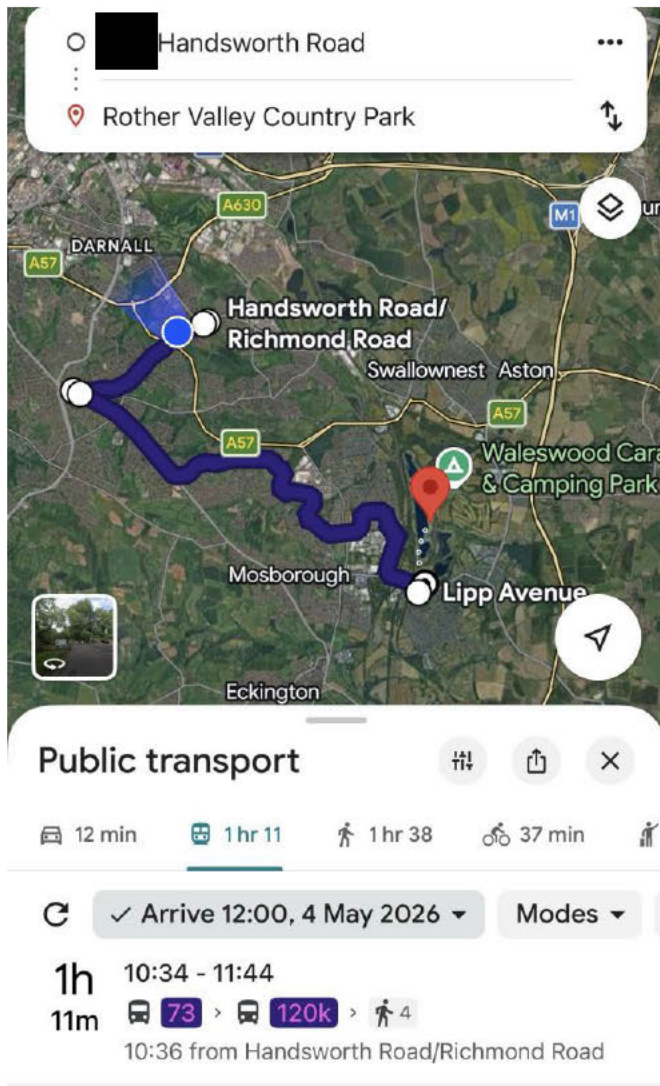
The health and wellbeing assessment for the Handsworth strategic location predicts a moderate positive effect on the basis that the sites are within walkable distance of GP services and in proximity to open spaces. This assessment is inadequate in three specific respects.

First, proximity to GP services is not the same as access to GP services. The ICB's own evidence confirms that local practices are already at or beyond capacity and that no solution has been determined. The IIA does not reference this evidence anywhere in its health assessment for this location.

Second, the open spaces cited as contributing to the positive health prediction include the green belt land proposed for development. The assessment effectively counts the thing being removed as a reason why its removal will not cause harm. The IIA addendum itself acknowledges at paragraph 5.5.2 that the loss of this green and open space will have negative effects on mental health and wellbeing. That acknowledgment is made in a single sentence and then set aside without any analysis of scale, duration, who is most affected, or what mitigation is proposed.

Third, Rother Valley Country Park, cited as a compensatory green space resource, is located in a different local authority area. It does not serve the same function as the accessible everyday green space that these allocations would permanently remove, particularly for elderly residents, disabled people, and those without access to private transport who rely on local accessible open space for daily mobility and wellbeing.

For local residents who don't have access to a car, they would need to get 2 buses and travel for 1 hour 10 minutes to visit Rother valley country park. This surely cannot be compensatory for the loss of our daily accessible green space.



Paragraph 5.5.6 of the IIA addendum further states that Policies CA1, CA3, and CA5 provide greater detail on localised needs for healthcare facilities and will help address health inequalities. However (Unless I am dumb and can't find these policies buried within all the technical documents and uploads) it appears CA1 relates to Kelham and Neepsend, CA3 to St Vincent's and the Cathedral area, and CA5 to Heart of the City and The Moor. These are city centre character area policies with no geographic application to S13 or the Handsworth strategic location. Citing them as evidence that healthcare access will improve for communities affected by MM410 and MM411 is not accurate. There are no equivalent localised healthcare policies in the modifications that relate specifically to S13. This further demonstrates that the IIA's prediction of major positive health effects from these modifications is not supported by evidence specific to the communities most affected by them.

7. Material evidence was not available during consultation

The FOI response reveals a timeline the Inspectors should be aware of.

Arup first contacted the ICB regarding primary care requirements for the additional greenfield sites on 6 March 2025. They chased responses on 1 May, 12 May, 14 May, and 19 May 2025. An Arup email dated 14 May 2025 states explicitly that if the ICB does not respond, the IDP addendum will simply record that detailed information from the ICB could not be obtained. The ICB provided its assessment on 19 May 2025. Public consultation on the new sites opened on 29 May 2025. All of this correspondence is included at Appendices A and B.

The health infrastructure assessment for SES29 and SES30 was therefore finalised ten days before consultation opened, assembled under acknowledged time pressure, with the ICB manually gathering data because its own Primary Care Network plans had not been finalised. An internal ICB email confirms that the 16 PCN plans expected to underpin the assessment had been delayed, requiring manual data collection instead.

This is a procedural concern. The material evidence about primary care capacity constraints for these specific sites- including the explicit ICB statements that no solution has yet been determined- was not available in a form that allowed proper public scrutiny during the consultation period. It was only accessible through a Freedom of Information request submitted after the original consultation deadline had passed.

I would ask the Inspectors to satisfy themselves that the examination has been conducted on the basis of complete and properly disclosed information in relation to healthcare infrastructure for SES29 and SES30, and that consultees had a genuine opportunity to engage with the material evidence that now exists.

8. There is no site-specific equality impact assessment for S13

The IIA addendum states at paragraph 1.2.2 that it integrates the Equality Impact Assessment process. Under the Equality Act 2010 section 149, the council as decision-maker is required to have due regard to the impact on people with protected characteristics when making decisions of this kind.

Having read the IIA addendum in full, there is no site-specific equality impact assessment for S13, SES29, or SES30. The equality conclusions in the addendum are drawn at whole-plan level.

Paragraph 5.5.2 of the IIA addendum asserts that groups with protected characteristics including age, race, and poverty are most likely to see benefits from the modifications, primarily through the delivery of affordable housing. I would ask the Inspectors to consider what evidence underpins this assertion specifically in relation to S13, because the available evidence points in the opposite direction on each of the three grounds cited.

On poverty: the primary stated benefit is affordable housing delivery. The IIA's own assessment of the Handsworth strategic location acknowledges that low land values and higher residual costs associated with remediation and infrastructure present a barrier to achieving higher development standards. This concern is compounded by the significant physical constraints acknowledged within MM410 and MM411 themselves. MM410 requires a Coal Mining Risk Assessment, flood risk mitigation, a minimum 15m ecological buffer to adjacent wildlife sites, and an archaeological evaluation before development can proceed. MM411 similarly requires a 15m buffer to Smelter Wood and Shirtcliffe Valley Grasslands, protection of hedgerows and watercourses, and coal mining risk assessment. Each of these constraints reduces the net developable area of the sites and adds to remediation and construction costs. If viability is constrained by these factors, the delivery of affordable housing at the levels required to genuinely benefit those experiencing poverty cannot be assumed. The IIA's prediction that poverty as a protected characteristic will benefit from these modifications is therefore not supported by the evidence base for these specific sites. The assertion that affordable housing delivery will benefit those experiencing poverty therefore rests on a viability position that the IIA and evidence presented during the consultation process flags as uncertain for this specific location.

The relationship between poverty and poor health is well established. People living in deprivation experience higher rates of chronic illness, mental ill health, and complex long-term conditions, and are therefore disproportionately reliant on primary care services. S13 is already an area of above average deprivation with known higher rates of health need. Adding thousands of residents to a GP system that the ICB itself has confirmed is already at or beyond capacity, without a confirmed solution, will deepen the pressure on services that the most vulnerable members of this community depend on most. The people least able to wait, least able to travel further, and least able to manage without timely access to a GP are those already experiencing poverty and poor health. This plan as modified does not reduce that inequality. It compounds it.

On age: elderly residents in S13 disproportionately rely on accessible local green space for daily mobility, social connection, and mental health. The IIA addendum acknowledges at paragraph 5.5.2 that the loss of green belt land will have negative effects on mental health and wellbeing. Elderly people with limited mobility who cannot travel to alternative green spaces further afield are precisely the group most affected by that loss. They are a protected characteristic group. The IIA predicts they will benefit from these modifications. The evidence suggests the opposite for this specific community.

Handsworth currently has no community leisure centre, no swimming facilities, no library or community hub, no out of hours pharmacy, and no sixth form provision. These are not planning abstractions. They are structural inequalities experienced daily by residents across every protected characteristic group in this postcode. A plan that

delivers housing without delivering the community infrastructure that would genuinely address those inequalities is not a plan that reduces inequality. It is a plan that adds population to an already underserved area and calls it progress.

The assertion that the modifications are unlikely to bring about discrimination on any groups and will have positive impacts overall for protected characteristics is not supported by evidence specific to S13. It is a generalisation drawn from a whole-plan equality assessment that has not engaged with the particular circumstances of the community most significantly affected by these modifications. That is not sufficient to discharge the duty under section 149 of the Equality Act 2010 in relation to MM410 and MM411 specifically.

A generic city-wide equality assessment does not satisfy the section 149 duty in relation to a site-specific decision that concentrates the largest housing allocations in the entire plan within a single deprived postcode. I ask, can the Inspectors be satisfied that due regard has been had to protected characteristics in relation to MM410 and MM411 specifically?, because no such assessment has been carried out for S13 specifically.

9. What sound planning for S13 would actually look like

I want to be honest with the Inspectors about what I believe this community needs, because nothing in MM410 or MM411 meaningfully addresses it.

S13 currently has no community leisure centre, no swimming pool, and no sixth form provision or alternative SEN provision. Young people who want to continue their education beyond GCSE must travel across the city. Families who want their children to learn to swim must travel into the city centre or up to springs which is over an hour walk away. Handsworth does not have a library, a community or family hub, accessible well-maintained council parks. These are not minor inconveniences. They are structural inequalities that have existed for years and that this plan does nothing to address. If we had these facilities within a local plan – our community would be healthier and in a better position to absorb more housing in small plots rather than strategic developments which wipe our only accessible green space. Our community would be a desirable place to live if we had the community infrastructure and facilities. We are already under-invested as a community, and now we are being told to absorb more housing without the guarantee of being able to access the basic infrastructure such as health and schooling.

The Golden Rules require compensatory improvements to the remaining green belt. They do not require compensatory improvements to community infrastructure that maintains health and wellbeing more holistically. A community that is being asked to absorb the largest housing allocations in the entire Sheffield Local Plan deserves more than vague commitments to future developer contributions that may or may not materialise.

The IIA addendum acknowledges at paragraph 5.5.2 that the loss of green belt land at these sites will have negative effects on mental health and wellbeing. That acknowledgment is made in a single sentence and then set aside. There is no analysis of what that means specifically for S13, no consideration of the fact that this green belt is not supplementary amenity but the primary accessible natural space for a large deprived urban community, and no assessment of what the cumulative loss of SES29 and SES30 together means for a population that has no alternative provision.

10. What I am asking the Inspectors to consider..

If the health infrastructure evidence fails to demonstrate that modifications **MM410** and **MM411** are deliverable alongside adequate healthcare provision, I ask the Inspectors to find these modifications unsound. Specifically, they fail the ‘effectiveness’ test under NPPF paragraph 35, as they are not justified by proportionate evidence and cannot be proven deliverable over the plan period.

Should the Inspectors be minded to find these modifications sound in principle, I request that the policy text be further modified to replace the current, ambiguous phrase "**may be required**" with mandatory, binding requirements. To meet the effectiveness test, the policy must explicitly state that confirmed, funded, and physically deliverable primary care provision must be in place prior to the occupation of any dwellings on either site.

Furthermore, to ensure the plan is based on a robust evidence base, I ask the Inspectors to require the following before the plan is found sound:

- **A Comprehensive Cumulative Health Impact Assessment:** This must cover SES28, SES29, and SES30 combined. Crucially, this assessment should utilize site-specific occupancy rates appropriate for greenfield family housing, rather than relying on city-wide averages which understate real-world demand.
- **Feasibility Evidence:** Concrete evidence must be provided to prove that the proposed physical expansion of existing GP surgeries serving the S13 area is actually feasible and deliverable.
- **Equality Impact Assessment:** I ask the Inspectors to consider whether the absence of a site-specific Equality Impact Assessment for S13 constitutes a failure by the Council to discharge its Public Sector Equality Duty under Section 149 of the Equality Act 2010.

Without these essential safeguards, the plan as modified will be fundamentally flawed. It risks delivering thousands of homes into a healthcare system that the ICB itself admits has no confirmed solution, and onto land that serves as the last remaining natural space for a large, deprived, and currently underserved urban population.

Thank you for your time reading this,

Sincerely,

Sadie Charlton

S13 resident and NHS OT

Appendices submitted with this representation

Appendix A — Freedom of Information response, NHS South Yorkshire ICB, FOI 2526-103, dated 16 July 2025, including covering letter and full correspondence chain between Arup and the ICB from March to May 2025

Appendix B — ICB Primary Care Assessment summary for SES29 and SES30 (Appendix 8a of FOI response)

Appendix C — ICB Primary Care Assessment methodology and assumptions (Appendix 13 of FOI response)

Appendix D — ICB detailed site assessment spreadsheet showing patient yield figures for SES29 and SES30

Appendix E — Correspondence between Sadie Charlton and Dr Greg Fell, Director of Public Health for Sheffield, March to April 2025



Our Ref : FOI 2526-103

Date: 16 July 2025

Dear Enquirer

Re: Freedom of Information Request

Thank you for your recent request for information under the Freedom of Information Act 2000 received on 23 June 2025. Please see below your original questions, followed by our responses in the table below.

I am writing to make a request under the Freedom of Information Act 2000 regarding the involvement of Sheffield Integrated Care Board (ICB) in the evidence base for Sheffield City Council's updated Infrastructure Delivery Plan (May 2025), specifically relating to:

- **Site SES30** – Land between Bramley Lane and Beaver Hill Road, S13
- **Site SES29** – Handsworth Hall Farm, Land at Finchwell Road, S13

These sites are proposed for development in the Sheffield Local Plan and are referenced in the Infrastructure Delivery Plan Addendum (May 2025), which attributes healthcare infrastructure recommendations (e.g. additional GP consultation rooms) to discussions with the ICB.

Please provide the following information:

1. **Any and all correspondence** (emails, letters, meeting requests or summaries) between Sheffield ICB and either:

- Arup (authors of the Infrastructure Delivery Plan), and/or
- Sheffield City Council

regarding healthcare provision, capacity, or infrastructure needs for SES29, SES30, or any developments proposed in the Handsworth/Southeast Sheffield area.

2. **Any documents or reports produced by or shared with Sheffield ICB** that assess the primary care impact of the proposed developments at SES29 and SES30.

3. **Any meeting notes, minutes, or briefing materials** held by Sheffield ICB that discuss the capacity of GP practices or healthcare infrastructure in the vicinity of SES29 and SES30.
4. The **methodology and/or assumptions used to calculate the estimated patient yield** (e.g. 2.3 patients per dwelling) and the resulting need for “2–3 additional consultation rooms” per site. This includes any reference documents or internal models used to derive these estimates.
5. Any information held regarding **potential mitigation plans, developer contributions, or known capacity constraints** related to serving the population growth from these developments.

Response

Date	Type	Detail	Attachments
06/03/25	Email	Email from Arup to confirm additional work required for IDP and request for meeting	Appendix 1
18/03/25	Meeting	Meeting hosted by Arup to outline plan and discuss actions for ICB Attendees Rob Webster – Arup Hanna Toth – SCC Helen Briggs – ICB Mike Speakman – ICB Megan Mulligan – Arup	
19/03/25	Email	Meeting follow up including data and actions for ICB.	Appendix 2-3
01/05/25	Email	Email from Arup seeking progress.	Appendix 4
12/05/25	Email	Email chaser.	Appendix 5
14/05/25	Email	Email chaser and annual leave notification.	Appendix 6
19/05/25	Email	Arup follow-up email	Appendix 7
19/05/25	Email	ICB response	Appendix 8-9
19/05/25	Email	Arup clarification points.	Appendix 10
19/05/25	Email	ICB data confirmation.	Appendix 11-12
	Document	Assessment of Primary Care Capacity	Appendix 13

Please note Spreadsheets have been amended to only include detail of requested sites

Section 43 (2) – Commercial Interests

Please note we have redacted all names and email addresses from the emails listed above as we are of the opinion that this information is commercially sensitive and is exempted under Section 43(2) of the Freedom of Information Act 2000 as the release of this highly sensitive information is likely to prejudice the commercial interests of NHS South Yorkshire ICB, specifically the ability to reduce or maintain the cost of providing this service to the patients of South Yorkshire at a time of great financial challenge for the NHS.

Referring to the ICO guidance: [Section 43 - Commercial interests | ICO](#). Section 43(2) exempts information whose disclosure would, or would be likely to, prejudice the commercial interests of any person (an individual, a company, the public authority itself or any other legal entity).

If you are dissatisfied with this response you can request an internal review by writing to our Director of Corporate Governance at syicb-sheffield.icbcomplaints@nhs.net within 40 working days. It would be helpful if you could quote our reference number in any communications.

If you are still not content with the outcome of the internal review, with regards to this Freedom of Information request, you have the right to appeal to the Information Commissioner's Office (ICO). You should make complaints to the ICO within six weeks of receiving the outcome of an internal review. The Information Commissioner will not investigate your case unless you have exhausted our complaints procedure. The Information Commissioner can be contacted at: The Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. See www.ico.org.uk/foicomplaints for more information.

Yours sincerely

Business Support Officer
Freedom of Information

APPENDIX 1

From:
Sent: 06 March 2025 09:44
To:
Cc:
Subject: Sheffield IDP updates

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Hi all,

I hope you are well.

We're commencing work on an addendum to the Infrastructure Delivery Plan, to articulate the infrastructure implications of further growth to meet the Inspectors' ask to allocate an additional 3,500 dwellings and an additional 53 hectares of employment land.

We're doing this in two stages:

- Consideration of general infrastructure implications from further growth in different parts of the City (plus any changes of circumstance over the couple of years since the last updates to the IDP), to inform the selection of additional sites
- Once additional sites are selected, an addendum to the existing infrastructure schedule to set out the specific additional infrastructure requirements

To help with this – particularly the first of these two stages – would it be possible to arrange a meeting with you regarding primary healthcare provision in the next couple of weeks?

If you could send me and my colleague your availability, that would be much appreciated.

Kind regards,

Arup

[arup.com](#)

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APPENDIX 2

From:
Sent: 19 March 2025 13:43
To:
Cc:
Subject: Sheffield IDP - Follow-up actions
Attachments: 2025 02 13 Green Belt site options for Members - CitywideMap.pdf; 2025 02 13 Green Belt sites - for Members - site summary information .xlsx

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Hi All,

Thank you for your time on the meeting yesterday.

As discussed, please find attached the details of the additional sites currently under consideration and a map showing the location of these. This is currently confidential information at this stage. This is a longlist of sites, and not all will be selected for inclusion in the Local Plan – the Inspectors have asked the Council to identify around 3,500 additional dwellings in total.

Please can you provide your view on what development of these sites means in terms of existing facilities and what options are available to accommodate this growth. Please can you provide this for:

1. If all sites in each of the main clusters (around Chapeltown, and around the South East of the city) were developed
2. If half of the sites were developed in each of the main clusters

The additional actions I noted for you were to:

- Provide us a list of all schemes for primary healthcare improvement which are currently underway / will commence soon
- Provide us with the relevant parts from the South Yorkshire Primary Care Infrastructure Plan

Please let us know if you have any questions regarding this.

Kind regards,

Arup

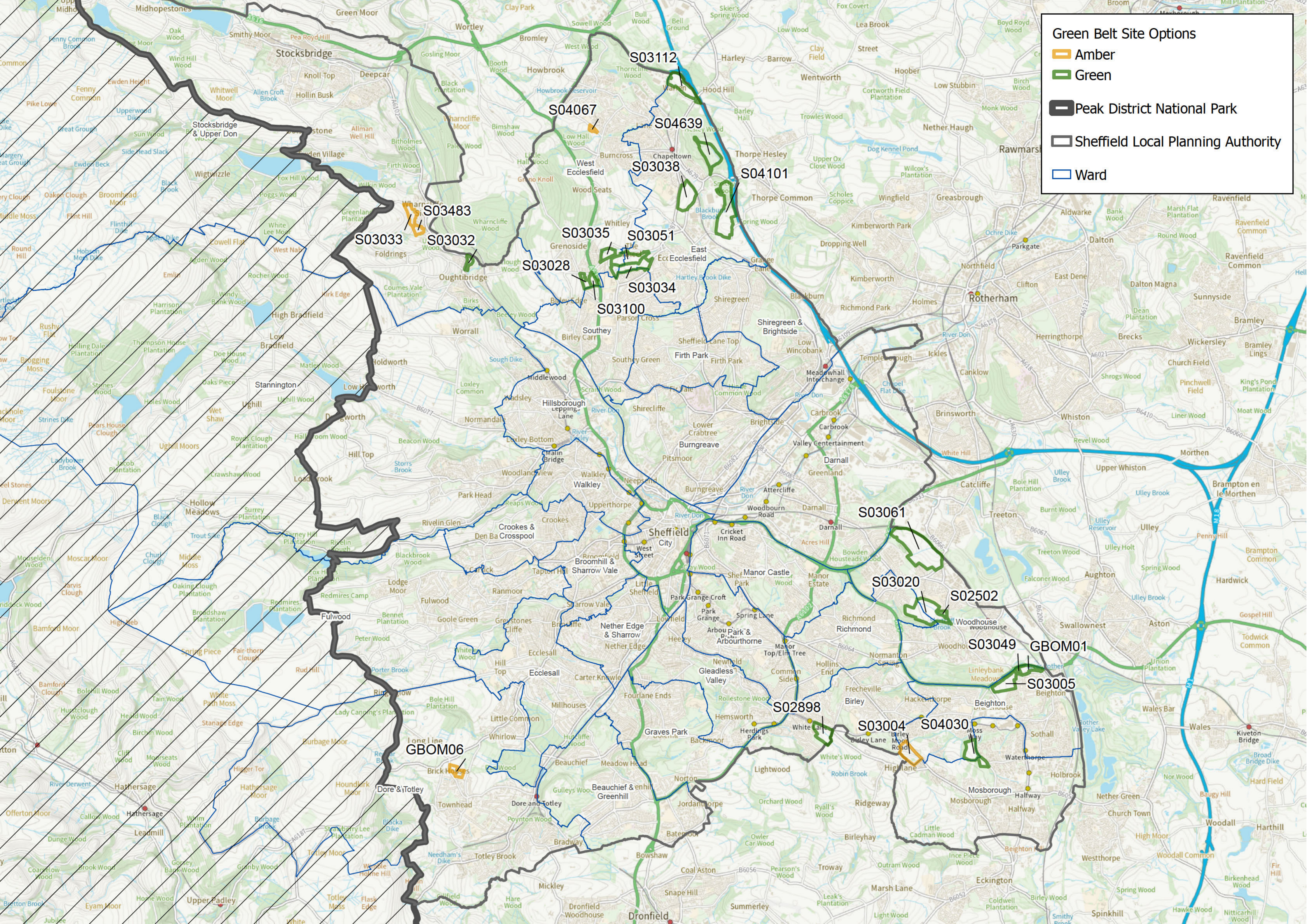


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Green Belt Site Options

- Amber
- Green

Peak District National Park

Sheffield Local Planning Authority

Ward

Site ref	Address	Ward	Sub Area	Gross Area (Ha)	Employment Net (Ha)	Housing Gross (Ha)	Housing Net (Ha)	Proposed Use	Estimated housing capacity (to 2039)
Housing site options									
GBOM01	Land to the north of Woodhouse Lane, S20 1AF	Beighton Ward	South East Sheffield	6.44	0	4.87	4.38	Housing	153
GBOM06	Land to the north of Parkers Lane, S17 3DP	Dore & Totley Ward	South West Sheffield	5.29	0	2.61	2.35	Housing	82
S02898*	Land to the south of White Lane, S12 3HS	Birley Ward	South Sheffield	13.41	0	12.3	8.61	Housing	344
S03004	Land to the west of Moor Valley, S20 5BB	Beighton Ward	South East Sheffield	13.92	0	10.55	7.39	Housing	296
S03020 and S02502	Land between Bramley Lane and Beaver Hill Road, S13 7JH // Land at Beaver Hill Road, S13 9QL	Woodhouse Ward	South East Sheffield	36.59	0	36.59	26.08	Housing	878
S03028	Land to the west of Grenoside Grange, Fox Hill Road, S35 8QS	West Ecclesfield Ward	North East Sheffield	4.62	0	4.41	3.97	Housing	139
S03032	Land at Forge Lane, S35 0GG	Stocksbridge & Upper Don Ward	North West Sheffield	3.18	0	2.56	2.3	Housing	69
S03033*	Land at Brightholmlee Lane, S35 0DD	Stocksbridge & Upper Don Ward	North West Sheffield	7.72	0	7.72	6.18	Housing	185
S03035	Land at Wheel Lane and Middleton Lane, S35 8PU	West Ecclesfield Ward	North East Sheffield	8.11	0	5.3	4.24	Housing	148
S03038	Land to the east of Chapelton Road, S35 9ZX	East Ecclesfield Ward	Chapelton /High Green	19.62	0	19.62	13.73	Housing	549
S03049	Land to the north of Beighton Road, S20 1AF	Beighton Ward	South East Sheffield	1.91	0	1.91	1.72	Housing	60
S03051 and S03034	Land to the south of Wheel Lane, S35 8RY // Land between Creswick Avenue and Yew Lane, S35 8QN	East Ecclesfield Ward	North East Sheffield	33.77	0	32	22.4	Housing	668
S03100	Holme Lane Farm, Halifax Road, S35 8PB	West Ecclesfield Ward	North East Sheffield	3.92	0	3.05	2.75	Housing	96
S03483	Land between Storth Lane and School Lane, S35 0DT	Stocksbridge & Upper Don Ward	North West Sheffield	4.84	0	3.8	3.42	Housing	103
S04030	Land to the west of Moss Way, S20 5AS	Mosborough Ward	South East Sheffield	27.9	0	14.59	10.21	Housing	357
S04067	Land at 266 Springwood Lane, S35 4JP	West Ecclesfield Ward	Chapelton /High Green	1.47	0	1.47	1.32	Housing	46
Mixed Use site option									
S03061	Handsworth Hall Farm, Land at Finchwell Road, S13 9AS	Woodhouse Ward	South East Sheffield	68.37	20	35.1	24.57	Mixed Use	770
Employment site options									
S03005	Land to the east of Eckington Way and south of A57, S20 1XE	Beighton Ward	South East Sheffield	13.98	13.98	0	0	Employment	0
S03112	Land bordered by M1, Thorncliffe Road, Warren Lane, and White Lane, S35 2YA	East Ecclesfield Ward	Chapelton /High Green	17.97	17.97	0	0	Employment	0
S04101	Land to the south of the M1 Motorway Junction 35, S35 1QP	East Ecclesfield Ward	North East Sheffield	35.63	22.02	0	0	Employment	0
S04639*	Hesley Wood, north of Cowley Hill, S35 2YH	East Ecclesfield Ward	Chapelton /High Green	18.23	14.12	0	0	Employment	0

* Availability to be confirmed.

Site ref	Address	Ward	Sub Area	Gross Area (Ha)	Employment Net (Ha)	Housing Gross (Ha)	Housing Net (Ha)	Proposed Use	Estimated housing capacity (to 2039)
Housing site options									
S03020 and S02502	Land between Bramley Lane and Beaver Hill Road, S13 7JH // Land at Beaver Hill Road, S13 9QL	Woodhouse Ward	South East Sheffield	36.59	0	36.59	26.08	Housing	878
Mixed Use site option									
S03061	Handsworth Hall Farm, Land at Finchwell Road, S13 9AS	Woodhouse Ward	South East Sheffield	68.37	20	35.1	24.57	Mixed Use	770
Employment site options									

* Availability to be confirmed.

APPENDIX 4

From:
Sent: 01 May 2025 11:00
To:
Subject: Sheffield IDP updates

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Following on from our meeting back in March, how are you progressing with the identification of specific primary healthcare requirements in response to the additional greenfield sites being included in Sheffield's Local Plan? For interest, the confirmed set of sites has now been agreed by SCC members:
<https://democracy.sheffield.gov.uk/documents/b30385/Item%2011%20-%20Sheffield%20Plan%20-%20Proposed%20Additional%20Site%20Allocations%20and%20Updates%20to%20the%20Evidence%20Base%20We.pdf?T=9>

We'll need to have any additional schemes identified by the end of next week in order to be included in an update to the IDP.

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Thanks

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APPENDIX 5

From:
Sent: 12 May 2025 09:03
To:
Subject: RE: Sheffield IDP updates

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Grateful if there's anything you can come back on this with ASAP. If there's likely to be a future need for developer contributions to fund healthcare from the additional sites, it would be really helpful to have had that identified at this stage.

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APPENDIX 6

From:
Sent: 14 May 2025 15:41
To:
Cc:
Subject: RE: Sheffield IDP updates

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From:
Sent: 19 May 2025 08:15
To:
Cc:
Subject: Re: Sheffield IDP updates

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Hi

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Kind regards,

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From:
Sent: 14 May 2025 4:10 PM
To:
Cc:

Subject: RE: Sheffield IDP updates

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You will have some content from the ICB by the end of the week.

Regards

NHS South Yorkshire Integrated Care Board
<https://southyorkshire.icb.nhs.uk/>

 Email:

NHS
South Yorkshire
Integrated Care Board



From:

Sent: 14 May 2025 15:41

To:

Cc:

Subject: RE: Sheffield IDP updates

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APPENDIX 8

From:
Sent: 19 May 2025 14:49
To:
Cc:
Subject: Re: Sheffield IDP updates
Attachments: Summary of responses to Local Plan proposed additional housing sites.docx

Hi please see attached a summary response that considered the implications of the additional 'greenfield sites being included in the IDP, from a health perspective. Please do not hesitate to contact me if you need further details - now the analysis has been done we can add any narrative quickly.

Kind regards

On 19 May 2025, at 08:14, wrote:

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Sent: 14 May 2025 4:10 PM

To:

Cc:

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Regards

NHS South Yorkshire Integrated Care Board

<https://southyorkshire.icb.nhs.uk/>

 **Email:**



**South Yorkshire
Integrated Care Board**



From:

Sent: 14 May 2025 15:41

To:

Cc:

Subject: RE: Sheffield IDP updates

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I'm on leave tomorrow and Friday – please could you send any response to my colleague [redacted], copied in. If we don't receive any response within the new few days, realistically the IDP addendum will have no choice but to say we were unable to obtain detailed information from the ICB. Public consultation on the new sites commences on 29 May, so we're already stretching the deadlines to get the document finalised in time.

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Sent: 12 May 2025 09:03

To:

Subject: RE: Sheffield IDP updates

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Thanks

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APPENDIX 8a

Summary of responses to Local Plan proposed additional housing sites

This document is provided by NHS South Yorkshire ICB in response to the proposed additional Greenfield sites where further housing units have been identified, and supplements the comments previously provided on the Sheffield IDP more specifically.

Whilst the needs of wider NHS health services have been considered, the dispersed nature of the proposed sites and scale relative to existing populations means the impact of such developments falls predominantly to Primary Care (General Practice) which by its very nature has a more local focus.

Wider secondary and community care is provided across a much larger population base already, on a city and locality basis, and whilst there is an impact of overall population growth, the requirements of such growth can be better managed through existing infrastructure and health planning processes. Similarly, community pharmacy and ophthalmic provision can be accommodated through normal planning processes and market conditions, without specific requirements being set out. Dental provision is outside the scope of this assessment.

The impact on General Practice is often seen on the practice or practices that are closest to a housing development. Some patients may choose to register further afield (e.g. nearer employment) or stay registered with their current practice if feasible. GP surgeries are in many cases already operating over their designed capacity, and changes to the scope and delivery of additional roles within General Practice have taken up what spare capacity may have existed. Further population growth locally can be expected to cause additional pressure on practices very quickly.

The nature and scale of the proposed additional 'greenfield' sites does produce some pressures not associated with infill developments – for some the scale of the development is more significant, and the closest existing practices are often smaller and can be disproportionately affected without suitable expansion.

Of particular note are the developments to the north-east (NES37/38/39) and south-east (SES29/30) of Sheffield. A new Primary Care hub is planned (SAPA2) which addresses current shortfalls in capacity and allows for some population growth in north-east Sheffield (S 8AU) – however, there is currently an issue with a fibre-optic cable that runs through the proposed site, that has prevented planned construction from commencing due to the unfunded cost of its relocation. If this scheme does not go ahead as planned, there will not be sufficient Primary Care capacity locally for the proposed housing developments, without other schemes being brought forwards.

To the south-east, the proposed SES29 site is very close to the local authority boundary with Rotherham MBC, and in particular to the recent Waverley development. As part of that development, a new GP premises (Olive Lane) has been created and is now open, however the planning assumptions for this facility did not take in to account the

developments now proposed on the Sheffield side of the boundary. Further, the SES30 proposed development is close to the current Woodhouse Surgery, which is at capacity currently but patients may register with the new practice in Waverley. There is therefore a risk that the new practice may not have capacity for the Sheffield residents, when considering further potential growth of the Waverley development. Further investigation into the assumptions of the neighbouring Rotherham MBC plans are therefore recommended before health planning requirements can be confirmed.

Assessment of proposed additional housing allocations - Primary Care

Site Reference	Postcode (near)	PCN(s)	Most relevant practice(s)	Other nearby Practices	Current Capacity Indicator	Homes	Patients	Impact	Notes / Requirement - Primary Care
SES30	S13 7JH	Townships 2	Woodhouse	Handsworth, Olive Lane		868	1996		Reconfigure Woodhouse / re-open Beighton HC. (+2/3 rooms required). Olive lane capacity expected to be exceeded
SES29	S13 9AS	Seven Hills	Olive Lane, Handsworth (M&B)	Darnall PCC, North Darnall		870	2001		Requires additional capacity, but nearest sites not suitable. Olive Lane capacity expected to be exceeded - more detailed planning is required for solution to be determined in consideration of neighbouring Local Authority plans

1738 3997

APPENDIX 10

From:
Sent: 19 May 2025 15:25
To:
Cc:
Subject: Re: Sheffield IDP updates

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Hi

Thanks for providing that response.

I just wanted to check that you are happy for us to include the detail in the spreadsheet in the infrastructure addendum - particularly the detail in the column "notes / requirement"? This will be added to the infrastructure schedule and published publicly.

Kind regards,

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From:
Sent: 19 May 2025 2:48 PM
To:
Cc:
Subject: Re: Sheffield IDP updates

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To:

Cc:

Subject: RE: Sheffield IDP updates

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Regards

NHS South Yorkshire Integrated Care Board
<https://southyorkshire.icb.nhs.uk/>

Email:



South Yorkshire Integrated Care Board



From:

Sent: 14 May 2025 15:41

To:

Cc:

Subject: RE: Sheffield IDP updates

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APPENDIX II

From:
Sent: 19 May 2025 16:23
To:
Cc:
Subject: Re: Sheffield IDP updates
Attachments: Assessment of additional Greenfield sites - IDP v2.xlsx

Hi , thanks for checking on what can be published. It may be better to not include the practice names in the published report, and I've added a column with a suggested report comment to be used rather than the detailed information. So suggest columns E, F & K are for internal reference only at this stage and not included.

Kind regards

On 19 May 2025, at 15:24, wrote:

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Hi

Thanks for providing that response.

I just wanted to check that you are happy for us to include the detail in the spreadsheet in the infrastructure addendum - particularly the detail in the column "notes / requirement"? This will be added to the infrastructure schedule and published publicly.

Kind regards,

Arup
One Centenary Way, Birmingham, B3 3AY
United Kingdom

arup.com

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From:
Sent: 19 May 2025 2:48 PM

To:
Cc:

Subject: Re: Sheffield IDP updates

Hi please see attached a summary response that considered the implications of the additional 'greenfield sites being included in the IDP, from a health perspective. Please do not hesitate to contact me if you need further details - now the analysis has been done we can add any narrative quickly.

Kind regards

On 19 May 2025, at 08:14,

> wrote:

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Hi

Hope you're well.

I'm conscious we didn't receive anything from you by the end of last week. Please can you send through your response as soon as possible today, by the end of today at the latest, to allow us to add this into the report.

As has already stated, if we don't receive a response from you, the IDP addendum will say we were unable to obtain detailed information from the ICB.

Kind regards,

Arup
One Centenary Way, Birmingham, B3 3AY
United Kingdom

arup.com

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From:
Sent: 14 May 2025 4:10 PM
To:
Cc:

Subject: RE: Sheffield IDP updates

Hi

Apologies for the delay in responding. As per our last meeting, we did expect our 16 PCN Plans to be finalised to identify the needs but unfortunately these have been delayed which has resulted in us having to manually obtain the information.

You will have some content from the ICB by the end of the week.

Regards

NHS South Yorkshire Integrated Care Board
<https://southyorkshire.icb.nhs.uk/>

 Email:



**South Yorkshire
Integrated Care Board**



From:
Sent: 14 May 2025 15:41
To:

Cc:

Subject: RE: Sheffield IDP updates

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I'm on leave tomorrow and Friday – please could you send any response to my colleague [redacted] copied in. If we don't receive any response within the new few days, realistically the IDP addendum will have no choice but to say we were unable to obtain detailed information from the ICB. Public consultation on the new sites commences on 29 May, so we're already stretching the deadlines to get the document finalised in time.

Arup
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United Kingdom

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From:

Sent: 12 May 2025 09:03

To:

Subject: RE: Sheffield IDP updates

Grateful if there's anything you can come back on this with ASAP. If there's likely to be a future need for developer contributions to fund healthcare from the additional sites, it would be really helpful to have had that identified at this stage.

Thanks

Arup

East West Building, 1 Tollhouse Hill, Nottingham NG1 5AT

United Kingdom

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From:

Sent: 01 May 2025 11:00

To:

Subject: Sheffield IDP updates

Following on from our meeting back in March, how are you progressing with the identification of specific primary healthcare requirements in response to the additional greenfield sites being included in Sheffield's Local Plan? For interest, the confirmed set of sites has now been agreed by SCC members: <https://democracy.sheffield.gov.uk/documents/b30385/Item%2011%20-%20Sheffield%20Plan%20-%20Proposed%20Additional%20Site%20Allocations%20and%20Updates%20to%20the%20Evidence%20Base%20We.pdf?T=9>

We'll need to have any additional schemes identified by the end of next week in order to be included in an update to the IDP.

I believe you were also going to send us a list of updates on current primary healthcare schemes being progressed across the city, particularly those in and around the city centre. Grateful if you were still able to do that.

Thanks

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Assessment of proposed additional housing allocations - Primary Care

Site Ref	Postcode (near)	PCN(s)	Most relevant practice(s)	Other nearby Practices	Current Capacity Indicator	Homes	Patients	Impact	Notes / Requirement - Primary Care	Consultation comment
NES37	S35 8RY / S35 8QN	SAPA 5	SAPA 2, Margetson, Grenoside	Foxhill, Trafalgar House		609	1401	Yellow	Requires SAPA 2 Primary Care Hub to proceed, currently uncertain due to presence of fibre optic cable. Otherwise required capacity will not be available.	Provided the new SAPA 2 Primary Care Hub proceeds, there is expected to be sufficient primary care capacity
NES38	S35 8QS / S35 8PB	Network North	Grenoside, Foxhill, SAPA 2	Margetson		188	432			
NES39	S35 8PU	Network North	Grenoside, SAPA 2	Margetson, Foxhill		148	340			
CH05	S35 9ZX	Network North	Mill Rd, Chapeltown	Dunnic Rd, Chapel Green		549	1263	Yellow	Reconfigure / Additional capacity required to existing surgeries (+ 2 rooms)	Reconfigure / Additional capacity required to existing surgeries (+ 2 consult / exam rooms)
NWS30	S35 0GG	Upper Don Valley	Oughtibridge	Middlewood	Red	69	159	Red	Additional Capacity at Oughtibridge required. (+1 room) Middlewood has capacity but patients can be expected to choose Oughtibridge	Reconfigure / Additional capacity required to existing surgery (+ 1 consult / exam room)
NWS31	S35 0DT	Upper Don Valley	Oughtibridge	Middlewood	Red	103	237			
SES30	S13 7JH	Townships 2	Woodhouse	Handsworth, Olive Lane	Red	868	1996	Red	Reconfigure Woodhouse / re-open Beighton HC. (+2/3 rooms required). Olive lane capacity expected to be exceeded	Reconfigure / Additional capacity required to existing surgeries (+ 2/3 consult / exam rooms). Consider capacity alongside RMBC local plan also.
SS19	S12 3HS	Townships 2	Charnock, Matthews (White Lane) Stonecroft	Manor Top, Richmond, East Bank, Gleadless MC	Yellow	304	699	Yellow	Requires Additional capacity (+1 room) - currently under pressure	Reconfigure / Additional capacity required to existing surgery (+ 1 consult / exam room)
SWS18	S10 4LZ	West 3	Lodge Moor	Nethergreen	Red	258	593	Red	Requires additional capacity.(+1 room) but site is reaching end of useful life. Land availability an issue for the wider PCN	Reconfigure / Additional capacity required to existing surgery (+ 1 consult / exam room)
SWS19	S17 3DP	Portervalley	Carterknowlde & Dore - Dore Rd	Beauchief, Baslow Rd	Red	82	189	Red	Significant pressures currently exist, but increase is small. A contribution to +1 room should be considered	Reconfigure / Additional capacity required to existing surgery (+ 1 consult / exam room)
SES29	S13 9AS	Seven Hills	Olive Lane, Handsworth (M&B)	Darnall PCC, North Darnall	Yellow	870	2001	Red	Requires additional capacity, but nearest sites not suitable. Olive Lane capacity expected to be exceeded - more detailed planning is required for solution to be determined in consideration of neighbouring Local Authority plans	Reconfigure / Additional capacity required to existing surgeries (+ 2/3 consult / exam rooms). Consider capacity alongside RMBC local plan also.

Assessment of proposed additional housing allocations - Primary Care

Site Reference	Postcode (near)	PCN(s)	Current Capacity Indicator	Homes	Patients	Impact	Notes / Requirement - Primary Care	Consultation comment
SES30	S13 7JH	Townships 2		868	1996		Reconfigure Woodhouse / re-open Beighton HC. (+2/3 rooms required). Olive lane capacity expected to be exceeded	Reconfigure / Additional capacity required to existing surgeries (+ 2/3 consult / exam rooms). Consider capacity alongside RMBC local plan also.
SES29	S13 9AS	Seven Hills		870	2001		Requires additional capacity, but nearest sites not suitable. Olive Lane capacity expected to be exceeded - more detailed planning is required for solution to be determined in consideration of neighbouring Local Authority plans	Reconfigure / Additional capacity required to existing surgeries (+ 2/3 consult / exam rooms). Consider capacity alongside RMBC local plan also.

1738 3997

APPENDIX 13

Assessment of Primary Care capacity in respect of proposed residential developments

Assumptions:

For City Centre developments use 1.75 residents per unit of accommodation.
Outside of City Centre, use 2.3 residents per unit of accommodation.

Assume 100% of residents will register with closest practice(s) to the proposed development and are all new residents to Sheffield (i.e. no retention by, or transfer from, current GP practices).

Assume the practice catchment area covers or will be adjusted to include the proposed development site.

For developments (or series of adjacent developments) in excess of 6,000 new residents, assume new GP premises (branch) will be required unless adequate capacity exists or can be created by adjacent practices.

High-level assessment: Use benchmark of 1 additional clinical room required per 850 additional patients (including ARRS roles). Or 1 additional clinical room per 1,000 additional patients (GMS only)

Methodology.

- From proposed number of dwellings, estimate number of additional patients (units x1.75 or 2.3)
- Identify nearest GP practices to the development (up to 2 .5miles, using Google Maps, 'as crow flies'). Consider travel times (car / public transport).
- List those practices most likely to enrol new residents as patients, based on distance from the proposed development.
- From 6-Facet database (confidential practice data), consider if nearby practices currently have adequate capacity (Gross Internal Area per 100 patients, using raw list size)
- Estimate the impact a proportion of new residents registering would have on each practice. Where one practice is very close by, assume 100% or new patients would register there. Where current capacity is exceeded, recommend additional clinical capacity that would be required and feasibility of that capacity being created within the current practice or by extension of the existing practice.
- Consider the above in relation to other known or proposed developments also.

Dear Sadie,

Thank you for your email regarding the above.

In your email, you raise two main points – the first is about the provision of healthcare facilities to support the proposed housing growth and the second is about whether the impact of the local plan on the health of the population in S13 has been properly assessed. I will therefore address both these points.

Regarding the provision of healthcare facilities, I very much agree that it is important to ensure this takes account of the cumulative impact of development. Work done as part of producing the Infrastructure Delivery Plan (which accompanies the Local Plan) has highlighted the need to provide additional health facilities when considering the cumulative impact of development sites. I acknowledge there will be additional requirements for health care, particularly primary care, but likely also other forms of health care too. The Integrated Care Board and the Council remain in discussions about housing growth and primary care planning as the local plan moves towards adoption and implementation (assuming the Inspectors conclude that the Plan is sound). Some of this will require the building of new facilities but it may also involve new contracts or extensions to contracts with healthcare providers. I would like to reassure you that it is very much on our radar, and we will be looking at how additional facilities are funded, including using the Community Infrastructure Levy and other developer contributions as housing schemes progress to the planning applications stage.

In terms of the impact of the Local Plan on health, I am satisfied that this has been properly considered as part of preparing the Local Plan. I can only repeat the comments I made previously that the Integrated Impact Assessment (IIA) provides sufficient consideration of health impacts for the purposes of producing a Local Plan and that a separate Health Impact Assessment is unnecessary. As I noted previously, for both proposed employment land and housing land, the IIA includes assessments of impact that incorporate impact on health and wellbeing, alongside many other parameters. The methods are set out in full in the document(s), and incorporate considerations and recommendations around reasonable alternatives, mitigation & monitoring. The latest iteration of the IIA can be found here: [Sheffield Plan - Main modifications | Have Your Say Sheffield](#).

impact on health and wellbeing, alongside many other parameters. The methods are set out in full in the document(s), and incorporate considerations and recommendations around reasonable alternatives, mitigation & monitoring. The latest iteration of the IIA can be found here: [Sheffield Plan - Main modifications | Have Your Say Sheffield](#).

In your email you refer to my response to another campaigner last year, but I would also now add that the Planning Inspectors have considered the matters in detail as part of the examination public hearings that were held last autumn. It is apparent that the Inspectors are satisfied that health impacts were adequately covered in the evidence base associated with the Local Plan – they have not referred to any concerns about health impacts in their letter to the Council dated 18th January this year. Their conclusions will, however, be set out more fully when they issue their final report later this year. If you have concerns around this, you should direct them to the Inspectors as part of the current public consultation as part of the Local Plan process.

I do appreciate the challenges that this process presents and the concerns about infrastructure provision from the communities impacted. However, I hope the above provides a comprehensive response and some reassurance.

I have copied [redacted] & [redacted] in for info and knowledge.

Regards

[redacted]

REF5.0264

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

From [REDACTED]
Date Mon 2026-05-04 7:21 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

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

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 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,

Chloe Hazelby



02/05/2026

REF5.0265

Objection Sheffield planNWS31 Storth Lane School Lane

From [REDACTED]
Date Mon 2026-05-04 8:04 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Sir/Madam,

I am writing to formally object to the proposed Main Modifications to the Sheffield Plan, specifically those relating to Site Allocation NWS31 (land between Storth Lane and School Lane, S35 0DT).

My objection is based on serious concerns regarding the soundness, legality, and overall justification of allocating this site for development.

First, there has been insufficient investigation into the fundamental viability of the site. Known and evidenced issues relating to groundwater flooding, drainage, and land stability have not been adequately assessed. The current reliance on the Strategic Flood Risk Assessment is misplaced, as it fails to capture the well-documented and ongoing groundwater problems affecting both the site and the wider village. Releasing Green Belt land without robust, site-specific investigation risks irreversible damage for no justified reason.

Second, the proposed development would result in a significant and unacceptable loss of valued green and open space. This site is heavily used by the local community and provides accessible, informal recreational space that directly supports residents' health and wellbeing. The proposed compensatory measures are wholly inadequate, poorly located, and inaccessible for many—particularly older residents, those with disabilities, and families with young children. This raises serious concerns regarding compliance with the Equality Act 2010 and the Public Sector Equality Duty.

Third, access to the site via Don Avenue presents substantial and unresolved problems. The surrounding road network is already constrained, with congestion, limited parking, and safety risks—particularly around the local school and for vulnerable road users. There has been no sufficiently detailed assessment of construction access, emergency vehicle access, or the cumulative impact on local infrastructure. It is also concerning that only a single access point is proposed for a development of this scale.

Fourth, biodiversity impacts have not been properly addressed. There is clear evidence of protected species on and adjacent to the site, including bats and barn owls, yet the Main Modifications fail to explicitly require detailed surveys and appropriate mitigation. Given the site's high ecological value, there should be a firm commitment to deliver Biodiversity Net Gain on-site as a priority, not as an optional consideration.

More broadly, the justification for releasing this Green Belt land is increasingly questionable. Changing demographics, including declining birth rates and reductions in student numbers, call into question the accuracy of current housing projections. At the same time, alternative options exist through brownfield, windfall, and opportunity sites already identified within the Plan. Prioritising these would avoid unnecessary environmental harm.

I am also deeply concerned that the planning inspection process has not adequately reflected the reality on the ground. It is difficult to understand how informed conclusions can be reached without a proper site visit, particularly given the complex issues of flooding, access, and topography. This undermines confidence in the process.

There is a growing sense within the community that local voices are not being heard. Many residents feel disengaged and frustrated, believing that decisions are being made regardless of legitimate concerns. This risks repeating past mistakes and further eroding trust between the council and the communities it serves.

In light of the above, I strongly urge the Council to:

- Remove Site NWS31 from allocation within the Sheffield Plan; or
- At a minimum, require comprehensive, site-specific investigations into flood risk, access, and ecology before any progression toward development; and
- Commit to meaningful engagement with the local community to ensure that any future proposals are appropriate, deliverable, and equitable.

The current Main Modifications cannot be considered sound or justified in their present form.

Yours faithfully,
Lindsey Hudson



REF5.0266

Objection Sheffield plan MM411 & MM410 sites SES30 & SES29

From [REDACTED]
Date Mon 2026-05-04 8:49 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

I am a resident of [REDACTED] and wish to object to the proposed development at Bramley/Beaverhill SES30& SES29 Flockton/Handsworth .

This site will have a significant cumulative impact on the local highway network, particularly along Beaver Hill Road, Handsworth Road and connecting routes to the Sheffield Parkway. These roads already experience congestion at peak times, and the addition of approximately 800+ dwellings and a burial ground will materially worsen traffic conditions. There is insufficient evidence that the proposed mitigation measures will be delivered in advance of occupation or that they will adequately address cumulative impacts. In light of the recent Main Modifications MM410 and MM411, which seek to strengthen requirements around infrastructure delivery and site-specific mitigation, there remains a lack of clarity and certainty regarding how and when necessary transport improvements will be implemented. The modifications do not provide sufficiently robust or enforceable mechanisms to ensure that infrastructure is delivered in a timely manner relative to development, and therefore do not resolve concerns regarding the effectiveness of the plan.

The scale of development in S13 is also disproportionate. A substantial proportion of Sheffield's Green Belt housing allocation is concentrated within this area, raising concerns about whether the plan is justified and spatially balanced as required by national policy. The Main Modifications do not adequately address this imbalance.

In addition, the loss of large areas of open farmland will result in irreversible harm to the character of the area, biodiversity, and informal recreation space used by local residents. While MM410 and MM411 introduce additional mitigation requirements, these do not


sufficiently compensate for the permanent loss of Green Belt land or demonstrate that environmental impacts can be effectively mitigated. Finally, there is a lack of clear, deliverable infrastructure commitments, particularly in relation to GP capacity, school provision, and local services. Without guaranteed and phased delivery of infrastructure, secured through enforceable mechanisms, the development risks placing unsustainable pressure on existing communities. The proposed modifications do not provide sufficient assurance that this infrastructure will be in place prior to occupation.

For these reasons, I consider the allocation of this site to be unsound in terms of effectiveness, justification, and environmental sustainability, and I respectfully request that it is reconsidered.

REF5.0267

Representations on the Main Modifications to the Sheffield Plan (Site ref NWS31)

From [REDACTED]
Date Mon 2026-05-04 9:14 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

 1 attachment (390 KB)
MM Representations NWS31.pdf;

External email

Please find attached a letter detailing our representations on the Main Modifications to the Sheffield Plan in relation to site reference NWS31.

Kind regards

Paul Foster

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Strategic Planning
5th Floor, Howden House,
Sheffield, S1 2SH

4 May 2026

By Email: sheffieldplan@sheffield.gov.uk

Dear Planning Inspector,

We wish to make representations 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, local highway, biodiversity and social issues. All of these key issues were brought to the Government Inspectors' attention during the previous Consultation process but, disappointingly, none of our group's representations on these issues appear to have been acknowledged in the Main Modifications.

Notwithstanding the devastating impact it would have on the local community and wildlife habitat, releasing this site from Green Belt without properly and fully assessing the viability of the site for development would, in our view, be premature. Releasing Green Belt land for development should only be undertaken if such development can actually be delivered and it cannot be certain that this site is deliverable if the issues we have already raised are not fully assessed beforehand. Furthermore, releasing this land from Green Belt will undoubtedly impact on the value of homes surrounding the site which in turn could significantly increase the risk of Property Blight claims being made against the Council and/or its Developers making development an even less attractive proposition.

One further introductory point is that in the Government Inspectors' initial conclusions, it was indicated that since the Plan was submitted for final approval, further Brown Field sites have come to light which would provide sufficient capacity to cover the proposed housing density on all of the Green Belt sites that have been allocated. These have been referred to as "windfall sites" but, surely, in light of this, why is there a need to release any Green Belt land in the Sheffield Plan? What is clear is that the data on potential sites available for development is woefully out of date and before any

land is released from the Green Belt, a more current call for available sites should be undertaken and the Sheffield Plan updated accordingly.

Main representations

Most of the issues raised 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 deliverable, there needs to be 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 released from the Green Belt 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.

In the appendix to this letter, we set out our representations on the Main Modifications for proposed Site Allocation NWS31 (page 141/2) – Conditions on Development (MM332) and would respectfully ask that due consideration is given to the comments above and the representations submitted herein.

Yours sincerely

Paul Foster & Annabel Marshall-Foster

Appendix – Detailed representations

1 **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 Wharnccliffe 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.

2 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

3 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.

4 Biodiversity issues *(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 ("BNG")(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.”

REF5.0268

Save the Greenbelt

From [REDACTED]
Date Mon 2026-05-04 9:17 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Hi,

Please reconsider the Sheffield Plan in respect of building on the greenbelt.

The council, in particular the people in authority, will be remembered for all time to be the people who destroyed the make up of Sheffield currently known for its green credentials.

Regards,

K. Carter.

REF5.0269

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

From [REDACTED]
Date Mon 2026-05-04 9:17 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.

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,

Emma lines

REF5.0270

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

From [REDACTED]
Date Mon 2026-05-04 9:35 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>



Dear Strategic Planning Team,

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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.

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

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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.

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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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

Vicky Russell

REF5.0271

Re: Sheffield Plan – Main Modifications Consultation – notice of extension to consultation period

From [REDACTED]
Date Mon 2026-05-04 9:35 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

 1 attachment (32 KB)

Statement of Representations Procedure - Extension Update.docx;

To Whom It May Concern

The revised Local Plan documentation is complex and difficult to navigate, leaving it inaccessible to the very people whose lives will be most affected. Without clear, plain-English summaries, residents are left struggling to interpret dense, technical material, making it unreasonably hard to understand or comment on proposals that would reshape their communities for generations. It is fundamentally unfair that those facing the greatest impact are not given straightforward information about what amounts to a significant deterioration of their local environment.

Against this backdrop, the scale and concentration of development proposed on Sheffield's green belt is deeply irresponsible. Building over a thousand homes and extensive warehousing across S35 would remove essential green spaces, increase pollution and congestion, and heighten flood and environmental risks in an area already under strain. These green belt sites act as buffers between communities, support biodiversity, and provide natural landscapes that are integral to the character and balance of the area, once lost, they cannot be restored.

I also question the reasoning behind prioritising green belt land over the many brownfield sites across Sheffield that remain unused or under-utilised. What makes this particular land so important that it justifies overriding environmental concerns, destroying habitats, and placing further pressure on already stretched infrastructure?

Green belt policy exists to prevent exactly this kind of urban sprawl and environmental harm, yet the plan appears to disregard these principles without offering a clear or compelling justification. Choosing green belt over brownfield undermines sustainable development and risks leaving derelict areas untouched simply because open land is easier or more profitable to develop.

Concentrating such a disproportionate share of the city's housing and employment allocation in one small part of Sheffield places an intolerable burden on local infrastructure. Roads, public transport, schools, healthcare services and community facilities are already stretched, and these proposals would push them far beyond capacity. The cumulative impact on long-established communities would be severe, affecting daily life, safety and overall quality of living.

Proceeding with development of this scale on protected land, while presenting the information in a way that is difficult for the public to scrutinise, fails to demonstrate the transparency, diligence and balanced planning that Sheffield deserves. It is neither sustainable nor fair, and it risks permanently damaging the character, environment and future of the communities it claims to serve.

Regards
Mark

Sent from my iPhone

On 23 Mar 2026, at 14:56, SheffieldPlan <sheffieldplan@sheffield.gov.uk> wrote:

Dear Consultee

Sheffield Plan – Main Modifications Consultation – notice of extension to consultation period

We are writing to you because you have previously expressed an interest in the Sheffield Plan, made a representation on the Sheffield Plan, or are a statutory consultee. We wrote to you on 2nd March 2026 to advise you of a period of consultation on proposed modifications to the Sheffield Plan.

This is a notice to let you know that the consultation period on proposed modifications to the Sheffield Plan has been extended to **5th May 2026**. Following the launch of the consultation, several documents have been updated reflecting additional dialogue with the Inspectors. Further details of these updates can be found in a document entitled '**Sheffield Plan: List of Updates to the Main Modification Documents**' that now also forms part of the consultation.

The Main Modifications Consultation

The purpose of this Main Modifications consultation is to provide the opportunity for representations to be made on the 'soundness' and legal compliance of the proposed Main Modifications (see schedule of Proposed Main Modifications and Schedule of changes to the Policies Map arising from proposed Main Modifications) to the Plan, prior to the Inspectors issuing their final report.

We are also consulting on:

- The Integrated Impact Assessment (Update and Addendum) (2026) and Non-Technical Summary.
- The Integrated Impact Assessment Report Addendum: Modifications Consultation – including Non-Technical Summary (2026).
- Habitats Regulations Assessment Update (2026).

The Council has also published a Schedule of Additional Modifications to the Plan and Additional Modifications to the Policies Map. These are minor changes and do not constitute Main Modifications. Comments on them will be considered by the Council.

Alongside the consultation, a track-changed version of the Sheffield Plan will be made available for the purpose of assisting in understanding the effect of the proposed Main Modifications and Additional Modifications in context. This is not the subject of consultation.

The period for representations will run for 9-weeks from Monday 2nd March to 5pm Tuesday 5th May 2026.

Document availability

The consultation documents, tracked change version of the Sheffield Plan, guidance note and Frequently Asked Questions will be available to view on the Council's consultation website: <https://haveyoursay.sheffield.gov.uk/projects>

Hard copies of all the documents will be available to view during normal opening hours at:

- the Council's main office at Howden House, 1 Union Street, Sheffield S1 2SH
- all libraries (Council and Volunteer-run)
- Hillsborough First Point
- Chapeltown First Point

All other supporting documents submitted as part of the examination, and produced during the examination, remain available to be viewed at our main office, Howden House, 1 Union Street, Sheffield S1 2SH and online on the examination website: <https://www.localplanservices.co.uk/sheffieldplan>

Commenting

You can make your comments in any of the following ways:

- Online via the consultation website: <https://haveyoursay.sheffield.gov.uk/>
- On paper representations forms:
 - Scanned and emailed to SheffieldPlan@sheffield.gov.uk or
 - Printed and returned by post to Strategic Planning, Howden House, Union Street, Sheffield S1 2SH
- By email to SheffieldPlan@sheffield.gov.uk
- By letter to Strategic Planning, Howden House, Union Street, Sheffield S1 2SH

If you have difficulty accessing any of the consultation documents at library or First Point locations, or online via the Consultation Portal, or you need any further advice or information, please contact us at SheffieldPlan@sheffield.gov.uk You can call us on 0114 2735274.

A copy of the relevant documents may be obtained by post or email. A charge will be made for any documents provided by post based on the print cost of the document.

If you need documents in alternative format or want to purchase a print copy of a document please contact SheffieldPlan@sheffield.gov.uk or phone (0114) 2735259

Please also contact us at the above address if you no longer want us to contact you about the Sheffield Plan.

Yours faithfully
Simon Vincent
Strategic Planning Service Manager

Data Protection

All representations will be forwarded to the Inspectors examining the Sheffield Plan. To ensure an effective and fair examination, it is important that the Inspectors and other participants in the examination process know who has made representations on the Plan - therefore it is necessary to include the names of all respondents.

Please do not include identifying or sensitive information within the body of your response as we are not asking for this. For example: please **do not** include your address or street, names of others or details of anyone's health, ethnicity, family situation or similar information that could lead to people being identified.

The information you provide (including your name and contact details) will be kept in accordance with terms of the Data Protection Act 2018 and will only be used for the purpose of the Sheffield Plan consultation and examination. Sheffield City Council is the data controller for the information on this form for the purposes of the Data Protection Act 2018.

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 and should be handled accordingly. If this Email has been misdirected, please notify the author immediately. If you are not the intended recipient you must not disclose, distribute, copy, print or rely on any of the information contained in it or attached, and all copies must be deleted immediately. Any views or opinions expressed belong solely to the author and do not necessarily represent those of the council. In particular, the council will not accept liability for any defamatory statements made by email communications. Whilst we take reasonable steps to try to identify any software viruses, any attachments to this Email may nevertheless contain viruses which our anti-virus software has failed to identify. You should therefore carry out your own anti-virus checks before opening any documents. Sheffield City Council will not accept any liability for damage caused by computer viruses emanating from any attachment or other document supplied with this Email. Be aware that this email communication may be intercepted for regulatory, quality control, or crime detection purposes unless otherwise prohibited. 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 and should be handled accordingly. If this Email has been misdirected, please notify the author immediately. If you are not the intended recipient you must not disclose, distribute, copy, print or rely on any of the information contained in it or attached, and all copies must be deleted immediately. Any views or opinions expressed belong solely to the author and do not necessarily represent those of the council. In particular, the council will not accept liability for any defamatory statements made by email communications. Whilst we take reasonable steps to try to identify any software viruses, any attachments to this Email may nevertheless contain viruses which our anti-virus software has failed to identify. You should therefore carry out your own anti-virus checks before opening any documents. Sheffield City Council will not accept any liability for damage caused by computer viruses emanating from any attachment or other document supplied with this Email. Be aware that this email communication may be intercepted for regulatory, quality control, or crime detection purposes unless otherwise prohibited.

External email

REF5.0272

MM411 MODIFICATION Reference

From [REDACTED]
Date Mon 2026-05-04 9:53 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Michelle Bond
[REDACTED]

**To: Strategic Planning Team, Planning Service
5th Floor, Howden House, Sheffield, S1 2SH
RE: Formal Objection to Sheffield Local Plan – Proposed Green Belt Allocations in S13
(Sites SES29 & SES30)**

To the Strategic Planning Team,

I am writing to formally record my objection to the proposed removal of Green Belt protection for land in the S13 area, specifically sites SES29 (Handsworth Hall Farm) and SES30 (Land between Bramley Lane and Beaver Hill Road). My objection is based on the following planning grounds:

- **Inappropriate Use of Green Belt:** Under the National Planning Policy Framework (NPPF), Green Belt boundaries should only be altered in "exceptional circumstances". I do not believe the Council has sufficiently demonstrated that all brownfield alternatives have been exhausted before targeting these high-value green spaces. The "compensation" of added rights of way far out ways the loss of Greenbelt forever. The fields have been arable farmed for years and is amongst the best, the MM184 removes the requirement for soil surveys to be taken on Green Belt, its seems like every rule has been changed to build on Green Belt when there are plenty of brownfield sites available throughout the city which have not been properly looked into.
- **Infrastructure & Service Strain:** The S13 area already suffers from significant pressure on local GP surgeries, dentists, and schools. Adding approximately 827 new homes, school and cemetery will overwhelm these existing services, which currently lack a funded expansion plan.
- **Traffic & Highway Safety:** The proposed developments will lead to a substantial increase in vehicle movements on already congested routes like Beaver Hill Road and Handsworth Road. This raises serious concerns regarding air quality, noise pollution, and the safety of local school walking routes. As the plan states that the added traffic from the 827 houses will have to use Beaver Hill Rd, adding serious safety and traffic issues.

- **Environmental & Ecological Impact:** These sites provide vital wildlife corridors and habitats. No protected species surveys have been carried out. The Council's own ecological assessment suggested the site could be used for national biodiversity rather than development, this is an ancient woodland, grassland site. SES2502, in particular, has been noted for its ecological value and rural character, which would be permanently destroyed by development.
- **Flooding Risks:** Developing these green fields will increase surface water run-off, heightening the risk of flooding for existing downstream properties in the Handsworth area. I urge the Council and the Planning Inspectors to reconsider these allocations and prioritise the protection of our local ancient Green Belt and wildlife in S13 for the health and wellbeing of current and future residents. It's a small area of Green Belt you are willing to destroy when there are larger Brown Belt areas to use. S13 is not a second class area where you think we will be ok to lose our bit of nature. We matter our kids future matters.

Yours faithfully

Michelle Bond.

Sent from [Outlook for Android](#)

REF5.0273

Objection to Changes to Sheffield Local Plan

From [REDACTED]
Date Mon 2026-05-04 10:04 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

[REDACTED]

Dear Sir / Madam,

I am writing to express my objection to the proposed main modifications to the Sheffield Local Plan, specifically in relation to site NES39.

I am glad to see that NES39 parcels B and C have been removed from the plan, but disappointed to see that parcel A remains in the plan. It is equally as attractive as parcels B and C and also "makes a strong contribution to the character and setting of the local area". Development of parcel A will impact both parcel B and parcel C, and the overall beauty of this area of the green belt. Development of parcel A would also cause significant landscape and visual harm.

Parcel A contains a plethora of wildlife and vegetation, some of which are endangered, along with historic hedgerows and dry stone walls which can be dated back to the 1770s. In summer, the meadow is beautiful and full of summer flowers which allow the pollinators to do their work. Local people are regularly seen admiring the view over parcel A and it contributes significantly to our local area. The whole of NES39 lies within high quality open landscape that the inspector described as beautiful. Any development of it will harm the area's rural character and openness, and there are many unresolved issues with access, drainage on steep slopes, historical aspects and impact on the local wildlife site. Any allocation of this site, no matter the size, is inappropriate.

Yours Sincerely,

Mr Derek Walton

REF5.0274

Modification references MM411 and MM410

From [REDACTED]
Date Mon 2026-05-04 10:24 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Sheffield Council,

I have lived in Handsworth for 25 years and I am writing to record my objection to the Main Modification to the Sheffield Local Plan.

References MM411 (site SES30) and MM410 (site SES29).

Overall, the consultation process has been run very poorly. Those without access to the Internet have been actively excluded from any consultation and that will mean a large proportion of the residents will be unaware of the content, and possibly even the existence, of these proposals. Furthermore, documents for our attention have been submitted after deadlines and have been very difficult to decipher thus leading us as residents to fund raise for our own specialist advice. This is unfair and unjust.

The SES30 site has been earmarked as a site of high ecological importance and there is no clear plan of how the legally required 10% Biodiversity Net Gain will be met. Once this is gone it is gone forever and the plan should not go ahead as this hasn't been proven. Taking 90% of our greenbelt is unjust and will have a devastating impact on our environment.

There will be a massive increase in traffic which is supposed to be using Beaver Hill Road and Retford Road. Since the continued expansion of the Waverley development there has already been a significant increase in traffic with significant delays at peak times. There is no fully evidenced plan to mitigate these impacts. By removing our green belt and increasing our pollution you are negatively affecting the health and well being of our population which is already being affected negatively by the massive Waverley development. There is clear evidence that poorer areas are less healthy than more affluent areas and with this building you will be massively increasing our health inequality.

Furthermore, Beaver Hill Road floods regularly, this is without the addition of more houses. There is no clear evidence of how this increased flooding risk will be mitigated and how residents will then be able to gain access.

I consider Modification MM411 (site SES30) and Modification MM410 (site SES29) to be unsound. They are not justified. I would like to request that these are removed from the plan and retained as Green Belt.

I would like to be updated by email with the outcome of my objection.

Yours sincerely,
Anja Charlesworth



Sent via BT Email App

Modification references MM411 (siteSES30) and MM410 (site SES29)

From [REDACTED]
Date Mon 2026-05-04 10:29 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Please note this is a resubmission of a previous email as I had included my address on the previous one.

Dear Sheffield Council,

I have lived in Handsworth for 25 years and I am writing to record my objection to the Main Modification to the Sheffield Local Plan.

References MM411 (site SES30) and MM410 (site SES29).

Overall, the consultation process has been run very poorly. Those without access to the Internet have been actively excluded from any consultation and that will mean a large proportion of the residents will be unaware of the content, and possibly even the existence, of these proposals. Furthermore, documents for our attention have been submitted after deadlines and have been very difficult to decipher thus leading us as residents to fund raise for our own specialist advice. This is unfair and unjust.

The SES30 site has been earmarked as a site of high ecological importance and there is no clear plan of how the legally required 10% Biodiversity Net Gain will be met. Once this is gone it is gone forever and the plan should not go ahead as this hasn't been proven. Taking 90% of our greenbelt is unjust and will have a devastating impact on our environment.

There will be a massive increase in traffic which is supposed to be using Beaver Hill Road and Retford Road. Since the continued expansion of the Waverley development there has already been a significant increase in traffic with significant delays at peak times. There is no fully evidenced plan to mitigate these impacts. By removing our green belt and increasing our pollution you are negatively affecting the health and well being of our population which is already being affected negatively by the massive Waverley development. There is clear evidence that poorer areas are less healthy than more affluent areas and with this building you will be massively increasing our health inequality.

Furthermore, Beaver Hill Road floods regularly, this is without the addition of more houses. There is no clear evidence of how this increased flooding risk will be mitigated and how residents will then be able to gain access.

I consider Modification MM411 (site SES30) and Modification MM410 (site SES29) to be unsound. They are not justified. I would like to request that these are removed from the plan and retained as Green Belt.

I would like to be updated by email with the outcome of my objection.

Yours sincerely,
Anja Charlesworth

Sent via BT Email App

Sent via BT Email App

REF5.0275

Objection to protect ses30 greenbelt

From [REDACTED]
Date Mon 2026-05-04 10:31 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

MM411 modification ref.

I would like to put forward my objection to the handover of our greenbelt land at both sites including handsworth farm, i feel this area has been under represented and feel the councils decision is not fairly distributed.

I understand the need for homes but to put that case load in this targeted area is quite discusting, dont think the planning has worked across the board fairly to improve affordable homes across the city !!

Also forgetting the disastourous floods 13 years ago which was before waverley was built the distruction of the woodlsnd paths that sits between waverly and the railway track all bulldosed down for large industrial units, its also beggars belief that you would sacrifice food growth for homes, how do we feed everyone in these extra homes ? This plan has just been scapegoated, not enough forward planning from sheffield planners over the last 30 years,

You have not shown how a 10% net gain in bio diversity can be acheived for SES30 the councils own ecollogical assessment said ghe site could be used for national biodiversity schemes rather than development.
Thats before we go onto the roads with the only answer to scc to traffic problems is traffic lights, mimimal parking yellow lines caz costs busgates and fines !!

Kind regards
Jennifer Poole

Sent from [Outlook for Android](#)

REF5.0276

[Sheffield Local Plan] Main Modifications Response: Petition Evidence and Community Support

From Sheffield Green Belt Alliance 

Date Mon 2026-05-04 10:44 AM

To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

Cc 

 1 attachment (140 KB)

Petition Evidence and Community Support.pdf;



Dear Local Plan Team,

Please find attached a representation from the Sheffield Green Belt Alliance regarding the Main Modifications consultation.

Please could you confirm receipt of this email and that you are able to open the attachment.

Yours sincerely,

Becky Travis-Brooker

On behalf of the Sheffield Green Belt Alliance

Petition Evidence & Statement of Community Support

On behalf of the Sheffield Green Belt Alliance

1. Purpose

This representation is submitted on behalf of the Sheffield Green Belt Alliance. Its purpose is to place before the examination evidence of the scale, breadth and seriousness of community concern about the proposed Green Belt allocations and the way the Local Plan process has developed.

The proposed Additional Site Allocations were introduced very late and were not part of the Plan as many residents understood it during earlier consultation. Despite this, residents engaged in good faith; submitting thousands of representations, attending hearings, and raising material concerns about whether these sites are appropriate, justified, deliverable and capable of meeting the housing numbers now relied upon. The Inspectors' post-hearing letter of January 2026 leaves the proposed allocations materially unchanged. Many residents feel their concerns have not been heard.

This petition evidence is not a substitute for earlier engagement. It is evidence that concern has continued, widened and hardened. It is directed in particular to MM10, MM87 and MM90–MM93 (housing strategy, land supply and trajectory), MM60, MM63, MM68, MM71, MM74 and MM80 (sub-area and boundary modifications), and the site-specific Main Modifications in Annex A.

2. Scale and Breadth of Community Concern

Residents have submitted thousands of representations through formal channels; the Alliance understands over 3,500 during the June consultation and approximately 2,500 during the December consultation. The petition figures below represent a continuation of that engagement, not a replacement for it.

[Save Sheffield's Green Belt Petition](#)

Signatures - All Platforms (as at 2 May 2026)

Platform	Signatures
Change.org	3,507
Online forms	2,504
Hard-copy petitions	1,834
Combined total	7,845

Wider Community Reach

Measure	Total
Combined Facebook group membership across SGBA groups	11,788
Combined site-specific Change.org petitions (excluding Sheffield Alliance petition)	19,172

Breakdown by Community Group

Site / Community Group	Change.org (02/05/26)	Facebook (01/05/26)
Chapeltown Group	3,730	2,100
Ecclesfield	908	—
Grenoside	4,923	—
Ecclesfield & Grenoside Group	N/A	1,900
Chapeltown, Ecclesfield & Grenoside Page	N/A	5,200
S12 Group	3,072	688
Handsworth Group	3,967	1,900
Lodge Moor & Redmires	2,572	N/A
Totals	19,172	11,788

These figures demonstrate concern that is geographically distributed across multiple communities, not confined to one area or group. It is recognised that some individuals may have signed more than one petition; duplicates have been identified within digital platforms where possible. This does not affect the overall conclusion: **there is substantial, continuing and widespread community concern about the proposed allocations.**

3. The Council's Own Admissions

As reported in the Alliance's open letter of [20 March 2026 to the Chief Executive of Sheffield City Council](#), the Leader of the Council, Cllr Tom Hunt, has acknowledged that the distribution of Green Belt release is "unfair", that "given more time the Plan might have looked different", and that the Council "may not have got it right".

At a [Local Area Committee meeting at Woodhouse Library on 17 June 2025](#), Michael Johnson, Head of Planning, was asked how the Green Belt release would improve quality of life for residents. His on-the-record response was that there would be "an impact on communities and sacrifices will be needed", and that he "sympathised with residents".

These statements come from those directly responsible for the Plan. They acknowledge unfairness, possible error and reliance on community sacrifice. The Alliance submits that this raises serious doubt as to whether the Plan satisfies paragraph 35(a) of the NPPF (requiring a positively prepared strategy consistent with

sustainable development) and paragraph 35(b), which requires the strategy to be justified and reasonable alternatives to have been adequately explored.

4. Process Complexity and Engagement Failures

Over 300 examination documents have been issued since publication of the Draft Plan, including revised housing supply calculations, new technical evidence and site-specific material. The Main Modifications consultation has been extended following further changes, producing modifications to the modifications. The material on which the public has been asked to comment no longer resembles the Plan consulted upon at Regulation 18 and 19, nor the version put to elected members. With no accessible summaries to aid navigation, this complexity has created a significant barrier to meaningful participation for residents without planning expertise.

It was against this backdrop that the Alliance launched the Save Sheffield's Green Belt petition. The Main Modifications consultation process was so technically complex and legalistic that it created a meaningful barrier to participation for many residents; including, the Alliance understands, some respondents with professional planning and legal backgrounds. The Alliance has actively encouraged and supported individuals to submit their own formal objections. However, it has also been clear that petition signatures would be submitted as evidence of community concern, and **for many residents this represents their primary means of engagement with this stage of the process, in place of a formal representation.** The petition was therefore designed not as a campaigning tool but as an accessible route into a process that the formal consultation structure had made inaccessible to many.

The Council has cited participation levels as evidence of successful consultation. That assessment does not reflect how engagement was actually achieved. Residents and tenants directly affected by site allocations were never notified. Requests for planning officers to attend community meetings (including those facilitated via the local Member of Parliament) were declined. High levels of engagement were driven by community groups and volunteers, not the Council.

That this standard was not inevitable is demonstrated by a recent Council housing policy consultation, which delivered a 12-week period, 66 in-person events, targeted outreach to under-represented groups, and accessible materials with assisted participation, all within the same broad timeframe as Local Plan preparation. The Local Plan, which identifies specific sites and directly affects identifiable communities, was not supported by anything comparable.

The petition was structured across multiple channels:

- a public online platform (change.org);
- a dedicated online form via a website with appropriate data consent;
- hard-copy forms for residents without digital access.

This structure was designed to fill the gap the Council left; ensuring that residents without digital access, or without the capacity to navigate a formal consultation, were not excluded entirely. It is a proportionate response to a process that placed unrealistic demands on residents while providing insufficient support.

5. Conclusion

The Sheffield Green Belt Alliance asks the Inspectors to give this petition evidence proper weight as evidence of continuing, widespread and serious community concern. Residents have engaged repeatedly and in good faith. Many are left with the clear impression that their concerns have not been meaningfully reflected in the Plan and that the allocations remain effectively untouched.

The petition records not only opposition to particular sites, but a wider loss of confidence in the accessibility and responsiveness of the process. The Alliance asks the Inspectors to consider whether the proposed allocations can properly be found sound where such extensive and unresolved concerns remain.

REF5.0277

Objection to modifications specifically MM410 and MM411

From [REDACTED]
Date Mon 2026-05-04 10:45 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Good Morning

As a resident of S13, I would like to put on record my objections to the Sheffield local plan specifically modifications MM410 and MM411, which relate to sites names SES29 and SES30. I consider these modifications to be unsound, a risk to human wellbeing and quality of life, damaging to the wildlife, ecosystem and biodiversity and the environmental habitats and detrimental to landscape (risk of future flooding), as well as being unsustainable and request the removal of both sites from the Local Plan for the reasons outlined below.

Firstly, there are a number of city-wide environmental concerns presented by the proposed Main Modifications. According to the Integrated Impact Assessment, the modified Plan performs worse across several metrics, including biodiversity, landscape and transport.

In S13 specifically, the SES30 site has been identified as being of high ecological importance, and there is no clear plan as to how the legally required 10% Biodiversity Net Gain will be met. Some ecological assessments remain incomplete, and those that have been completed were produced after the allocation decision. In SES29, there is a lack of up-to-date evidence and missing ecological information. Both point towards a lack of adequate steps being taken to prevent environmental harm. It is not possible to properly plan mitigation without robust evidence of what is being mitigated, and the Habitats Regulations Assessment appears to rely on the assumption that effective mitigation will be delivered, rather than demonstrating it.

The SES30 site is of significant cultural and religious importance, housing a burial site of local Quakers from the 1600's, formerly known as Cinder Hill. It is also the well known site of where George Fox, founder of the Quaker movement preached many times to thousands of people who had gathered to hear him. I fear the religious and cultural importance of the site hasn't been considered at all and nor has the impact of it's loss.

Although I am not a Quaker, I do often join Quaker Friends online meetings and find peace, comfort and significance in this (SES30) site. I follow an Earth based spiritual path and regularly use the areas known as SES29 and SES30 to support my emotional and spiritual needs and support my mental health condition. Many others use this same space to meet their spiritual needs and this is a form of worship.

My [REDACTED] are [REDACTED] recognised as Disabled, and this space, so close to the local schools has been key to support their attendance, overall wellbeing and pivotal to their inclusion in schools. Losing this site will have an impact on those children, parents, carers and adults with Autism, adhd and mental health problems, a space to regulate would be lost forever and would significantly impact attendance and inclusion at local schools.

There are a significant number of assumptions made based on vague prescriptions and limited evidence. As well as the reliance on mitigation that has not been fully developed, there is a lack of clarity on how the "Golden Rules" of Green Belt release will be met in practice.

In S13, for example, the proposed school and burial ground on the SES30 site have not been confirmed as needed and may later be reassessed (potentially for additional housing). This creates a risk that the original justification for Green Belt release, based on exceptional circumstances, is undermined.

On the SES29 site, there are also a number of unresolved constraints. For example, there has not been a comprehensive mining survey completed, which is essential in this high-risk area. There are also doubts about how much of the land is actually developable, meaning the capacity figures set out in the Plan may be overstated.

Both sites also appear to rely on unrealistic assumptions about building rates. This represents a clear divergence from the National Planning Policy Framework, particularly in relation to effectiveness and deliverability. Deliverability has not been demonstrated, and this conflicts with the requirement for plans to be effective. Other sites have been removed due to similar concerns, yet SES29 and SES30 have remained.

The Main Modifications also create and add to significant transport issues, including a wider issue of housing being directed towards car-dependent locations. This is particularly concerning given that the density estimates of city-centre developments in areas more easily accessed by public transport appear to be unusually low when compared to similar cities, conflicting with the NPPF requirement "plans should promote an uplift in density in urban areas."

In S13, key access routes are already under significant pressure, particularly Beaver Hill Road and Retford Road. The additional traffic from these developments would create both air quality and safety concerns and is likely to result in severe congestion. There are currently no clear or fully evidenced plans to mitigate these impacts. Significant highway works would be required, which may further affect the viability of the sites. Improvements to public transport infrastructure have also not been funded or secured.

I would like to raise concerns about the procedural fairness of the Main Modifications consultation. I do not believe sufficient steps have been taken to ensure the process is widely understood or accessible, and some key evidence has been introduced late. Changes of this scale, including a substantial increase in housing numbers in South East Sheffield, should not be introduced solely through Main Modifications.

I consider Main Modification MM411 (site SES30) and MM410 (site SES29) to be unsound. It is not justified and not consistent with national policy. I request that SES30 and SES29 be removed from the Plan and retained as Green Belt.

I have concerns relating to the examination process itself. It appears that the Council has been given repeated opportunities to revise and extend its proposals, raising concerns about fairness and consistency. As a resident, this gives the impression that the process has not been as balanced or responsive to community concerns as it should be.

Additionally to this, in terms of legal Compliance, I outline the concerns below:

1. Legal Compliance Arguments (whether the Plan follows the law)

A. Failure to Comply with the Environmental Assessment Regulations

Under the **Environmental Assessment of Plans and Programmes Regulations 2004**, the Council must demonstrate that all reasonable alternatives have been assessed.

- The Council has **not demonstrated that brownfield alternatives were fully assessed** before allocating greenfield land in S13.
- The Integrated Impact Assessment (IIA) or Habitats Regulations Assessment (HRA) does not specifically evaluate the S13 site, this is a **procedural failure**.

Inspectors must ensure the plan complies with these regulations.

**B. Failure to Comply with the Duty to Cooperate (Planning & Compulsory Purchase Act 2004)

The Council has not shown evidence of sufficient cooperation with neighbouring authorities (Rotherham, Derbyshire) regarding housing numbers or land supply.

- The allocation of greenfield land in S13 is **unlawful** because cross-boundary alternatives were not explored fully.

The Duty to Cooperate is a **legal test** and therefore the Plan cannot be adopted.

**C. Inadequate Consultation (Town and Country Planning Regulations 2012)

Residents were not properly notified and key documents were updated late in the process.

- The consultation is **procedurally unfair** because updated documents were released after the consultation began.
- This may breach **Regulation 18 and 19** consultation requirements.

**2. Soundness Arguments (required by the NPPF)

Main Modifications have not made the Plan **sound**. The four tests of soundness are:

- **Positively prepared**
- **Justified**
- **Effective**
- **Consistent with national policy**

None of the tests of soundness have been met.

A. Not Positively Prepared

The NPPF requires councils to meet housing need *while protecting the environment*.

- The Council has *over-allocated greenfield land* instead of maximising brownfield regeneration.
- The Inspectors already asked Sheffield to increase housing numbers, but this does not automatically justify using greenfield land in S13.

B. Not Justified (No Evidence the Allocation Is the Best Option)

- The Council has *not provided robust evidence* that S13 greenfield land is the most sustainable or least harmful option.
- The Sustainability Appraisal does not demonstrate that alternatives were properly compared.
- The site has biodiversity, flood risk, heritage value, and recreational use and the Council has not shown why it is still preferable and therefore the allocation is *unsound*.

C. Not Effective (Cannot Be Delivered)

The site has constraints.

- The allocation is *not deliverable* within the plan period (to 2039).
- Infrastructure (roads, drainage, schools, GP capacity) is insufficient and no costed funded mitigation is identified.
- This fails the NPPF requirement for plans to be "effective and deliverable".

D. Not Consistent with National Policy

The NPPF contains strong protections for:

- *Green Belt*
- *Biodiversity net gain*
- *Local green spaces*
- *Flood risk areas*

- **Valued landscapes**
- **Recreational land**

These all apply to the S13 site.

- The allocation **conflicts with NPPF paragraphs 174–182**, which require councils to protect natural capital, biodiversity, and greenfield land unless absolutely necessary.
- The site is used by the community, and qualifies as a **valued landscape**, which the NPPF says must be protected.

3. Site-Specific Characteristics - Legal Arguments

A. Biodiversity and Wildlife Law

The site contains protected species and habitats:

- The Council is breaching the **Wildlife and Countryside Act 1981** or the **Conservation of Habitats and Species Regulations 2017**.
- The HRA has not shown that there is no adverse effect on protected sites - therefore the allocation is unlawful.

B. Flood Risk (NPPF + Flood and Water Management Act 2010)

The land will have flood and surface water issues:

- The Council must apply the **Sequential Test** and **Exception Test**.
- The allocation is **unsound and unlawful** otherwise.

C. Loss of Open Space (NPPF para 99)

The NPPF states:

> Existing open space should not be built on unless equivalent or better provision is made elsewhere.

S13 land is used for recreation, dog walking, informal play, and community use - including an annual community run event - The Handworth Hobble

- The Council has **not provided replacement open space**, making the allocation contrary to national policy.

**4. Procedural Argument: The law is clear:

****Main Modifications cannot introduce new allocations unless absolutely necessary for soundness.****

- The allocation is ****unlawful**** because it goes beyond what Main Modifications are allowed to do.
- It should instead trigger a new Regulation 18/19 consultation.

Please consider my points made and address these


Regards

Angela Brown

REF5.0278

MM332 Site NWS31

From [REDACTED]
Date Mon 2026-05-04 11:08 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

 1 attachment (30 KB)
sheffield-plan (2).docx;

External email

Please read.
I'm sharing my concerns regarding this proposed development.

Heather Dewick

[REDACTED]

Sheffield Plan-Consultation on Main Modifications

To: Strategic Planning

5th Floor, Howden House,

Sheffield, S1 2SH

Email: sheffieldplan@sheffield.gov.uk

Dear Planning Inspector,

I 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. Development of this site would result in significant negative impacts to local residents, particularly in the area of Health and Wellbeing due to loss of amenity of Green and Open Space.

I personally use this space daily, as someone living with [REDACTED] it is a place I feel safe in, and have easy access to. Nature and green space is vital to my wellbeing, and to have this taken away would cause me immense grief.

This loss of green space will negatively affect wildlife habitat. I have seen and recorded Red List bird species on the Horse Field, including linnet and curlew.

Building on this field would also result in visual loss of this historic landscape, and potential damage to the wonderful and protected Glen Howe Park.

Regarding the 15m 'buffer' required for the LWS, how can a space of 3.85 hectares, of which 3.42 ha have been allocated for housing, possibly have enough space left to actually implement this?

Developers frequently renege on obligations put upon them as condition for building; what solid guarantees do we have that, for example, hedgerows won't be removed? (Or that the "affordable" housing will suddenly be "unviable"?)

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:

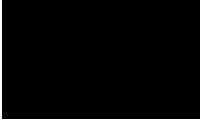
1. Further detailed assessment should be carried out for Protected Species present on site or very close to the site and BNG should be adjusted accordingly.
2. BNG for watercourse should be calculated.
3. Mitigations should be put into place for all identified Protected Species and their habitats including 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,

Heather Dewick



REF5.0279

Proposed buildings at S13

From [REDACTED]
Date Mon 2026-05-04 11:18 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Sir

I write to regarding the above proposal which I believe is not viable.

My reasoning is firstly I use this greenbelt land daily for my walks. I listen to the bird song, I watch the buzzards and kestrel watch and listen to the blackbirds. All this helps my mental health and physical health.

Secondly the roads and infrastructure cannot cope with the amount of traffic at the moment so what is it going to be like with all those extra houses?

Also getting a doctors appointment now is impossible so what is that going to be like? As I know the only thing that is on offer is a couple of more rooms at Handsworth and Woodhouse surgeries. Sorry but that is not solving the problem also it is impossible to expand these buildings as there is no where to expand. Also there will be more people with respiratory disease with the extra traffic which has been medically proven.

The sewage system can not cope now as we already know.

So all in all I believe these plans to be totally unsuitable and not been given the proper consideration.

Regards

Lorraine Mellor
[REDACTED]

REF5.0280

Representation on Main Modifications MM410 and MM411

From [REDACTED]
Date Mon 2026-05-04 11:19 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[REDACTED]

To whom it may concern.

I wish to object to your modified plan and particularly MM410 and MM411.

The Council's own assessment shows the modified plan performs worse for the environment, including impacts on land, biodiversity and transport.

The increase in housing comes at a clear environmental cost, and this has not been properly justified.

The modifications rely on future plans and assessments rather than showing how problems will be solved now.

Too many important details are being left until later stages, which means the plan is not properly worked out or deliverable.

The plan refers to "Golden Rules" for Green Belt release but does not clearly explain what will actually be delivered or how it will be enforced.

There are no clear measures or guarantees showing how these improvements will be achieved in practice.

The scale of these modifications is significant and represents a major change, not a minor update.

The plan assumes future mitigation will solve problems, but these solutions are not clearly defined or guaranteed.

A plan should show how harm will be addressed before approval, not rely on future solutions.

Other sites have been removed due to lack of deliverability, but these Green Belt sites are being included without the same level of evidence.

The Council's own evidence shows that the viability of these sites is unclear, which raises concerns about whether they can actually be delivered.

If it is not clear that these sites can be delivered, the plan cannot be considered effective.

There is no clear or confirmed plan for how healthcare services will cope with the increase in population.

Local GP surgeries are already at or beyond capacity, and the modifications do not provide a deliverable solution to this. It is obvious that no investigation has been carried out to discover the effects of a growth in local population on our health needs.

The plan states that solutions will be worked out later, but does not show how healthcare will actually be delivered.

Saying that services “may be expanded” is not the same as having a funded and deliverable plan.

The impact of multiple developments on the same local services has not been properly considered together.

When combined, these developments will place significant additional pressure on already stretched services.

SITE SPECIFIC ARGUMENTS (SES30)

Safe and suitable access for this development has not been demonstrated.

Transport assessments are incomplete, meaning traffic impacts are not properly understood.

There is no clear evidence showing how required biodiversity improvements will be achieved.

The number of homes expected does not match the real constraints of the site.

Green Belt is being released based on a school and burial ground that are not confirmed.

If these uses are not delivered, the land could be used for more housing, which undermines the original justification.

SITE SPECIFIC ARGUMENTS (SES29)

The actual buildable area is significantly lower than the Council assumes.

There are major constraints such as contamination and mining risk that have not been fully assessed.

Access and infrastructure requirements are not confirmed or funded.

Ecology evidence is incomplete or outdated and should

For these reasons, I consider the Main Modifications to be unsound.

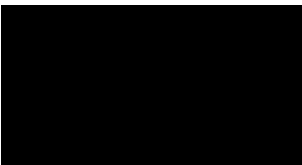
The plan is not justified by sufficient evidence and is not effective in practice.

There is no clear, deliverable plan to support this level of development.

I request that these sites are removed from the plan and remain Green Belt.

Kind Regards

Brian Richard Trinder



REF5.0281

MM410 & MM411

From [REDACTED]
Date Mon 2026-05-04 11:21 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

I object to the proposed green belt building of houses for the following reasons.
Not enough schools.
Not enough doctors.
Increased traffic.
Already overstretched Gp surgeries.
Local flooding to the area that the main entrance to the new estate will be.
It seems crazy to add an extra 2000 houses to an already overstretched under resourced area.
I feel the increased population and loss of green spaces will impact severely on people mental health.

For these reasons, I cannot understand how the council can continue with this plan.

Regards
Karen Bloom

[REDACTED]

[REDACTED]

REF5.0282

Re: Automatic reply: local plan modifications SES29 SES30

From 

Date Mon 2026-05-04 11:28 AM

To SheffieldPlan <sheffieldplan@sheffield.gov.uk>



To Whom it may concern

Would it be possible to disregard my last email and amend my objection to the below comment:

To the Planning Inspector,

Re: Main Modifications MM410 (SES29) and MM411 (SES30)

I write to formally object to the proposed Main Modifications MM410 (SES29) and MM411 (SES30) relating to the release of Green Belt land within the Local Plan.

The inclusion of Green Belt sites is, in my view, unsound. The Integrated Impact Assessment (IIA) acknowledges that development on Green Belt land results in the permanent loss of greenfield sites. This loss will have adverse impacts on biodiversity, place additional strain on public transport infrastructure, and increase reliance on private vehicles, thereby contributing to environmental degradation.

The proposed “Green Belt Golden Rules” lack clarity and precision. As currently presented, they are insufficiently defined and do not demonstrate how the required standards will be achieved within MM410 and MM411. Although site-specific policies require compensatory improvements and sustainable infrastructure, these matters are deferred to the planning application stage. This approach is inadequate. Infrastructure provision should be secured in advance of development to ensure that existing communities are not adversely affected. At present, local infrastructure is already operating at or near capacity, particularly in areas where recent housing developments have been delivered. Without prior investment, further development risks placing unsustainable pressure on these services.

There is evidence to suggest that the proposed developments will exacerbate existing pressures on local schools, many of which are already oversubscribed. While expansion is identified as a potential mitigation measure, there is no clear or detailed strategy for its delivery. Significant concerns remain regarding the availability of teaching staff, the capacity to accommodate increased demand for Special Educational Needs (SEN) provision, and the physical constraints on expanding existing school sites. Furthermore, increased demand for school transport, particularly for pupils with SEN, will place additional strain on an already overstretched system.

Transport considerations have not been adequately addressed. In particular, the absence of a tram-train connection to Waverley undermines assumptions regarding sustainable transport provision and is likely to result in increased car dependency.

The Habitat Regulations Assessment (HRA) is also deficient. While it acknowledges the potential for increased pressure on protected habitats, it relies on mitigation measures that are not yet defined and are deferred to a later stage. This introduces a high degree of uncertainty. Where mitigation is necessary to render development acceptable, it should be clearly identified and secured at the plan-making stage.

Ecological evidence is incomplete. Only one ecology survey has been undertaken for SES30, and no equivalent assessment has been carried out for SES29. Both sites contribute to an important ecological network in the South East, and their development would result in habitat loss and fragmentation. The loss of ecological corridors would restrict wildlife movement, increasing the risk of injury and long-term population decline. Such impacts are unlikely to be fully mitigated.

There are also significant concerns regarding ground stability. No comprehensive mining risk assessment has been provided, despite available data indicating a high level of risk in the MM410 area. Development without a full understanding of mine shaft locations presents a serious risk of subsidence and sinkholes. In addition, both sites are subject to potential flooding from underground springs. Although Sustainable Drainage Systems (SuDS) are referenced, their implementation may reduce the developable area, thereby undermining housing delivery targets and weakening the justification for Green Belt release.

The loss of prime agricultural land is a further concern. Recent surveys indicate that land within the S13 area is of high agricultural quality. In the context of increasing pressures on food security, the protection of such land should be prioritised. Alternative sites, including land in Dore owned by Sheffield City Council, appear to present fewer constraints and offer greater potential for infrastructure provision.

In summary, the proposed modifications rely excessively on matters being deferred to the planning application stage, creating unacceptable uncertainty and risk. The cumulative impacts on biodiversity, infrastructure capacity, public safety, and environmental sustainability are significant.

I therefore respectfully request that these sites be removed from the Local Plan. Priority should instead be given to the effective use of brownfield land. Where appropriate, higher-density development should be encouraged in sustainable locations.

Yours faithfully,
Danny Allsebrook

On Thursday, April 30, 2026, SheffieldPlan <sheffieldplan@sheffield.gov.uk> wrote:

Thank you for your email.

Sheffield Plan – Main Modifications Consultation

The period for representations will run for 9-weeks from Monday 2nd March to 5pm Tuesday 5th May 2026. Thank you for your representation. This email confirms receipt of your representation.

Sheffield Plan General Enquiries

If your email is a general enquiry then we will pass it to the relevant planning officer who will provide you with a response in due course.

Kind regards

Strategic Planning

Planning Service

Sheffield City Council

Data Protection

With the exception of representations focused solely on the Additional Modifications, all representations will be forwarded to the Inspectors examining the Sheffield Plan. To ensure an effective and fair examination, it is important that the Inspectors and other participants in the examination process know who has made representations on the Plan - therefore it is necessary to include the names of all respondents.

Please do not include identifying or sensitive information within the body of your response as we are not asking for this. For example: please **do not** include your address or street, names of others or details of anyone's health, ethnicity, family situation or similar information that could lead to people being identified.

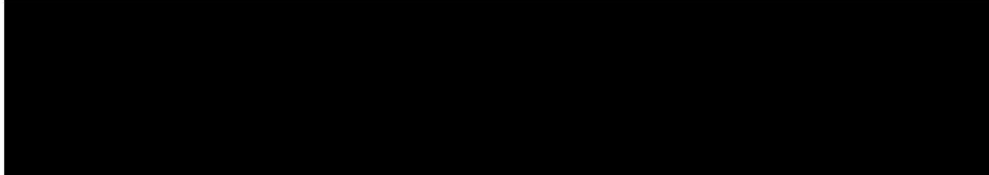
The information you provide (including your name and contact details) will be kept in accordance with terms of the Data Protection Act 2018 and will only be used for the purpose of the Sheffield Plan consultation and examination. Sheffield City Council is the data controller for the information on this form for the purposes of the Data Protection Act 2018.

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REF5.0283

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

From [REDACTED]
Date Mon 2026-05-04 11:46 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.

Yours sincerely,

Rachel Patrick



REF5.0284

Green Belt Development NWS31 ("Horsefield") Letter of Objection

From [REDACTED]

Date Mon 2026-05-04 12:05 PM

To [REDACTED]

External email

See below my letter of objection to the NWS31 Sheffield Plan.

Regards,
Brendan Gillespie

From: Brendan Gillespie [REDACTED]

Sent: 02 May 2026 22:51
[REDACTED]

Dear Councillors,

I am writing to formally object to the proposed allocation of site NWS31 (commonly known as “The Horsefield”) in the Sheffield Plan.

My objection is based on the two key tests required by the Planning Inspectorate: whether the proposal is legally compliant and whether it is sound. I do not believe this proposal meets either requirement.

1. The Plan is Not Sound

Under national planning policy, site allocations must be justified, deliverable, and consistent with national policy. The proposed development of NWS31 fails these tests.

Firstly, there are clearly more suitable alternative sites available across Sheffield, including brownfield land and less environmentally sensitive areas. Allocating this site, despite these alternatives, is not justified.

Secondly, the estimated housing capacity appears significantly overstated. While the Council suggests 103 homes could be delivered, constraints including flood risk, protected habitats, steep topography, and required buffer zones would reduce the realistic capacity to approximately 30–40 dwellings. This raises serious concerns about whether the allocation is effective or deliverable.

Thirdly, the development is unlikely to be financially viable. Policy requirements for affordable housing (approximately 30%) would render the scheme unprofitable based on local market conditions and build costs. This undermines the deliverability of the site.

Furthermore, the proposal would result in substantial harm to valued green space, wildlife corridors, and nearby ancient woodland. It would also negatively affect the setting of Glen Howe Park, a recognised heritage asset. Such harm has not been adequately justified, contrary to national planning policy.

Finally, the site suffers from poor infrastructure provision. Public transport access is limited, and there are no funded or detailed plans to improve infrastructure. Development here would increase car dependency and require new access roads, further undermining sustainability.

2. The Plan is Not Legally Compliant

The proposed allocation of NWS31 appears to conflict with several legal and policy requirements.

The site is located adjacent to a functional floodplain and near a major flood defence scheme. Developing this land risks increasing flood risk and may conflict with the Flood and Water Management Act 2010, which requires authorities to manage and mitigate such risks.

In addition, the proposal does not adequately address environmental protections. The site includes important habitats such as hedgerows and supports protected species. Under the Environment Act 2021 and the National Planning Policy Framework (NPPF), development must deliver measurable biodiversity net gain and avoid harm to protected species. It is not clear how this could be achieved on this constrained site.

The development would also harm the setting of Glen Howe Park. Under the Planning (Listed Buildings and Conservation Areas) Act 1990, any harm to heritage assets must be clearly and convincingly justified. This has not been demonstrated.

Finally, the loss of this accessible green space may disproportionately impact older residents, disabled individuals, and those with health conditions who rely on it. Without appropriate mitigation or replacement, this raises concerns under the Equality Act 2010 and the Public Sector Equality Duty.

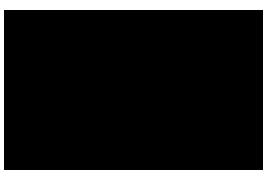
For the reasons outlined above, I respectfully request that site NWS31 be removed from the Sheffield Plan. The proposal is neither sound nor legally compliant and would result in significant and unjustified harm to the local community and environment.

We are appalled by the fact that the majority of councillors in this area have in principle agreed to the plan ignoring all the representations by the local community they have been elected to serve.

Thank you for considering our representation.

Regards,

Brendan Gillespie




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REF5.0285

Representation on Main Modifications MM410 and MM411

From [REDACTED]
Date Mon 2026-05-04 12:11 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

 1 attachment (16 KB)
SES30 MM411 Objection Final.docx;

External email

See attached doc and please confirm receipt

Regards

Calum

FORMAL OBJECTION TO THE SHEFFIELD LOCAL PLAN

Main Modifications – Examination Stage

MM411 | SES30 – Land between Bramley Lane and Beaver Hill Road, Handsworth

Submitted by	Calum Bond
Address	
Email	
Modification reference	MM411
Site reference	SES30 – Land between Bramley Lane and Beaver Hill Road, Handsworth, S13
Submitted to	SheffieldPlan@sheffield.gov.uk
Deadline	5pm, Monday 14 April 2026

1. Introduction

I am objecting to Main Modification MM411 — the proposed allocation of SES30, the agricultural fields between Bramley Lane and Beaver Hill Road in Handsworth, for 827 homes, a secondary school, a multi-faith burial ground, and the permanent removal of this land from the Green Belt.

I live at [REDACTED] I walk these fields. So do my neighbours. So do hundreds of people from Handsworth every single day. These are not abstract green dots on a planning map. They are part of where we live.

But this objection is not just about how much we value this land, though we do. It is about the fact that this allocation is built on contradictory evidence, an impermissible procedure, and a series of legal failures. It should not be in this plan. I ask the Inspectors to direct that SES30 be removed and retained permanently as Green Belt.

2. This Allocation Should Never Have Been a Main Modification

SES30 was not in the plan when it was submitted for examination. It has been introduced now, at Main Modification stage, as if it were a correction to an existing allocation. It is not. It is a brand new proposal for one of the largest sites in the entire plan — 36.55 hectares, 827 homes, a school, a burial ground — and it has bypassed the full Regulation 18 and 19 consultation process to which this community was entitled under the Town and Country Planning (Local Planning) (England) Regulations 2012.

That is not a technical quibble. It means thousands of local residents never had the proper opportunity to respond to this proposal at the stage when it mattered most. To make matters worse, over 100 relevant examination documents were published after the consultation

period had already opened, making it impossible for residents to engage on an informed basis even within the flawed window they were given. This procedural injustice is, on its own, sufficient grounds to reject MM411.

3. Legal Compliance

Environmental Assessment Regulations 2004

The law requires the Council to demonstrate that all reasonable alternatives to a proposed allocation have been properly identified and assessed. The Integrated Impact Assessment and Habitats Regulations Assessment contain no site-specific evaluation of SES30. The Council cannot show — as the Regulations require it to — that this is the least harmful option available. This is a direct breach of the Regulations and renders the allocation unlawful. It is particularly difficult to reconcile with the Council's own claim that it pursued a brownfield-first strategy and exhausted all available brownfield land before turning to the Green Belt.

The Duty to Cooperate

The Duty to Cooperate under the Planning and Compulsory Purchase Act 2004 is a legal test, not a box-ticking exercise. The Council has not produced adequate evidence of meaningful engagement with neighbouring authorities — specifically Rotherham, whose boundary lies close to this part of S13 — on whether cross-boundary housing solutions could reduce the pressure on Handsworth's Green Belt. Without that evidence, this legal test fails.

Wildlife and Biodiversity Law

No protected species surveys were carried out on SES30 before it was allocated. This is not a minor omission. The Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017 impose clear obligations. The Habitats Regulations Assessment has not demonstrated the absence of adverse effects on protected sites. Meanwhile, MM184 removes the requirement to carry out soil surveys on Green Belt land before it is allocated for development — removing a safeguard at precisely the point it is most needed.

Flood Risk and the Sequential Test

The Level 2 Strategic Flood Risk Assessments now published for SES30 confirm that flooding is a real and material constraint on this land. The site contains natural springs and watercourses, and the ground has been disturbed by historic mine workings beneath it. The NPPF and the Flood and Water Management Act 2010 require the Sequential Test — and, where appropriate, the Exception Test — to be applied before land with these characteristics is allocated for housing. There is no adequate evidence in the examination documents that this has been done. That makes the allocation unlawful.

4. The Four Tests of Soundness Are Not Met

Not Positively Prepared

The Inspectors' February 2025 letter asked for additional land for 3,539 homes. That request does not automatically justify Green Belt release — it requires the Council to show that less harmful alternatives have been properly exhausted first. The submitted plan made no Green Belt allocations at all. The Council's own ecological assessment of SES30 suggested the land might be better suited to national biodiversity schemes than to housing.

What concerns me most, though, is where the burden has fallen. Handsworth is being asked to accommodate 1,738 new homes on Green Belt land. That is over 40% of all the Green Belt housing in the entire city of Sheffield, concentrated in one corner of the south east. Meanwhile the Council acknowledges that 96% of Sheffield's Green Belt will remain untouched. No justification has been given for why this community carries such a disproportionate share. If this plan is adopted as drafted, Handsworth will be swallowed into a continuous urban sprawl stretching toward Rotherham. That is not a plan. That is an injustice.

Not Justified: The Council's Own Archaeology Evidence Contradicts Itself

The case for SES30 rests on a suitability assessment in EXAM 130 that rates the site as having 'little or no archaeological constraints'. That low rating feeds directly into the site's overall 'green' score and underpins its assumed housing yield. It is wrong, and the Council's own documents prove it.

EXAM 127 — produced by the Council at the Inspectors' own direction — records cropmarks of possible Iron Age–Romano-British origin across the site, visible from aerial photography. Cropmarks are the surface signature of buried features — ditches, enclosures, field systems, buildings — that survive below the plough line. They are a well-established and reliable indicator of significant buried remains. EXAM 127 also records buried remains of archaeological interest across a wide area of the site, notes that limited historic ground disturbance means those remains are likely to survive in good condition, rates their potential significance at up to 'moderate', and concludes that development would require the exclusion of areas of archaeological importance from the developable footprint.

The 2015 Archaeological Scoping Study — now correctly re-signposted through EXAM 127A, which was produced at the Inspectors' own direction — goes considerably further. It identifies a major archaeological constraint on the site, remains of up to regional significance, good survival of previously unrecorded assets, a potential Iron Age–Romano-British enclosure, and a postulated Roman road along the western edge. It required further evaluation before any allocation was made. That evaluation has still not taken place.

The pattern in the Council's own documents is striking. In 2015: a major constraint. In EXAM 127: an exclusion zone required. In EXAM 130: little or no constraints. In EXAM 161, the Statement of Common Ground: no constraints mentioned at all. There is no new survey data that explains this trajectory. The evidence has not changed — the way it has been presented has. EXAM 127A has put the original evidence back on record, and it exposes EXAM 130 as unsound.

Using EXAM 168 as a guide, the constrained archaeological area covers approximately 3.0 hectares. Remove that from the developable area and the site's housing capacity falls by

around 100 homes — with direct knock-on consequences for viability, infrastructure contributions, and the entire deliverability case. None of this appears anywhere in the Council's evidence base.

Not Effective: The Site Cannot Be Delivered by 2039

On transport: Every vehicle generated by 827 homes, a secondary school, and a burial ground must use Beaver Hill Road. Serious road safety concerns on this road are already on record. The modification itself states that access arrangements are 'subject to further transport assessment'. That is not a plan. It is a placeholder. A site where safe access has not been demonstrated is not a deliverable site.

On heritage: The Cinder Hill Quaker Burial Ground is part of this site. It is on the local heritage list, has been put forward for formal adoption with input from South Yorkshire Archaeology Service, and is currently being assessed by Historic England and Hallam Historic Buildings. Its significance has not yet been fully established. NPPF paragraph 194 is unambiguous: decisions affecting heritage assets must not be made before that significance is properly understood. The original dry stone boundary walls of the burial ground survive in situ and predate 1 July 1948 — they are likely protected curtilage structures that have received no assessment whatsoever, in breach of NPPF paragraphs 199 and 203.

On ecology: The site contains protected trees and hedgerows, some potentially ancient. It sits immediately adjacent to ancient woodland, which the NPPF designates as irreplaceable under paragraph 180(c). The 15-metre buffers proposed in MM411 for the ancient woodland, grassland, and wildlife site at the boundary are not adequate. The 10% biodiversity net gain required under the Environment Act 2021 has not been shown to be achievable here. The Council's own ecological assessment suggested this land was more suited to biodiversity uses than to housing.

On agriculture: These fields have been farmed continuously for centuries. DEFRA data indicates they are likely to qualify as Best and Most Versatile agricultural land — Grade 2 or 3a — among the most productive in England. NPPF paragraph 174(b) requires councils to protect land of this quality. Instead, MM184 removes the requirement to even carry out a soil survey before allocation. You cannot protect what you refuse to measure.

On open space and access: This land is used every day by people from Handsworth for walking, running, and dog walking. The annual Handsworth Hobble takes place here. Public footpaths cross the site and are in regular active use. NPPF paragraph 99 requires that open space of this kind is not lost unless equivalent or better provision is made elsewhere. None has been identified. No mitigation for the footpaths has been proposed.

On viability: The NPPF's Golden Rules require that development on released Green Belt land delivers at least 50% affordable housing, unless this would make the scheme unviable. Sheffield's own draft policy proposes only 30% for this area. That is a direct and unresolved conflict with national policy. Beyond affordable housing, there is no costed and funded plan for the roads, drainage, school places, or GP capacity this development would require. Without one, the allocation is not deliverable in any meaningful sense.

Not Consistent with National Policy

MM411 conflicts directly with the following NPPF provisions:

- Paragraphs 174–182: Greenfield and Green Belt land must be protected unless development is shown to be absolutely necessary. That case has not been made.
- Paragraph 174(b): Best and Most Versatile agricultural land must be protected. These fields are among the most productive in England, and the requirement for soil surveys has been removed rather than complied with.
- Paragraph 180(c): Ancient woodland is irreplaceable. The proposed 15-metre buffers are inadequate.
- Paragraph 99: Open space must not be lost without equivalent replacement. None has been provided.
- Paragraph 167: The Sequential Test for flood risk must be properly applied. It has not been.
- Paragraphs 194, 199, 203, and 205: Heritage assets and buried remains must be fully assessed before decisions are taken. The Quaker burial ground is under live evaluation, the curtilage walls have not been assessed, and no archaeological field evaluation has been carried out despite clear evidence of remains of regional significance.
- Paragraphs 156–159 (Golden Rules): At least 50% affordable housing is required on released Green Belt land. Sheffield’s draft policy proposes 30%. No funded infrastructure plan exists.
- EXAM 197 suggests compensatory Green Belt improvements such as footpath improvements at Shirtcliffe Valley and enhanced access at Flockton Park. These are not adequate or proportionate compensation for the permanent loss of 36.55 hectares of Green Belt farmland in Handsworth.

5. The History and Character of This Land

SES30 is not just farmland. Its history can be traced to the Domesday survey of 1086, and charters referencing these specific fields survive from around 1130. For nearly a thousand years this land has been part of the daily life of people in this part of Sheffield — farmed, walked, and lived alongside. Some of those people are buried here.

The Cinder Hill Quaker Burial Ground lies within or immediately adjacent to the site. It is on the local heritage list, put forward for formal adoption with the involvement of South Yorkshire Archaeology Service, and appears on historic maps across multiple periods. It is currently under active assessment by Historic England and Hallam Historic Buildings. That process is not yet complete. Allocating the site for residential development before it is finished is directly contrary to NPPF paragraph 194.

The original dry stone boundary walls of the burial ground remain standing in situ. They predate 1 July 1948. They are part of the historic curtilage of this site and are very likely to be protected structures under planning law. They have received no assessment in the plan, in breach of NPPF paragraphs 199 and 203. The cropmarks recorded in EXAM 127 point to Iron Age and Romano-British activity beneath the fields. The 2015 Scoping Study identified

remains of up to regional significance and required evaluation before any allocation was made. That evaluation has never happened. NPPF paragraph 205 requires it. The Council has simply ignored this.

Every day, people from Handsworth walk these fields. They run here. They bring their dogs and their children. The Handsworth Hobble has been run here for years. This is community open space in every meaningful sense, and NPPF paragraph 99 protects it. Building on it without providing any replacement provision is contrary to national policy and contrary to common sense.

6. The Housing Numbers Cannot Be Trusted

The figure of 827 homes attributed to SES30 is not reliable. Remove the 3.0-hectare archaeological exclusion zone identified in the 2015 Scoping Study and confirmed by EXAM 127, and the capacity falls by around 100 homes immediately. Add the ancient woodland buffers, the watercourses, the mine workings, the footpath corridors, and the flood-affected areas, and the figure falls further still. None of this has been factored into the housing trajectory or viability calculations.

EXAM 161, the Statement of Common Ground, records no site constraints at all. Not one. That document is supposed to represent an honest, agreed account of what the site can and cannot accommodate. Instead it has no constraints where multiple bodies of evidence confirm there are major ones. That is not an error. It is the logical conclusion of a process that has progressively erased inconvenient evidence from the record. The housing numbers for SES30 should not be relied upon.

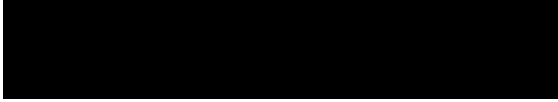
7. Conclusion

I have set out in detail why this allocation is procedurally impermissible, legally flawed, and fails all four tests of soundness. The Council's own documents contradict each other on the site's archaeological constraints. The consultation was undermined by the late release of over 100 documents. The Golden Rules viability requirements have not been met. A heritage asset is being allocated for development while its significance is still being determined. No replacement open space has been found. No funded infrastructure plan exists. And one community — Handsworth — is being asked to absorb over 40% of the city's entire Green Belt housing burden with no explanation of why.

None of these failures are minor or technical. Each one, taken alone, would be serious. Together, they describe an allocation that is not ready, not justified, and not lawful.

I ask the Inspectors to remove SES30 from the Sheffield Local Plan and to keep this land as Green Belt.

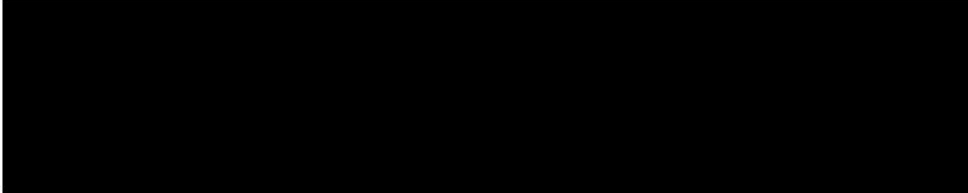
Calum Bond



REF5.0286

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

From [REDACTED]
Date Mon 2026-05-04 12:29 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>
Cc S12 Green Belt <s12greenbelt@gmail.com>



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.

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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,

Chloe Sylvester



REF5.0287

Formal Objection to Main Modification MM410/MM411 – Site SES29 Handsworth Hall Farm

From [REDACTED]
Date Mon 2026-05-04 12:41 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Sheffield Plan Team,

I am writing to formally object to the proposed Main Modifications **MM410** and **MM411**, specifically the de-designation of the Green Belt for site **SES29 (Handsworth Hall Farm)**. I believe the plan is **not sound** for the following reasons:

- 1. Failure to Prove "Exceptional Circumstances":** The removal of this land from the Green Belt has not been sufficiently justified. Brownfield sites within the urban area should be prioritized and exhausted before Grade 2 and 3a "Best and Most Versatile" agricultural land is sacrificed. I believe we should revisit the green belt allocation in 5 years, as circumstances may be different by then and we may not need to use these beautiful spaces.
- 2. Harm to Biodiversity:** The development will lead to the loss of irreplaceable local wildlife habitats. SES29 is known to support protected species, and the proposed "buffer zones" are insufficient to prevent a net loss in biodiversity.
Loss of Priority Habitats: The site contains high-priority habitats including old hedgerows, native grasses, and wildflowers that provide essential shelter and food for pollinators and birds of prey.
Disruption of Ecological Corridors: SES29 serves as a "stepping stone" within the local [Nature Recovery Network](#). Development threatens to fragment these links, isolating wildlife populations and preventing the movement of species like deer and badgers.
Threat to Protected Species: Local surveys and resident sightings have identified several protected or red-listed species on or near the site, including:

- **Birds:** [Barn owls](#), [kestrels](#), [sparrowhawks](#), and [swifts](#).
Mammals: Multiple species of bats, [badgers](#), foxes, and hedgehogs.
Amphibians: Evidence suggests the presence of [newts](#) and [toads](#) in local damp areas and nearby watercourse

- 3. "Unsound Infrastructure Strategy (Policy MM410):**
The allocation of SES29 is unsound because the council has failed to perform a Cumulative Impact Assessment regarding the over 3,500 homes at the adjacent Waverley development. Current infrastructure in [Handsworth](#) is already at capacity; for example, the patient-to-GP ratio is likely exceeding the national average of 2,294:1. Adding 870 more homes at SES29 without a guaranteed and funded expansion of local healthcare and primary schooling—in addition to the already approved Waverley phases—will cause a total failure of local services, in direct contradiction of the 'Golden Rules' for Green Belt release."

- 4. Infrastructure and Traffic:** The plan for SES29 is not sound as it fails to account for the cumulative impact of the over 3,500 homes already built at the Waverley development,

located less than a mile away. The local infrastructure already at a breaking point due to Waverley's growth. Adding a further 870 homes at Handsworth Hall Farm will exacerbate these issues to an unsustainable level, yet the council has provided no evidence of a joined-up strategy to mitigate these **cross-boundary pressures**."

5. **Flood Risk:** This site provides essential natural drainage. Developing this area increases the risk of surface water flooding for existing residents in the S13 and catcliffe area.

- **Point 1:** "The proposal is unsound as the Level 2 SFRA identifies 'extreme' surface water hazards on the site with depths exceeding **1.2m**, yet no cumulative assessment has been done on how this development will increase flood risks for existing S13 residents downstream."
 - **Point 2:** "The plan fails to account for the loss of greenfield 'soakaway' land in an area already significantly hardened by the 3,500+ homes at Waverley, potentially breaching **Policy CC3** regarding sustainable drainage."
6. **Archaeological Significance:** The site is of known archaeological interest. Proceeding with a mixed-use allocation before a full field evaluation is completed puts heritage assets at risk.
- **High Preservation Potential:** Because the site is working farmland that has seen "little or no previous disturbance," experts from the [South Yorkshire Archaeology Service \(SYAS\)](#), predict that archaeological survival on the site is likely to be "**good or moderate**".
 - **Evidence of Regional Importance:** Scoping studies indicate the site contains or is close to archaeological remains of **regional or local importance**.
 - **Irreversible Harm:** Development on this 56.92-hectare site poses a risk of "**irreversible harm**" to the setting and physical integrity of these heritage assets.
 - **Staged Evaluation Required:** The site has been flagged with "**Potential Archaeological Objections**". This means any formal planning application must be accompanied by a detailed **Heritage Statement** and potentially a staged field evaluation (like trial trenching) before any work begins. [[1](#), [2](#), [3](#), [4](#)]

I believe the allocation of **SES29** is unsound as it fails to comply with **Policy NC9**, which prioritises brownfield-first development. Furthermore, the proposal does not meet the 'exceptional circumstances' threshold required under **Policy GS1** and the **NPPF**. The plan also fails to provide adequate assurance that the mandatory 10% Biodiversity Net Gain required by **Policy BG1** can be achieved on this site, nor has it satisfied the heritage protection requirements of **Policy LC1** regarding the site's known archaeological potential.

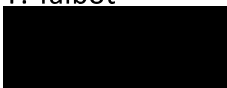
Cumulative Impact Assessment is required regarding the over 3,500 homes at the adjacent **Waverley** development.

I urge the Inspectors to reconsider the release of SES29 and retain its Green Belt status to protect the character and environmental health of Handsworth.

Please acknowledge receipt of this representation.

Yours faithfully,

P. Talbot



REF5.0288

Please copy and paste the below into a blank email.

To: sheffieldplan@sheffield.gov.uk

Subject: Objection to the Proposed Main Modifications to the Sheffield 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 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,

[Your Name]

REF5.0289

Objection to Main Modifications MM410 (SES29) and MM411 (SES30)

From [REDACTED]
Date Mon 2026-05-04 1:18 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Sir/Madam,

I am writing to formally object to Main Modifications MM410 (SES29) and MM411 (SES30) to the Sheffield Local Plan.

This is not a general objection to the Plan, but a specific concern that these Main Modifications are unsound.

In my view, MM410 and MM411 are not justified or effective. They introduce significant changes without sufficient evidence to show that the impacts on existing infrastructure and local communities have been properly understood or addressed.

Local GP services in the area are already stretched, and the supporting infrastructure around them, including parking, is under real pressure. These modifications do not demonstrate how additional demand will be accommodated in a realistic or deliverable way.

Traffic is also already a serious issue. I work around 10 minutes away outside of peak times, but during rush hour my journey takes at least twice as long. The scale of development proposed through these modifications will inevitably worsen congestion, yet there is little detail on how this will be mitigated in practice.

There is also a clear lack of consideration for the impact on green space. One of the reasons we value living in Handsworth is the access to greenery right on our doorstep. It's an important part of our family life — we regularly walk there with our children. The loss or erosion of this space would have a real and lasting impact on how we live and on our children's upbringing.

For these reasons, I do not consider MM410 (SES29) and MM411 (SES30) to be sound, particularly in terms of being justified and effective, and I request that they are reconsidered.

Yours sincerely,

Lauren Walker

REF5.0290

Representation on Main Modifications MM410 and MM411

From [REDACTED]

Date Mon 2026-05-04 1:19 PM

To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

I am writing to share my strong objections to the proposed changes **MM410 (SES29)** and **MM411 (SES30)**. To be blunt, I believe these modifications are **unsound**. The plans just aren't realistic or deliverable when you look at the lack of infrastructure in our area.

Here is why I am objecting:

- **The healthcare "plan" isn't a plan at all:** The idea that we can just "extend" existing GP surgeries to cope with all these new people is honestly poorly thought out. Our local doctors are already at breaking point, and there is physically no room for them to expand their buildings. Without a real, funded plan for new healthcare facilities, adding more houses is just going to leave everyone with worse care and health outcomes.
- **The roads are already a mess:** I see the pressure on our roads every day. It's got to the point where I don't even leave the house during the afternoon rush hour because the gridlock is so bad. I also worry about safety; crossing Rotherham Road to get to Waverley Lake is becoming genuinely dangerous. Adding hundreds of extra cars from these sites is a recipe for disaster.
- **We need our green space:** These areas aren't just "empty land"—they are where our community actually happens. I rely on these spaces for exercise and to see people. It's where I chat with young parents and my older neighbours. If you build over them, you're taking away the one place where we all get together, which is going to lead to more people feeling isolated and again poor health outcomes for people in S13.
- **The Green Belt should be protected:** There aren't any "exceptional circumstances" here that justify building on this land, especially since there is no clear plan for how the local services would even cope.

Im lucky, I can afford to sell up and move to a area with green space but many people can't. It shouldn't be that good health outcomes and nicer places to live with access to green spaces are only available to people who can afford to pay for it.

Of course we need more housing and some of it may have to be built on greenbelt land but not the amount proposed for S13.

Mandy Robertson

REF5.0291

Representation on main modifications

From [REDACTED]
Date Mon 2026-05-04 2:10 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

 1 attachment (17 KB)

Kerry Siddall Objection MM410 MM411 FINAL.docx;

External email

Please see attached objection and confirm receipt.

Regards
Kerry

5 May 2026

Strategic Planning Team
Sheffield City Council
Email: SheffieldPlan@sheffield.gov.uk

FORMAL REPRESENTATION — SHEFFIELD LOCAL PLAN MAIN MODIFICATIONS CONSULTATION

Modification References: MM410 (SES29) and MM411 (SES30)

Sites: SES29 — Handsworth Hall Farm, Finchwell Road, S13 9AS | SES30 — Land between Bramley Lane and Beaver Hill Road, S13

Nature of Representation: Objection — Both modifications are UNSOUND and LEGALLY NON-COMPLIANT

Representor: Kerry Siddall, [REDACTED]

Length of Residence: Over 20 years at the same address

Request: That MM410 and MM411 be removed from the Sheffield Local Plan and that both SES29 and SES30 be retained as Green Belt.

Introduction

I am a resident of Handsworth, Sheffield, and have lived at [REDACTED] for over 20 years. I write to formally object to Main Modifications MM410 and MM411, which together propose to release 91 hectares of Green Belt in S13 for 1,697 new homes, employment land, a school, and a multi-faith burial ground across two sites — Handsworth Hall Farm (SES29) and Land between Bramley Lane and Beaver Hill Road (SES30).

I consider both modifications to be legally non-compliant and unsound under all four NPPF soundness tests. Throughout, the modifications defer resolution of identified problems to future stages rather than demonstrating they are resolved now. A Local Plan must show how harm will be addressed before approval — these modifications do not meet that standard.

Taken together, these two allocations place an extraordinary and unjustified burden on a single community. My grounds are set out below.

Part 1: Legal Compliance — Grounds Applying to Both Sites

1A. SEA Regulations 2004 — Alternatives Not Properly Assessed

The Council has not demonstrated that brownfield alternatives were fully assessed before selecting either SES29 or SES30. The Council's own updated Integrated Impact Assessment (IIA) acknowledges that the modified Plan performs worse for the environment than earlier versions — including negative impacts on land, biodiversity, and transport. This deterioration has not been properly justified. Over 100 supporting documents were published after the consultation had already opened, preventing residents from making properly informed representations.

1B. Duty to Cooperate — Planning and Compulsory Purchase Act 2004

The Council has not demonstrated sufficient cooperation with neighbouring authorities on cross-boundary housing need. Cross-boundary alternatives to Green Belt release in S13

have not been adequately explored. The Duty to Cooperate is a legal test — the Plan cannot be adopted if it has not been met.

1C. Inadequate Consultation — Regulations 18 and 19

Key documents were published after the consultation began, making the process procedurally unfair. The appropriate response would be a fresh Regulation 18/19 consultation, not to proceed on an incomplete evidential basis.

1D. Main Modifications Cannot Introduce New Major Allocations

Main Modifications may only make changes necessary for soundness. MM410 and MM411 together introduce two brand new major allocations — 91 hectares of Green Belt, 1,697 homes, a school, a burial ground, and 20 hectares of employment land. This far exceeds the permitted scope of Main Modifications and should instead have triggered a new Regulation 18/19 consultation.

Part 2: Soundness — Both Modifications Fail All Four NPPF Tests

The NPPF (December 2024) requires Plans to be positively prepared, justified, effective, and consistent with national policy. Both MM410 and MM411 fail every one of these tests.

2A. Not Positively Prepared

The Council has not demonstrated that less harmful alternatives to either site have been exhausted. The Council's own IIA shows the modified Plan performs worse for the environment than earlier iterations — a regression that has not been explained or justified.

2B. Not Justified

The Council has not provided robust, proportionate evidence that either SES29 or SES30 is the most sustainable option. Key failures include:

- Housing yield is materially overstated for both sites. Neither the archaeological constraint at SES30 (~3ha), nor the contamination, landfill proximity, mining legacy, and ecology constraints at SES29, have been properly deducted from the deliverable area. The numbers do not add up.
- Other Green Belt sites have been removed from the Plan due to insufficient deliverability evidence. SES29 and SES30 are being retained without being held to the same evidential standard.
- Best and Most Versatile agricultural land assessments have not been carried out for either site. All 36.9 hectares of SES29 is farmland. Of SES30's 35.3 hectares, approximately 32.9 hectares is farmland. Together these two sites account for nearly 70 hectares of farmland loss — more than all other housing sites in the Plan combined. The Council has not assessed whether this land includes Grade 3a BMV farmland, the most productive category with the strongest policy protection, before proposing to develop it.
- The Prime Minister stated in Parliament on 7 January 2026 that the Government would not plough through farmland to build houses (Hansard, PMQs). Sheffield's plan proposes to develop approximately 170 hectares of farmland — 73.4% of all Green Belt released — with S13 alone bearing over 43% of the city's entire Green Belt housing allocation. This directly contradicts the Government's stated position.

2C. Not Effective — Neither Site Can Be Delivered Within the Plan Period

Both modifications rely on future assessments and plans rather than demonstrating problems are resolved now.

- Transport: Access for both sites is unresolved. All SES30 traffic must use Beaver Hill Road where serious safety issues already exist, and the Plan itself admits access is subject to further assessment. Access arrangements for SES29's 870 homes and 20 hectares of employment land have also not been confirmed or funded.
- Healthcare: Local GP surgeries — Handsworth Medical Practice and Woodhouse Medical Centre — are already at or beyond capacity. A Freedom of Information request to the NHS confirmed there is no confirmed, funded plan for how primary care will cope with the additional population from these sites. The Council's response that surgeries could be physically expanded with developer funding is an aspiration, not a deliverable plan. The cumulative impact of both sites on the same local services has not been properly assessed together.
- Mental health and wellbeing: The Council's own IIA acknowledges negative effects on mental health and wellbeing from Green Belt loss — in one sentence, with no mitigation. At the same time the plan removes the green spaces that support mental health and increases pressure on overwhelmed GP services. These two impacts together represent an unmitigated public health harm.
- Schools and other infrastructure: No costed, funded infrastructure plan exists for either site to demonstrate how demand from nearly 1,700 new homes will be met.
- Golden Rules: Both modifications reference the NPPF Golden Rules for Green Belt release but do not clearly explain what will actually be delivered, how delivery will be enforced, or what guarantees exist. There are no clear measures to show how any required improvements will be achieved in practice.

2D. Not Consistent With National Policy

- Green Belt (NPPF para. 145): Exceptional circumstances for releasing either site have not been adequately evidenced.
- Biodiversity Net Gain (Environment Act 2021): No protected species surveys were conducted before allocation of either site. A 10% net gain has not been demonstrated. The ecology report prepared for SES29 warned that development on this scale would cause major habitat loss and that it would be difficult to replace what is being lost within the site itself, requiring off-site compensation.
- Open Space (NPPF para. 99): SES30 is actively used for recreation and community events including the annual Handsworth Hobble. No equivalent replacement open space has been confirmed.
- Public Rights of Way: Multiple well-used footpaths on SES30 are unrecorded on the Definitive Map. A formal PRoW claim has been submitted (Sapphire McCarthy Campaign, 2026). Developing the site before resolving these claims risks permanently extinguishing historic routes.
- Flood Risk: The Sequential Test has not been demonstrated as properly passed for either site under the NPPF and Flood and Water Management Act 2010.

Part 3: Site-Specific Objections

3A. SES30 — Archaeology: Fundamental Inconsistency in the Council's Own Evidence

The Council's own examination documents directly contradict each other on archaeology for SES30.

The 2015 Archaeological Scoping Study (re-signposted via EXAM 127A) identifies the top field of SES30 as containing: a major archaeological constraint; remains of up to regional significance; a potential Iron Age–Romano-British enclosure; and a postulated Roman road along the western edge. The Study required further evaluation before allocation.

EXAM 127 (Heritage Impact Assessment) identifies cropmarks of possible Iron Age–Romano-British origin, buried remains in good condition, and explicitly concludes that development requires the exclusion of areas of archaeological importance from development (para. 5.5).

Yet EXAM 130 (the suitability assessment) rates SES30 as having 'little or no archaeological constraints' (p. 42) — directly contradicting both documents. EXAM 161 (Statement of Common Ground) makes no reference to any site constraints whatsoever.

Using EXAM 168 as a guide, the constrained area covers approximately 3.0 hectares — reducing the realistic housing capacity by around 100 homes and undermining viability and infrastructure calculations. The drift from 'major constraint' in 2015 to 'little or no constraints' in EXAM 130 has no evidential basis and renders the allocation unsound.

3B. SES29 — Handsworth Hall Farm (MM410): Additional Specific Objections

SES29 proposes to release 56.9 hectares of working Green Belt farmland at Handsworth Hall Farm, Finchwell Road, for 870 homes and 20 hectares of industrial/employment land — the largest mixed-use site in the Plan. The following specific failings apply to this allocation.

Proximity to historic landfill — contamination risk unresolved

The Sheffield Plan itself acknowledges that SES29 is within 250 metres of a historic landfill site and states that an impact assessment would be necessary to determine the effect of nearby Environment Agency waste permit sites. The Plan also acknowledges the potential for contaminated land. None of these assessments have been completed. Sheffield's industrial legacy — coal mining, coking works, and heavy industry — has left a well-documented legacy of ground contamination across the east of the city. The proximity of this specific site to a known landfill is a material unresolved constraint that directly affects both the deliverability and the viability of the allocation.

Mining legacy — ground stability not assessed

The Handsworth/Orgreave area has a deep history of coal mining. Orgreave Colliery — less than a mile from the SES29 site — operated from 1851 until its closure in 1981, with underground workings extending across the wider area (Durham Mining Museum; Wikipedia: Orgreave Colliery). The Sheffield Plan acknowledges the potential for mining-related ground conditions to affect development, but no specific ground stability or mining risk assessment for SES29 has been completed at allocation stage. Until this is done, the developable area and the viability of the site cannot be properly established.

Ecology — major habitat loss acknowledged but unresolved

SES29 is a working farmland site containing hedgerows, small areas of woodland, watercourses, ditches, and a pond — features that form part of a living agricultural landscape and provide ecological connectivity across the area. An ecology report prepared for the land explicitly warned that development on this scale would cause major habitat loss, and that it would be difficult to replace what is being lost within the site itself, meaning compensatory habitat would need to be provided elsewhere (Save S13 Green Belt, citing the ecology report, 2026). No plan for how or where that off-site compensation would be delivered has been confirmed. The Council has not demonstrated how a 10% net gain in biodiversity could be achieved for SES29 as required by the Environment Act 2021. No protected species surveys were conducted before the site was allocated.

The employment allocation adds further unresolved pressure

The 20 hectares of employment land proposed at SES29 is entirely on farmland. This is additional to the housing allocation and is not contingent on it — it represents a separate and significant land use with its own access, infrastructure, and transport requirements. The Plan offers no assessment of the combined traffic impact of 870 homes plus a 20-hectare

business park sharing the same access network. This cumulative infrastructure burden has not been adequately addressed.

3C. SES30 — Biodiversity, PRow, and Heritage

No protected species surveys were conducted at SES30 before allocation, contrary to obligations under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017. Multiple well-used footpaths on the site are absent from the Council's Definitive Map — a formal PRow claim has been submitted for three sections of path (Sapphire McCarthy Campaign, 2026) and allocating the site before resolution risks their permanent loss. Two heritage assets adjacent to SES30 — Cinderhill Green and the Cinderhill Quaker Burial Ground — were under formal Local Heritage List assessment in early 2026, confirming historic and community significance not reflected in the Council's suitability assessment.

Part 4: Disproportionate Burden on S13

SES29 and SES30 together account for 1,697 of the 3,906 homes proposed on Green Belt across Sheffield — 43.4% of the city's total Green Belt housing allocation in a single postcode. The two housing sites would result in the loss of approximately 70 hectares of farmland — more than all other housing sites in the Plan combined. Including SES29's employment allocation, S13 loses over 90 hectares of farmland — more than half of all the farmland the Plan proposes to sacrifice city-wide.

This is not equitable. The three communities of Handsworth, Woodhouse, and Stradbroke — as local campaigners have noted — would effectively be merged into a continuous urban sprawl connecting Sheffield to Rotherham, while more affluent parts of the city with access to the Peak District remain untouched. The Council has not provided any justification for why this disproportionate burden falls on S13.

Conclusion

MM410 and MM411 are legally non-compliant and fail all four NPPF soundness tests. They are not positively prepared, not justified, not effective, and not consistent with national policy.

Both modifications defer resolution of problems — transport, drainage, healthcare, biodiversity, contamination, mining risk, archaeology, and housing yield — to future stages rather than demonstrating they are resolved now. That is not sound planning.

SES29 contains unresolved contamination risk, a mining legacy, and a major ecology concern acknowledged in the Council's own evidence base. SES30 contains a direct, evidenced contradiction within the Council's own examination documents on archaeology, with a 'major constraint' downgraded to 'little or no constraints' with no evidential basis.

Local GP surgeries are at capacity with no funded solution. Green spaces that support community health are being removed at the same time. As a resident of S13 for over 20 years, I have watched this community grow. I do not believe these plans have been properly evidenced, fairly distributed, or honestly assessed. I formally request that the Inspectors:

- Decline to recommend MM410 and MM411 as sound and lawful Main Modifications;
- Require sites SES29 and SES30 to be removed from the Sheffield Local Plan; and
- Direct that both sites be retained within the Green Belt and protected from development.

Yours faithfully,

Kerry Siddall



Resident of S13 for over 20 years

Sources and References

Sheffield Examination Documents

- EXAM 127A — Heritage Impact Assessments Additional Sites and SES30 (Action Point 35, EXAM 195): re-signposts 2015 Archaeological Scoping Study; exposes EXAM 130 scoring as unsound
- EXAM 127 — Heritage Impact Assessment: Iron Age–Romano-British cropmarks; exclusion of archaeological areas required (para. 5.5)
- EXAM 130 — Suitability Assessment: rates SES30 as 'little or no archaeological constraints' (p. 42) — contradicted by EXAM 127 and 2015 Scoping Study
- EXAM 161 — Statement of Common Ground: no reference to SES30 site constraints
- EXAM 168 — used to estimate constrained archaeological area (~3.0ha)
- Sheffield City Council, Schedule of Main Modifications (2026) — MM410 (SES29) and MM411 (SES30)
- Sheffield City Council, IIA Update and Addendum (2026) — acknowledges negative environmental and health/wellbeing effects of modified Plan
- Sheffield City Council, IIA Report Addendum: Modifications Consultation (2026)
- Sheffield City Council, Habitats Regulations Assessment Update (2026)
- Sheffield City Council, Level 2 SFRA — SES29 site assessment (S03061) and SES30 assessments (S02502, S03020). <https://haveyoursay.sheffield.gov.uk/sheffield-plan-proposed-additional-site-allocations>
- Sheffield City Council, PRoW Claims Register (November 2025). [sheffield.gov.uk](https://www.sheffield.gov.uk)
- Sheffield City Council, Sheffield Plan — proposed additional site allocations (April/May 2025). [sheffield.gov.uk](https://www.sheffield.gov.uk)

Planning Policy and Legislation

- National Planning Policy Framework (December 2024) — MHCLG
- SEA Regulations 2004 (SI 2004/1633)
- Planning and Compulsory Purchase Act 2004 — Duty to Cooperate (s.33A)
- Town and Country Planning (Local Planning) (England) Regulations 2012
- Wildlife and Countryside Act 1981 (as amended) — including s.53 Definitive Map duty
- Highways Act 1980
- Conservation of Habitats and Species Regulations 2017
- Flood and Water Management Act 2010
- Environment Act 2021 — Biodiversity Net Gain

SES29 — Specific Sources

- Save S13 Green Belt: 'We will not plough through farmland' (2026). saves13greenbelt.org.uk/kier-starmer-farmland — confirms all 36.9ha of SES29 is farmland; references ecology report warning of major habitat loss requiring off-site compensation
- Durham Mining Museum — Orgreave Colliery, Handsworth, Sheffield. [dmm.org.uk](https://www.dmm.org.uk) — confirms colliery sunk 1851, closed 1981, located adjacent to SES29 area
- Wikipedia: Orgreave Colliery — confirms underground workings linking Orgreave and Treeton collieries across the wider Handsworth/Orgreave area
- Save Sheffield's Green Belt: 'Handsworth Green Belt Plans S13' (June 2025). savesheffieldsgreenbelt.com — confirms SES29 is within 250m of historic landfill; confirms potential for contaminated land; notes Barrow Hill railway opportunity

- Sheffield City Council news release: 'Sheffield's Local Plan continues to move forward' (April 2025). [sheffield.gov.uk](https://www.sheffield.gov.uk) — confirms SES29 site description and allocation details

Farmland and Agricultural Land

- PM Sir Keir Starmer, PMQs, 7 January 2026 (Hansard). hansard.parliament.uk
- DEFRA Agricultural Land Classification — Best and Most Versatile (Grade 3a) protection
- Save S13 Green Belt: farmland data table from Council's own site allocation documents. saves13greenbelt.org.uk/kier-starmer-farmland

Healthcare

- Freedom of Information request to NHS South Yorkshire ICB re: GP capacity in S13 (2025–2026)
- CQC records — Handsworth Medical Practice. cqc.org.uk/location/1-542702937
- Woodhouse Medical Centre, Skelton Lane, Sheffield S13 7LY — NHS records

Heritage and PRow

- Save S13 Green Belt: heritage nominations. saves13greenbelt.org.uk/heritage-list
- South Yorkshire Local Heritage List — 13th Round (2026): Cinderhill Green and Quaker Burial Ground
- Sapphire McCarthy PRow Campaign (2026). prow@saves13greenbelt.org.uk

Campaign and Media

- Save S13 Green Belt: saves13greenbelt.org.uk
- Save Sheffield's Green Belt: savesheffieldsgreenbelt.com
- CPRE Peak District and South Yorkshire: cprepsy.org.uk/take-action/sheffield-local-plan/
- The Sheffield Star — multiple articles 2025–2026 as cited above
- Place Yorkshire: 'Sheffield releases shortlist of Green Belt land for development' (April 2025). placeyorkshire.co.uk

REF5.0292

SES30 - Objection to proposed build on our Greenbelt

From [REDACTED]
Date Mon 2026-05-04 2:14 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Sir/Madam,

I am writing to formally express my strong objection to the proposed development on Green Belt land in our area.

I believe it is both unfair and disproportionate that such a significant level of development has been allocated to Handsworth. This proposal places an excessive burden on our community while undermining the very purpose of protected Green Belt land. The loss of this space is not just about land use—it represents the erosion of a greener, cleaner, and safer future for our children.

This development will fundamentally change the character of our village in a way that cannot be undone. It will ruin the environment and sense of community that residents value so deeply, and it risks causing significant distress and lasting mental strain for those who live here. People feel ignored and powerless in the face of these decisions. We had a voice too, and we demand to be heard and taken seriously before irreversible harm is done.

There is already a clear lack of adequate public infrastructure to support existing residents, let alone a large influx of new housing. Access to essential services such as GP surgeries is already strained, and there has been no convincing plan presented to address this shortfall. Additionally, traffic in and around the area is a growing concern, and further development will inevitably make congestion worse, impacting both quality of life and local air quality.

I want to be clear that I am not opposed to all development. I recognise the need for new housing, which is why I am not contesting site SES29. Given the ongoing regeneration of the surrounding area, including Waverley and the addition of a new train station, that site appears far more suitable and sustainable for development.

However, the broader planning process has been deeply disappointing. It feels poorly handled, lacking transparency, and dismissive of residents' concerns. As someone who has previously supported the council's leadership, I feel let down by the way this has been approached and, frankly, ashamed of that support.

I urge the council to reconsider this proposal and take a more balanced, responsible approach that genuinely reflects the needs and concerns of the community.

Yours faithfully,
Katie Hardie

Sent from my iPhone

REF5.0293

Sheffield Plan Consultation

From [REDACTED]
Date Mon 2026-05-04 2:16 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>
Cc [REDACTED]

External email

Dear Sheffield Plan Team,

In addition to the previous concerns we raised we also want to formally object to the proposed Main Modifications **MM410** and **MM411**, specifically the de-designation of the Green Belt for site **SES29** and **SES30**. We believe the plan is not **sound** for the following reasons:

- 1. Failure to Prove "Exceptional Circumstances":** The removal of this land from the Green Belt has not been sufficiently justified. Brownfield sites within the urban area should be prioritized and exhausted before Grade 2 and 3a "Best and Most Versatile" agricultural land is sacrificed. I believe we should revisit the green belt allocation in 5 years, as circumstances may be different by then and we may not need to use these beautiful spaces.
- 2. Harm to Biodiversity:** The development will lead to the loss of irreplaceable local wildlife habitats. SES29 and SES30 are known to support protected species, and the proposed "buffer zones" are insufficient to prevent a net loss in biodiversity.
Loss of Priority Habitats: The site contains high-priority habitats including old hedgerows, native grasses, and wildflowers that provide essential shelter and food for pollinators and birds of prey.
Disruption of Ecological Corridors: SES29 and SES30 serve as "stepping stones" within the local Nature [Recovery Network](#). Development threatens to fragment these links, isolating wildlife populations and preventing the movement of species like deer and badgers.
Threat to Protected Species: Local surveys and resident sightings have identified several protected or red-listed species on or near the site, including:
Birds: [Barn owls](#), [kestrels](#), [sparrowhawks](#), and [swifts](#).
Mammals: Multiple species of bats, [badgers](#), foxes, and hedgehogs.
Amphibians: Evidence suggests the presence of [newts](#) and [toads](#) in local damp areas and nearby watercourse
- 3. "Unsound Infrastructure Strategy (Policy MM410):**
The allocation of SES29 and SES30 is unsound because the council has failed to perform a Cumulative Impact Assessment regarding the over 3,500 homes at the adjacent Waverley development. Current infrastructure in [Handsworth](#) is already at capacity; for example, the patient-to-GP ratio is likely exceeding the national average of 2,294:1. Adding 870 more homes at SES29 and 827 at SES30 without a guaranteed and funded expansion of local healthcare and primary schooling—in addition to the already approved Waverley phases—will cause a total failure of local services, in direct contradiction of the 'Golden Rules' for Green Belt release."
- 4. Infrastructure and Traffic:** The plan for SES29 and SES30 are not sound as it fails to account for the cumulative impact of the over 3,500 homes already built at the Waverley development,

located less than a mile away. The local infrastructure already at a breaking point due to Waverley's growth. Adding a further 1697 homes will exacerbate these issues to an unsustainable level, yet the council has provided no evidence of a joined-up strategy to mitigate these **cross-boundary pressures**."

5. **Flood Risk:** This site provides essential natural drainage. Developing this area increases the risk of surface water flooding for existing residents in the S13 and Catcliffe area.
Point 1: "The proposal is unsound as the Level 2 SFRA identifies 'extreme' surface water hazards on the site with depths exceeding **1.2m**, yet no cumulative assessment has been done on how this development will increase flood risks for existing S13 residents downstream."
Point 2: "The plan fails to account for the loss of greenfield 'soakaway' land in an area already significantly hardened by the 3,500+ homes at Waverley, potentially breaching **Policy CC3** regarding sustainable drainage."
6. **Archaeological Significance:** The site is of known archaeological interest. Proceeding with a mixed-use allocation before a full field evaluation is completed puts heritage assets at risk.
7. **High Preservation Potential:** Because the site is working farmland that has seen "little or no previous disturbance," experts from the South Yorkshire Archaeology Service (SYAS) predict that archaeological survival on the site is likely to be "**good or moderate**".
8. **Evidence of Regional Importance:** Scoping studies indicate the site contains or is close to archaeological remains of **regional or local importance**.
9. **Irreversible Harm:** Development on this 56.92-hectare site poses a risk of "**irreversible harm**" to the setting and physical integrity of these heritage assets.
10. **Staged Evaluation Required:** The site has been flagged with "**Potential Archaeological Objections**". This means any formal planning application must be accompanied by a detailed **Heritage Statement** and potentially a staged field evaluation (like trial trenching) before any work begins. [[1](#), [2](#), [3](#), [4](#)]

We believe the allocation of **SES29** and **SES30** is unsound as it fails to comply with **Policy NC9**, which prioritises brownfield-first development. Furthermore, the proposal does not meet the 'exceptional circumstances' threshold required under **Policy GS1** and the **NPPF**. The plan also fails to provide adequate assurance that the mandatory 10% Biodiversity Net Gain required by **Policy BG1** can be achieved on this site, nor has it satisfied the heritage protection requirements of **Policy LC1** regarding the site's known archaeological potential.

Cumulative Impact Assessment is required regarding the over 3,500 homes at the adjacent **Waverley** development.

I urge the Inspectors to reconsider the release of **SES29** and **SES30** and to retain its Green Belt status to protect the character and environmental health of Handsworth.

Please acknowledge receipt of this representation.

Kind regards,

Nicola and Lee Talbot

Sent from my iPad

REF5.0294

Objection to building houses at Handsworth SES 30 modification MM411

From [REDACTED]

Date Mon 2026-05-04 2:26 PM

To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

[REDACTED]

Dear sirs I am writing as a resident of S13 and live on the very busy [REDACTED] I have previously sent in my objections but I would like to emphasise myself and husbands views .We object to any further development in Handsworth.

We had no control over the very large township being built at Waverley ,there are still many more houses to be built there.This development has caused over subscribing at our local schools,doctors and Dentists who were already full to capacity.

Our main objection has always been the air pollution which has been well over the recommended level for years .The many cars and large industrial lorries coming through Handsworth because of the Waverley development plus the new (unnecessary building of Lidl)has caused hold ups and lines of standing traffic throughout the day .It is well known air pollution is the cause or contributes to cases of cancer ,heart and lung diseases!

We feel very strongly that our limited green fields be left alone to give us respite from the air pollution we are surrounded by and let our children have places to breathe and enjoy without fear of asthma etc .There are many places in the more affluent parts of Sheffield that have fields that could be built upon please make this fair and consider building in those areas instead.

Irene and John Watson

REF5.0295

Representation on Main Modification MM410 and MM411

From [REDACTED]
Date Mon 2026-05-04 2:31 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[REDACTED]

I am writing my objections against, what I believe to be another rushes and ridiculous lot of nonsense by the council for the build on our green belt.

I still can't see a clear, and honest plan on how you expected these two massive build will work in my area.

Already schools are full to capacity.
Already the GPs are struggling to provide a service.
Already the traffic at peak times is getting worse.

I see zero progress in the modification you have mentioned, on dealing with these real life issues.
Something you constantly have been asked by the people who live in these areas.

No safe or suitable site access has even been put forward.
No word on how you will support failing GP practices.

As for your "golden rule" you refer to, what is this??
There is no clear explanation for what will be delivered or how it will be enforced.

Saying services "may be expanded" is not the same as having a funded or deliverable plan.


I'm fed up now of trying to get a GP appointment.
I'm fed up now of having a queue of traffic outside my front door. I certainly can't see how the Sheffield council will care when it's worse during and after the building.

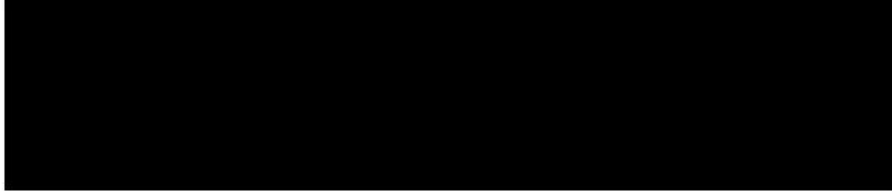
Please, please don't build of our green belt. It needs protecting not demolishing.

Suzanne Elliott

REF5.0296

Representation on main modifications MM410 and MM411

From 
Date Mon 2026-05-04 2:33 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>



Dear sir / Madame

I wish to complain in the strongest terms regarding the S13 plan to redesignate the only green belt in the east side of the city .

I was brought up on the Ballifield estate in the 60s and 70s and we used that land to play , escape from a somewhat dreary existence and discover greenery and wildlife . Despite coming from a relatively poor background, I discovered wildlife there , got into biology, took school seriously & went to university and then taught biology for 42 years. I genuinely think the early introduction to the country side was instrumental in my development.

My other concerns are :

Lack of justification-

this land was protected by green belt designation and is the only green belt in east Sheffield, a predominantly working-class area . I note that no such large scale development is being planned for the wealthier parts of the city .

Environmental Impact:

the loss of habitat for all the wildlife currently using this site . Many bird species nest there , some of which are declining nationally eg Stock doves nest there , as do green finches and song thrushes and several other more common species.

Presently the site acts as large wildlife corridor between many habitats, and this will be massively affected if the only habitat available is the brook .

Also, this is the only green space for people in Stradbroke and Ballifield .

Infrastructure Strain: the increased traffic and pressure on local services will obviously negatively impact local people. It is already very difficult to get a doctor's appointment. The planned road access is laughable.

Increased flooding potential, particularly near the fire station at the woodhouse end and beyond. It floods there most years after heavy rains and with all the concrete covering all the land above I can foresee massive inundation down stream

Please reconsider this ridiculous proposal.
regards , Dave Sheldon

Sent from [Outlook for iOS](#)

REF5.0297

Re Local Plan modifications - objection NES39 MM 353

From [REDACTED]
Date Mon 2026-05-04 2:43 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

 1 attachment (633 KB)

Planning modification NES39 MM353 May 2026.docx;

External email

Good afternoon

With reference to the modification proposal to the Local Plan I have attached my objection to the above site.

I expect this to be fully considered as per the legal requirements for the planning process.

Kind regards

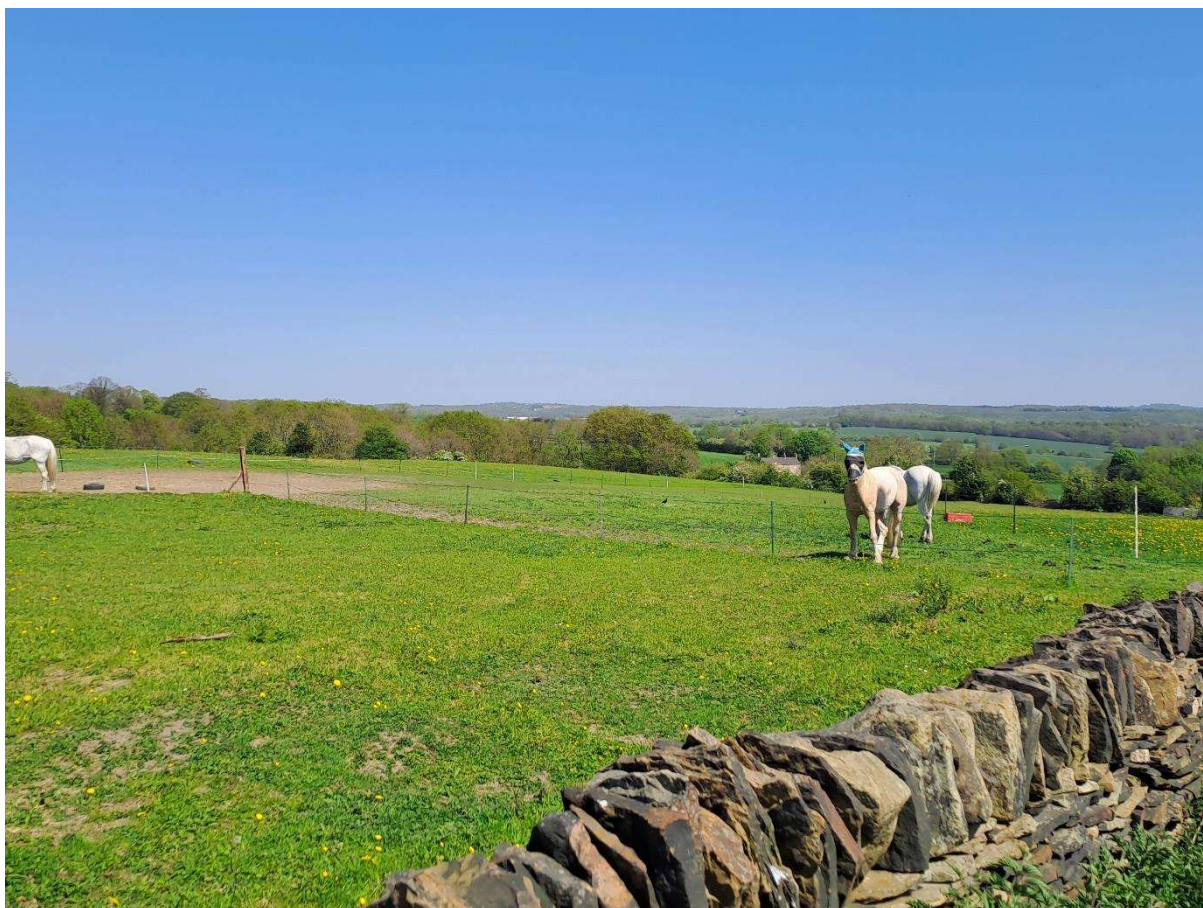
Jane Childs

Planning-Aligned Objection to the Allocation of Parcel A (Wheel Lane / Middleton Lane) NES39

1. The allocation is not consistent with National Planning Policy Framework (NPPF) – Green Belt harm not justified

The NPPF requires that Green Belt boundaries should only be altered in **exceptional circumstances** (NPPF paragraphs 40–142). The Council has not demonstrated such circumstances for Parcel A.

- The Planning Inspectors have already recognised Parcels B and C as “*particularly attractive*” and making a “*strong contribution to the character and setting of the local area*”, with development causing “*significant landscape/visual harm*”.
- Parcel A forms part of the **same uninterrupted landscape unit**, sharing the same valley views, rural openness, and visual sensitivity, as you can see from the photo below, taken from the road.



- Development would therefore result in **the same level of harm** identified by the Inspectors for adjacent parcels. It would also directly impact the adjacent parcels as well as the areas surrounding, providing natural habitats for the local wildlife, including deer, badgers, owls, foxes and amphibians.

- The Council has not provided evidence that this harm can be mitigated, nor that it is outweighed by exceptional circumstances.
- The Plan for mitigation for the loss of the green belt and the environmental harm are so vague as to be totally unclear and therefore unfunded.

In allocating Parcel A, the Plan has not shown how it will meet the Golden Rules requirements.

2. The Plan is not ‘justified’ – Failure to Demonstrate Brownfield First Approach

To be sound, a Local Plan must be justified—supported by proportionate evidence and reasonable alternatives (NPPF paragraph 35b).

The Council has not demonstrated that all reasonable brownfield alternatives have been exhausted:

- The **brownfield register has not been updated since 2019**, meaning the evidence base is incomplete and out of date. NPPF requires local authorities to maintain a Brownfield Land Register, Sheffield Council has clearly failed to do so and is now relying on the green belt to meet national targets. This clearly is a contravention of the NPPF.
- Sheffield contains some of the **largest brownfield sites in the UK**, yet the Plan does not show that these have been fully assessed or prioritised.
- The Council’s own strategy of **Brownfield First**, strongly supported by residents, has not been adhered to or evidenced.

Releasing Green Belt land without an up-to-date assessment of brownfield capacity is inconsistent with NPPF paragraph 125, which requires planning authorities to make **as much use as possible of suitable brownfield land** before considering Green Belt release.

The release of the green belt serves only to benefit the landowner and developers, where brownfield sites would utilise land that has become wasteland providing no environmental, social or community benefits. It would benefit the City of Sheffield which is blighted by many areas of brownfield sites.

3. The allocation is not ‘effective’ – Environmental and infrastructure impacts not addressed

An effective plan must be deliverable and supported by evidence that impacts can be managed (NPPF paragraph 35c). This allocation fails that test.

- Permanent loss of greenfield land would reduce soil function, natural drainage, and carbon storage, contrary to NPPF paragraphs 174–175.

- Biodiversity impacts have not been assessed or mitigated, despite the site forming part of a wider habitat network.
- Wheel Lane is already heavily trafficked; additional housing would worsen congestion, increase air pollution, and reduce safety.
- No transport assessment or infrastructure capacity evidence has been provided to demonstrate deliverability.
- The Golden Rules applies to green belt development and yet there is no

Without robust evidence, the allocation cannot be considered effective.

4. The modifications to the plan is not 'positively prepared' – inadequate consultation and lack of transparency

A sound plan must be positively prepared and supported by meaningful community engagement.

The consultation process for NES39 has not met this standard:

- No clear map of the revised NES39 boundary has been provided, preventing meaningful evaluation.
- Information has been released in a piecemeal manner, limiting the community's ability to understand or respond.
- Hard copies of the modification plans were not made available in Grenoside, despite the area being directly affected.
- The only physical copies were placed in locations with poor transport links and limited opening hours, creating barriers to participation.

This approach conflicts with NPPF paragraph 31, which requires plans to be underpinned by **transparent, accessible, and up-to-date evidence**.

5. Conclusion – The Allocation Fails the Tests of Soundness

For the reasons above, the proposed allocation of Parcel A:

- **Conflicts with national Green Belt policy**
- **Lacks justification due to failure to prioritise brownfield land**
- **Is not supported by adequate environmental or infrastructure evidence**
- **Has not been subject to transparent or accessible consultation**

The allocation therefore fails the NPPF tests of soundness and should be **removed from the Plan**

Jane Childs



REF5.0298

Representation on main modifications MM410 and MM411

From [REDACTED]
Date Mon 2026-05-04 2:59 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Sir or Madam,

I am writing to object to the Sheffield Local Plan Main Modifications, specifically MM410 (SES29) and MM411 (SES30).

We do not believe these modifications are sound. In particular, there does not appear to be a clear or deliverable plan for the infrastructure needed to support this level of development, especially in terms of local healthcare and GP services. From our experience, services in the area are already under significant pressure, and it is difficult to access timely appointments. Adding further demand without a robust and funded plan in place risks making this situation worse.

We are also concerned about the wider impact on local infrastructure, including traffic and the loss of green space. These areas currently provide important environmental and community value, and their loss would negatively affect the quality of life for residents.

The plan is unfair focusing a large amount of the homes in s13 and in doing so taking over 90% of our greenbelt fields. These are historic fields and woods and should be protected at any cost.

Overall, we do not feel there is sufficient clarity on how this development will be delivered in a sustainable way. For these reasons, we believe the proposed modifications are unsound.

We respectfully request that these sites are removed from the plan and remain designated as Green Belt.

Yours faithfully,

Lisa, Steven, Jordan and Zak Ives.

REF5.0299

Objection to Main Modifications MM410 (SES29) and MM411 (SES30)

From [REDACTED]
Date Mon 2026-05-04 3:15 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Sir/Madam,

I am writing to formally object to the Sheffield Local Plan Main Modifications MM410 (SES29) and MM411 (SES30).

These modifications are unsound. They rely on vague future intentions rather than clear, deliverable plans, and fail to demonstrate how the necessary infrastructure will be provided.

Local services are already under significant strain. My GP practice is overwhelmed and cannot cope with current demand, let alone additional population growth. There is no clear, funded or deliverable plan showing how healthcare provision will be expanded to meet this increase.

Schools and nurseries in the area are oversubscribed, and local roads are already under pressure. Traffic is particularly problematic around Beaver Hill Road and the Lidl junction, where congestion is a daily issue. The transport impacts of this scale of development have not been properly assessed or resolved.

The environmental impact is also unacceptable. The loss of Green Belt land will reduce access to vital green space used for walking and recreation, harm local wildlife habitats, and worsen air quality. This has a direct and negative impact on quality of life and mental wellbeing.

Crucially, too many key details are being deferred to later stages. There are no firm guarantees that infrastructure improvements will be delivered, and the plan appears to rely on assumptions rather than evidence. The consultation and feedback process also does not appear to have been properly followed, which further undermines confidence in these proposals.

This is a significant change, not a minor modification, yet it is not supported by sufficient evidence to show it is justified, effective or deliverable in practice.

For these reasons, I consider the Main Modifications to be unsound and request that these sites are removed from the plan and remain designated as Green Belt.

Yours faithfully,
Amanda Taylor

[REDACTED]

REF5.0300

Subject: Objection to Main Modifications MM410 (SES29) and MM411 (SES30)

From [REDACTED]
Date Mon 2026-05-04 3:26 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>



Dear Sheffield Local Plan Team,

I am writing to object to Main Modifications MM410 (SES29) and MM411 (SES30). This objection relates specifically to the Main Modifications and why they remain unsound.

1. The modifications are not justified or effective

The Council's own assessment shows the modified plan performs worse for the environment, including impacts on travel, biodiversity and hydrology. Despite this, the increase in housing numbers has not been properly justified. Key decisions are being deferred to later stages, meaning the plan is not properly justified at this point, as required by national policy.

The "Golden Rules" for Green Belt release remain vague and do not explain how they are applied in practice. Without clear criteria, the justification for releasing Green Belt land is weak and inconsistent.

2. Infrastructure planning remains incomplete and undeliverable

My experience of local GP services is that they are already under severe pressure. It is difficult to get appointments, waiting times are long, and the system is struggling to meet current demand. The Main Modifications still do not show how the Council will deliver the healthcare capacity required for hundreds of additional residents.

There is no modelling, no committed funding, and no evidence of NHS agreement. Leaving these issues to later stages makes the plan unsound, because infrastructure delivery is neither clear nor credible.

3. Traffic, access and loss of green space directly affect me

Traffic in this area is already heavy at peak times, and the proposed development would significantly worsen congestion. The road network is not designed for this scale of development, and the modifications do not provide a deliverable solution.

The loss of Green Belt land affects me personally. These spaces are used for walking, recreation, and as a buffer from noise and pollution. Removing them would have a direct negative impact on my wellbeing and on the character of the area.

4. No evidence the homes will meet local housing need

The Main Modifications do not demonstrate that the proposed homes will actually be available to local families. There are no safeguards to prevent:

- bulk purchase by corporate landlords
- acquisition by companies intending to convert properties into HMOs

- large-scale buy-ups by investment groups
- allocation of units for uses unrelated to local housing need

The absence of any mechanism to ensure the homes serve the community they are being justified for means the plan is not effective and not deliverable.

There is also no clarity on how future national housing policies or accommodation strategies might influence the use of these homes. Without clear protections or allocation criteria, there is a real risk that the development will not achieve its stated purpose. This undermines the justification for releasing Green Belt land.

5. The development strategy is unclear and incomplete

Drainage, access, environmental mitigation and infrastructure delivery are all left unresolved. The modifications do not show how these issues will be addressed in practice. This means the plan is not effective, because it cannot be implemented as written.

Conclusion

For these reasons, I believe Main Modifications MM410 and MM411 are unsound. They are not justified, not effective, and not supported by a clear or deliverable infrastructure plan, particularly in relation to healthcare and housing need.

I therefore request that these sites are removed from the Main Modifications and remain Green Belt.

Kind regards,

Mrs Sarah Timmins