Sheffield Plan Main Modifications

Responses – by email

Reference numbers REF5.0201 to REF5.0250

Reference Number	Respondent Name	Organisation
REF5.0201	Rebecca Johnston	Individual
REF5.0202	Derek Hastings	Individual
REF5.0203	Margaret Melluish	Individual
REF5.0204	Johnrichard Auckland	Individual
REF5.0205	Paul Jannaway	Individual
REF5.0206	Shaun Doncaster	Individual
REF5.0207	Deborah Bellamy	Individual
REF5.0208	Dawn Shaw	Individual
REF5.0209	R Beckett	Individual
REF5.0210	Ian Taylor	Aprica
REF5.0211	Ian Taylor	Aprica
REF5.0212	Haley Spyve	Individual
REF5.0213	Chris Greenwood	Individual
REF5.0214	D Tomkins	Individual
REF5.0215	Paul Ratcliffe	Individual
REF5.0216	Teresa Loxley	Individual
REF5.0217	Tracy Wilson & Carl Brocklehurst	Individual
REF5.0218	D & J Brocklehurst	Individual
REF5.0219	Anita	Individual
REF5.0220	Paul Ratcliffe	Individual
REF5.0221	K Johnson	Individual
REF5.0222	Rebecca White	Individual
REF5.0223	Isabella Gillespie	Individual
REF5.0224	Nigel Dorman	Individual
REF5.0225	Nigel Dorman	Individual
REF5.0226	Martyn Gregory	Individual
REF5.0227	Lynda Jackson	Individual
REF5.0228	Kerry Hicks	Individual
REF5.0229	Adele Lonsdale	Individual
REF5.0230	Josie Saddington	Individual
REF5.0231	Kay & Peter Smith	Individual
REF5.0232	Joe Dunn	Individual
REF5.0233	Lee & Nicola Talbot	Individual
REF5.0234	Angela Cooper	Individual

REF5.0235	Godfrey Pell	Individual
REF5.0236	Alison Bloodworth	Individual
REF5.0237	Caroline Nokes	Individual
REF5.0238	Keith Boldock	Individual
REF5.0239	Katie Jenkins	Individual
REF5.0240	D Smith	Individual
REF5.0241	Emily Dunn	Individual
REF5.0242	Stephen Brough	Individual
REF5.0243	Amanda Finbow Froggatt	Individual
REF5.0244	Debra Dent	Individual
REF5.0245	C Walton	Individual
REF5.0246	M Walton	Individual
REF5.0247	Catherine Barrass	Individual
REF5.0248	Jarrod Radford	Individual
REF5.0249	Bethany Cheshire	Individual
REF5.0250	Helen Crowell	Individual

REF5.0201

Outlook

Sheffield Plan-Consultation on Main Modifications

From [redacted]
Date Fri 2026-05-01 12:10 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

1 attachment (27 KB)
sheffield-plan.docx;

External email

Dear Sir/Madam,
Please find attached my feedback relating to the following document: MM332- Main Modifications for Proposed Site Allocation NWS31.

Kind regards,
Rebecca Johnston

Mrs Rebecca Johnston

[redacted]

To: Strategic Planning

5th Floor, Howden House,

Sheffield, S1 2SH

Email: sheffieldplan@sheffield.gov.uk

Dear Planning Inspector,

We wish to make a representation on the Main Modifications to The Sheffield Plan, and in particular, to modifications specifically relating to site allocation NWS31 (land between Storth Lane and School Lane S35 0DT).

Introduction

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

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

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

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

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

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

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

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

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

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

<u>Loss of Amenity of Green and Open Space</u> *(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 Wharncliffe 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. For families with young children who live at the Green Lane end of the village this park is too far away and involved the crossing of busy roads making it unsafe for younger children to access.
- 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.
- As a society we are facing an obesity epidemic and also a deterioration in people's mental health. The removal of this space impacts directly on both of these issues. Removing green space means less space for children to be active contributing to a sedentary lifestyle. Being

in open green space and exercising are known to benefit people's mental health and wellbeing, the removal of this space will negatively impact people's wellbeing.
- 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.

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
- The site is ecologically different to many surrounding sites as it is meadow rather than woodland. This means that it's removal will have a significant negative affect on biodiversity which cannot be 'mitigated'.

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,

Mrs Rebecca Johnston

REF5.0202

Outlook

[20260501] SWS18 Lodge Moor Road - Representations by SLLMRRC Action Group [Sheffield Plan – Main Modifications Consultation]

From [redacted]
Date Fri 2026-05-01 2:21 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>
Cc [redacted]

2 attachments (1 MB)
20260501-1B-SWS18 - SLLMRRC Representations Schedule of Proposed Main Modifications MM440 - MAR 2026.pdf;
20260501-2A-SWS18 - SLLMRRC Representations on IIA Report Addendum Modifications Consultation - FEB 2026.pdf;

External email

FAO [redacted]
Strategic Planning Services Manager

Dear Sirs

SWS18 Lodge Moor Road - Representations by SLLMRRC Action Group - Main Modifications Consultation

Please find attached two documents ref. 20260501-1B and 20260501-2A, the representations from the SLLMRRC Action Group ref SWS18.

Please can you acknowledge receipt of this email?

Thank you.

Thank you.
Kind regards
Derek Hastings

[redacted]

'SAVE LAND AT LODGE MOOR ROAD
& REDMIRES CONDUIT' ACTION GROUP





Modification MM440

Background

In response to the Documents placed on the Examination web site after the Sheffield Plan Consultations in May/June 2025 and following the Hearing into the proposed Lodge Moor/Redmires Conduit Green Belt Site (Ref SWS18) the Group opposing the development (SLLMRRC) submitted to the Examination a detailed response comprising a summary template and 22 Appendices.

Despite the fact that this submission raised very real concerns about the suitability, deliverability and viability of the Housing proposal, the issues raised have either not been addressed in the Modifications. Furthermore, where the subject matter is included under "Conditions on Development" in Modification MM440, this does not address the SSLLMRC contention that Site SWS18 should be deleted under the three tests referred to above. The assumption seems to be that it is appropriate to defer these tests until a planning application is submitted for the Site. The NPPF in paragraph 77 of the Section "Identifying Land for Homes" emphasises the need for extensions to existing Towns to be well located, supported by the necessary infrastructure and facilities including a genuine choice of transportation modes. This means ensuring these requirements are met before the land is allocated for development. Clearly this has not happened as the Consultants for Ackroyd and Abbott indicate in their submission to the Examination (EXAM 164)

The particular infrastructure, community and environment constraints as set out in Appendices to the Template are summarised below. These should have been addressed before confirming the allocation of Site SWS18 in Modification MM440 and setting out the Conditions on Development.

Appendices 1, 4, 5, 12, 13 and 14: Flooding and Drainage. How will the Developers and Yorkshire Water resolve the surface Water flooding which is occurring more frequently on Site SWS18 and downstream. The question to be answered at the Local Plan stage Plan Stage: What is the solution to the current and long term flooding problems and is it economically viable and deliverable?



The 300 mm surface water drain serving the former hospital site crosses Site SWS18. Given the pumping arrangements to Crimicar Lane and the need for a drainage solution for SWS18 what is the solution and is it economically viable?

Appendices 2 & 14: Highways and Transport

How will the Developers and City Council provide the offsite improvements to Lodge Moor Road and its junction with Blackbrook Road. Issues related to land in private ownership have not been addressed. Improvements to public transport and active travel have not been addressed. Are the offsite highways and transport requirements feasible, economically viable and deliverable?

Appendix 19 Exolum Pipeline: The Oil Pipeline exclusion requirements for development of the Site have been specified in detail in correspondence between SLLMRRC and Exolum, as set out in Appendix 19. This supersedes previous correspondence between Sheffield City Council and Exolum. The wider requirements in Appendix 19 are not included in MM440, which still identifies a lesser exclusion zone. What are the implication for the deliverability of the housing capacity (258 dwellings) in MM440 given the trajectory of the Oil Pipeline across the Site and the wider exclusion zone?

Appendices 3 & 9: Community Facilities:

Necessary improvements to community facilities are identified in these Appendices, including local health provision at the Lodge Moor GP Surgery. This has not been addressed in Modification MM440. Nor has any additional education capacity requirements. What is the evidence that meeting these requirements is feasible, deliverable and economically viable?

Appendix 16: Grey Belt:

The requirement to identify Green Belt/Grey Belt Sites before other Green Belt Sites, as required by NPPF 24 and pointed out in the Inspector's letter to the Council in February 2025, has not been considered by the City Council. The Plan follows the requirements in respect of the "Golden Rules" but not the provisions requiring Grey Belt/Green Belt Sites to be proposed for development before other Green Belt Sites. This inconsistent



approach means the Plan is selective in whether current NPPF Policies are followed and is therefore not Sound.

Appendices 1, 6, 10 & 11: Green Belt, Landscape/Countryside and Open Space:

Modification MM440 does not reflect he Green Belt purpose of the Site and the value of the Site as part of the wider landscape has not been recognised.

The full impact the development will have on the recreation and wildlife importance of the adjoining Redmires Conduit, which is a designated Heritage Site and Local Wildlife Site, is not reflected in Modification MM440. The requirements of NPPF 2024, Paras 156c and 159 relating to the "Golden Rules", have not been met. The proposed modifications to Policy NC 15 and MM440 do not set out clear and precise requirement for the provision of open space/green space on Site SWS18. These requirements are not deliverable based on the Modifications to the Plan. (see suggested changes to modification to Policy NC 15)

Appendices 17, 18 & 22 Housing: The Council has sought to follow to the letter the "Golden Rules" on affordable housing and proportions and the mix of types of affordable housing. In overall terms the Appendices illustrate that "one size fits all" does not meet local circumstance. First the nature of requirements is changing, for example the fall in demand for student housing and second the way in which sites within the urban area, especially brownfield sites, are increasingly being developed for family housing. This is increasingly being facilitated by Government funding assistance. In the case of Site SWS18 disagreement between the Council and the potential developers over the mix of affordable housing illustrates this point and makes this element of the Plan not deliverable.

<u>Conclusions from the SLLMRRC Template and Appendices</u>

The key issues and objections in the detailed Template and Appendices submitted to the Examination by SLLMRRC in December 2025, and summarised in this Representation, have not been responded to by Sheffield City Council and are not reflected in MM440. In view of this and findings in the IIA Report Addendum Modifications Consultation that the Modified Plan performs less well in a number of topic areas, (see



representations of SLLMRRC on the latter Document) **the Plan fails and is not Sound because:**

a) The Overall Strategy in Part 1 of the Sheffield Plan seeks to ensure that all Brownfield Sites suitable for housing are proposed for development before Green Belt Sites are released. It has been demonstrated that this requirement has not been met;

b) The Plan has not considered other Green Belt Sites that would, as a priority have been defined as "Grey Belt", had that requirement of NPPF December 2024 been implemented. The suggestion in the Inspectors' letter to the Council in February 2025 that "the Council may wish to "future proof" its Green Belt evidence by identifying and appraising land which is defined as Grey Belt under NPPF 24" has not been implemented. This failure to explicitly undertake the work undermines the credibility of the Plan in respect of the Green Belt Housing Allocations

c) The allocation of Site SWS18 for housing is neither justified by the overall site selection evidence in the Green Belt Appraisal Topic Paper (EXAM 130) nor by its development feasibility, viability and deliverability. There are major constraints on and off site and it has not been demonstrated how, or whether these can be overcome. The Site should therefore not be allocated for housing but should remain in the Green Belt.

However, if the Inspectors judge the Site should remain as a housing allocation, the Conditions on Development in Modification MM440 do not provide thorough and detailed requirements for the development of the Site. The proposed changes set out below are designed to rectify the inadequacy of the proposed Conditions on Development in MM440.

Without these changes it is considered that the Conditions on development would not be effective in delivering the development of Site of Site SWS18 in accordance with the Policies in the Sheffield Plan.

The further modifications proposed to Policy MM440 below are shown in **bold type**.



SPECIFIC COMMENTS ON MM440. INCLUDING CONDITIONS ON DEVELOPMENT

Parts 1 and 2 of the Sheffield Plan contain hundreds of Policies both general and specific on a wide range of subjects. Clearly not all policies apply to all Sites. In order to assist developers and others involved in implementing the Policies in the Plan it is important to include reference in the Conditions on Development to the Policies which are particularly important in the development of a site. This applies especially to the Green Belt Sites proposed for development because of their sensitivity in the wider Green Belt and in the environmental context.

Total Housing Capacity

In MM440 there is no explanation why the housing capacity of the Site is indicated as 258 dwellings.

Constraints on the development of Site SWS18 would reduce the housing capacity of the Site:

Exolum Pipeline: 0.6 ha. Based on an exclusion Zone of 12 metres, this Zone would significantly affect the layout of the housing on the Site due to the loss of developable land and its diagonal position across the Site,

Flood Risk. 1.65ha. NaFRA area of Site at flood risk,

Existing Combined Sewer under Site SWS18. Potential exclusion Zone not quantified by AcAb, the developer. A Build Over Agreement must be secured with Yorkshire Water (YW), or constraints applied to create a buffer zone, potentially greater than +/- 3m, to YW requirements.

10 metre buffer to the Redmires Conduit Local Wildlife/Heritage Site

Site 0.7ha,

Buffer to mitigate views of Site SWS18 from Peak Park not quantified.

Open Space/Green space and landscape protection: not quantifiable due to vague nature of Plan Policy requirements (particularly Policy NC 15}

It is not possible to accurately quantify the area of Site SWS18 which would be for uses other than housing. However, a comparison with the neighbouring development on the former Lodge Moor Hospital Site, built



between 2000 and 2004, provides a useful pointer to what is feasible and likely to be developed on Site SWS18. The key findings show that:

a) The gross area of the Hospital Site is approximately twice the size of Site SWS18;

b) There are 272 dwellings with a mix of housing types on the Hospital Site;

c) The density of housing on the Hospital Site based on an approximate gross area of 18 ha is 15 dw/ha;

d) The density of development on Site SWS18, based on the gross area of 9.20 ha is 28dw/ha;

See Appendix01 - A detailed appraisal by SLLMRRC, at the end of this document.

SGBA Assessment of Housing Capacity on SWS18

The Sheffield Green Belt Alliance (SGBA) has carried out a separate assessment of housing capacity at SWS18 (ref. "SGBA Site Capacity Analysis of Green Belt Sites"). Please refer to this document by separate submission, which states suitable housing numbers of 135-150 homes at SWS18, not 258 as assessed by SCC. Our view as SLLMRRC is 138 homes (as stated above and concluded below).

Conclusions

The development of the former Hospital Site provides a benchmark for the development of Site SWS18, should the latter go ahead.

The assumed capacity of Site SWS18 should be reduced to reflect a density of development comparable to the Lodge Moor Hospital Site. At half the current assumed, but not explained density of Site SWS18, i.e. 15 dw/ha, this would result in138 dwellings.

MM44O: Housing Capacity for Site SWS18 should be changed to 138 dwellings.

This would allow for an extensive amount of Green Space to be provided on Site SWS18, similar to the quantity and type of Green Space which is



provided on the former Hospital Site. This includes substantial areas of amenity and informal recreational space, together with woodland on the southern side of the Development; and a wide Green Space buffer, including a public right of way, on the west side of the Development. The buffer serves a function of mitigating the impact of the Development when viewed from the Peak District National Park.

The above provisions reflect the requirement in paragraph 159 of NPPF 24 for Green Belt Sites proposed for development, i.e. that The improvements in green space provision, required as part of the "Golden Rules", should contribute positively to the landscape setting of the development, support nature recovery and support standards of green space provision where these exist in the Local Plan.

Site SWS18 CONDITIONS ON DEVELOPMENT

Below are set out the proposed changes to the bullet points in MM440. Although not numbered in MM440 they are numbered in the order they are set out in MM440.

Bullet point 1. Add after National Planning Policy Framework, **including paragraph 156c and 159**. Add after Policy NC 15 *(as modified)**** and GS1** (*as modified)*

***Further modifications to MM147 (Policy NS15 are required: The Conditions on Development wording for green belt release sites should be further modified to make clear that the Policy NC15 exceptions do not apply to land released from the Green Belt, or alternatively that a minimum on-site open space provision is required on such sites as a direct consequence of the Golden Rules, This should be independent of Policy NC15's general quantitative assessment of existing local provision.**

MM147 should be further modified to clarify that SuDS infrastructure should not count toward the minimum open space requirement unless it provides genuinely accessible, usable recreational green space throughout the year.

Bullet point 2. Add after "Green Belt". **In accordance with Policy NC3** *(as modified)* **a minimum of 40% of the gross internal floor area of the development of Site SWS18 will be required for affordable**



housing. The tenure mix will be decided as part of the master planning of the Site and will be in accordance with Policy NC8, NC9c and DE1 (housing space, housing density and the local Context and Development Character of the Site).

Bullet point 3. Delete words **or successor documents.** Then add -

These Compensatory Improvement opportunities are:

- **Rights of way improvements within the local area, including surface improvements to SHE498 and 499 (the Conduit) and active travel links through Spider Park.**
- **Maintenance and repairs to the structural integrity of the Conduit.**
- **Improvements to the playground, sports facilities and paths at Spider Park.**
- **Playing pitch improvements, woodland management and car park and access infrastructure at Redmires Playing Field and Woodland.**
- **Improvements and maintenance of the easy access public footpath linking the Conduit public footpath to Soughley Lane and Redmires Reservoirs** (Suggested addition)

Bullet point 4. Add after "Lodge Moor Road":

The Transport Assessment should include:

- **Any required improvements to the Strategic/Local Road Network;**
- **Improved public transport accessibility to/from the Site;**
- **The feasibility of meeting required national standards in respect of a) widening Lodge Moor Road from its junction**



with Blackbrook Road; and b) improving the sub-standard junction between Lodge Moor Road and Blackbrook Road;

Bullet point 5. No change

Bullet point 6 Add after "flood risk"**, including flood risk**

Add after "the level 2 SFRA site assessment" **and other assessments,**

delete words **at or** before the words "before the planning application stage"

Bullet point 7. Insert **Development of the Site should be in accordance with Policies GS5 and GS6** (*as modified*) before "Explore opportunities". Add after "the BNG hierarchy: **This means providing a biodiversity net gain of at least 10% on the Site. A landscaping plan should be drawn up to reach a 10% net gain in habitat and linear units. Any habitats that are retained, enhanced or created for the purposes of biodiversity must be committed in a 30 year management and maintenance plan**. **Once all options have been considered and the provision of BNG on the site has been maximised, offsite compensation will then need to be considered to deliver any shortfalls.**

Bullet point 8. Delete **a minmum10 metre** and insert **a minimum 15 metre buffer**. Insert before "**a minimum 15 metre buffer**" **Development should be in accordance with Policy GS 5.** (to accord with minimum buffer widths for Local Wildlife Sites on other proposed Green Belt Development Sites and to refer to Policy GS 5) Add at the end of the bullet point after "development": **Master planning of the Site should include provision for management and maintenance of the Local Wildlife Site/Redmires Conduit Watercourse.**

Bullet Point 9. After Policies NC1, add **GS3 and DE1,**

Bullet point 10. Add after "impacting on Heritage Assets**", in particular the Redmires Conduit.** Delete **and due consideration should be given to the impact of any proposal**. Insert **The impact of any proposal should be assessed in accordance with Policy DE9 in a Heritage Statement, prior to the submission of any planning application.** Add at the end of bullet point 10 **.Master planning of the Site should include measures for the management/maintenance**



of the Redmires Conduit Heritage Site. The Heritage Statement should explain how potential archaeological impacts have been addressed. This will need to be informed by the results of a staged archaeological evaluation with results addressed by design of the Scheme. The resulting development project can then avoid or minimise harm to the significance of identified archaeological and heritage assets or their setting

Bullet Point 11. Add at the beginning: **In accordance with Policy GS3**. Change will be **expected** to will be **required**

Background to bullet point 12. As part of its evidence to the Examination, submitted on 9 December 2025, following the Hearing into Site SWS18 on 15/10/2025, SLLMRRC submitted correspondence from Exolum dated 26 September 2025 (see Appendix 19 to SLLMRRC submission) This stated the following requirement : " you can build housing but we would require 5 metres one side of the pipeline and 7 metres the other for access and also safety zone for residents"

Bullet Point 12. Delete existing wording and insert new wording. **An exclusion zone of 5 metres one side of the Pipeline and 7 metres the other, should be provided for access and also safety zone for residents**.



<u>The following are items not referenced in MM440</u>

New Bullet Point 13. Ref EXAM188 (Mining Remediation Authority at Gov.uk and their representation of 02-Oct-2025**, SWS18 is in Development High Risk Area (DHRA) probable coal workings and coal outcrop which may have been worked at shallow depth running through red line boundary**. Any formal application needs a Coal Mining Risk Assessment (CMRA). We are not aware that the developer AcAb has carried this out.

New Bullet Point 14. **In accordance with Policy DC1, CIL/Planning Obligations would be required as a result of development of Site SWS18. Matters requiring developer contributions are indicated in the Integrated Infrastructure Delivery Plan, Final October 2025. Details of any CIL/Planning Obligations will be finalised at the planning application stage.**

Background to Bullet point 15. Consultations on the Draft Plan and the Arup Report Infrastructure Schedule Addendum (EXAMS 128 and 128A) identified potential impacts on local Community Services arising from the Development. The IIA Assessment Report Addendum Modifications Consultation states in Para 3.3.2 "greater consideration of the need for healthcare facilities in a variety of locations – more explicit in what is needed.

New Bullet Point 15. **Contributions will be required, in accordance with Policy DC1, for community purposes including for and local health, education and nursery provision.**

Continued...



Background to New bullet point 16: If Site SWS18 is allocated for development it is assumed, under the modified wording of Policy GS4, that agricultural surveys have been carried out before allocating the Site. EXAM 130 indicates that the Site is "likely to be Grade 3b, 4 or 5, urban or non agricultural", i.e. meaning that the requisite surveys have not been carried out prior to allocation. Given that the Site has for many years been grazed for cattle and sheep it is most unlikely to be below Grade 3. MM440 – under "Conditions on Development", the need for agricultural surveys is not included. In objecting to MM440 it is proposed that a bullet point 15 be included.

New Bullet Point 16. **Development will only be permitted where agricultural surveys indicate that the requirements of Policy GS 4 have been met.**



Appendix01

Detailed Appraisal of housing on the former Lodge Moor Hospital Site

Former Lodge Moor Hospital Site Housing Development
Total Gross Site Area – 18 ha approx

Total dwellings – 272, of which: 3 storey apartments – 96, 3 storey Town Houses – 73, 2 storey dwelling houses 103

Overall density of the Site: 15 dwellings /ha.

Site SWS18: Land between Lodge Moor Road and Redmires Conduit

Total Gross Site Area – 9.20 ha

Total housing capacity – 258 homes of which 103 affordable homes (75% - 77 social homes to rent and 25% - 26 affordable home ownership)

Overall density of the Site: 28 dwellings/ha.

NOTE: Applying the density at Lodge Moor Hospital site of 15 dwellings /ha. To the gross area of SWS18 (9.2 ha), gives 138 dwellings.



General Comments

Based on the Council's IIA Addendum (Modifications) the Modifications to the Plan perform worse on land, landscape, biodiversity, and transport (pp10 and 11)

The Call for Sites in 2014 and subsequent Housing Land Availability Assessments resulted in many developers and land owners submitting Green Belt Sites for development. A key factor in the Council selecting Green Belt Sites for further appraisal was availability and deliverability information provided by developers. This meant many sites were discarded early in the Plan preparation process, even if they were more suitable for overall planning and infrastructure reasons.

If other Green Belt sites were at least as suitable for overall planning and infrastructure reasons as those selected, but availability information was not provided, why were those other Sites not carried forward for further appraisal using the same the same strict planning criteria as for the Green Belt Sites which were eventually proposed for development? See EXAM 130 Selection of Sites for Green Belt Release Topic Paper and for examples, previous Housing Land Availability documents which appraised Call for Sites submissions.

The Green Belt Site Modifications place huge commitments on developers including affordable housing requirements, school/burial grounds, buffers, ecology, open space/green space, highways and transport, infrastructure work including flooding and drainage, local highways and transport, air quality, heritage, station related requirements. Yet despite all these constraints, the majority of which have not been investigated in detail, housing numbers are proposed based on a superficial calculation of Site area multiplied by an assumed density of housing, the implications of which are that high affordable housing numbers can be delivered.

SLLMRRC demonstrates in its representations on MM 440 **that the density assumptions are unrealistic and a much lower housing figure should be assumed. This leads to doubt about the feasibility, viability and deliverability of the Sites.**

Screening of Main Modifications

General point: In screening of the Main Modifications the Consultants found that **"several require further consideration through the IIA**



process, both at the strategic and local level" (para 3.3.2)." These are not tidying up changes, but as the Consultants, who have provided much of the analysis throughout the Plan Examination Process, indicate, they are significant enough to require further appraisal. The Topics identified largely apply to all the Green Belt Sites for development, though some are of specific relevance to individual Sites, i.e. the provision of burial grounds and schools.

Those which apply to most of the Green Belt Sites are:

- amendments to the spatial strategy and additional site allocations for housing and employment.
- Green Belt release;
- healthcare and active travel changes;
- stronger flood risk references;
- more protection for wildlife sites;
- stronger mitigation of recreational pressure on European sites.

Spatial Strategy

General Comment. The Draft Local Plan was published for consultation in 2023. In respect of the proposed release of Green Belt for housing and employment development the Spatial Strategy has fundamentally changed. Part 1 of the Plan Housing Strategy, paragraph 3.6, still states that "Releasing large amounts of Green Belt land would potentially jeopardise the regeneration of Brownfield sites and would lead to higher carbon emissions due to the increased need to travel". The currently proposed allocation of substantial areas of Green Belt for housing significantly weakens the Plan's priority to develop Brownfield sites.

Community Infrastructure

Para 3.3.2 bullet point 1 **Comment re Site SWS18.** : explicit and wider consideration of healthcare needs at the local GP Surgery in Lodge Moor, including staffing and facilities is required. These arise from an increase of population if Site SWS18 Lodge Moor Road is developed. Estimates using indicated housing capacity of 258 dwellings and an average of 2.3 persons per dwelling equals approximately 600 new patients.



Recommendation: Healthcare requirements should be included as a condition on development in Modification MM 440.

Para 3.3.2 Bullet point 2: **Comment re Site SWS18:** Proposed public transport and active travel measures are included for Site SWS18 in EXAM 132F (Appendix).

Recommendation: Public Transport and active Travel improvements, as set out in EXAM 132F, should be included as a Condition on Development in Modification MM 440

Biodiversity

Para 3.3.2 Bullet Points 1- 4. **Comment re Site SWS18:** Biodiversity measures in MM440 are too vague. More explicit measures should be included in MM 440:

a) To provide ecological corridors and deliver BNG on Site within these areas in line with the BNG hierarchy;

b) To protect the Redmires Conduit Wildlife Site. The word "minimum" in MM440 is too vague and open to interpretation.

Recommendation: More explicit measures should be included in MM 440 Conditions on Development, in accordance with (a) and (b) above

Selection of medium and small sized Green Belt Sites

Paragraph 4.2.14 Site SWS18 should not have been proposed for development, given the following constraints: local highways (off site), public transport, flooding and drainage on and off site, the oil pipeline and impact on the landscape, biodiversity, the Local Wildlife Site and the Heritage Assets.

General Conclusions stemming from the findings of the IIA Report Addendum Modifications

The Council's own Integrated Impact Assessment Modifications Report says the modified Plan performs worse on soil and land, landscape, biodiversity and transport.



The Proposed Green Belt Development Sites have multiple constraints i.e. flood and contamination, highways and transport, an oil pipeline, wildlife and landscape buffers, ecology and archaeology requirements, heritage work and Green Belt obligations, school land and burial land. These constraints lead to long lists of Conditions on Development for each of the Sites. Yet the Sites Modifications still assume high housing numbers. Reductions in these numbers, having regard to constraints, are proposed in the further modifications for each of the Green Belt Sites.

In light of the extent and nature of the constraints and the significant reduction of housing numbers the Modifications can be challenged on the grounds of justification and deliverability.

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The NPPF 24 "Golden Rules" only provide general policy guidance. It is for the Sheffield Plan through its Policies and Proposals to clearly demonstrate both in plan wide policies and site specific detail how the "Golden Rules" would work in practice. The Plan fails in the Green Belt Site Modifications whereby the Conditions on Development are too vague and imprecise. Examples where this is the case are: affordable housing, ecology requirements, highways and transport requirements, and off site requirements where developer contributions would be required and open space and compensatory improvements. With regard to the latter, the Modification to Plan Policy NC15 does not provide a clear and differential policy framework for the Green Belt Sites as indicated by the Golden Rules. This list is not exhaustive but illustrates why the Plan is not sound in respect of the proposed Green Belt development Sites.

In light of these Conclusions and inadequate Conditions on Development in the individual Green Belt Housing Site Modifications, the Inspectors are urged to find these Modifications unsound.

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REF5.0203

Outlook

Sheffield Plan - MM459 and CH03

From [redacted]
Date Fri 2026-05-01 2:31 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

MM459 - MAIN MODIFICATIONS FOR PROPOSED SITE ALLOCATION CH03

I am writing this as a former resident of Sheffield and a frequent visitor to Chapeltown and Warren Lane/Top Warren specifically.

OBJECTIONS - BASED ON THE MODIFICATIONS BEING UNSOUND, NOT JUSTIFIED AND INEFFECTIVE

1 Not justified

The allocation of Site CH03 is not justified because the Council has not fully explored all brownfield alternatives. If the Council is relying on the 'Golden 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, because the Plan relies on a vague package of improvements without clearly proving deliverability. The loss of Green Belt impacts the mental well-being, noise pollution and air quality of the community, which contradicts the Plan's aim for sustainable development. The exceptional circumstances required for Green Belt release are not met. The loss of Site CH03 would result in significant urban sprawl and the merging of distinct communities.

2 Ineffectiveness of Buffer (unsound)

The current modification fails to define the scale, nature or position of the required buffer zone between the employment site and neighbouring established homes and fails to account for the unique topography and potential for noise funnelling and light pollution specifically at this location. Without specific parameters (eg minimum depth in metres, required landscaping density, or acoustic barrier specifications), the buffer remains a concept rather than an enforceable planning requirement. This makes the plan unsound because it is not effective.

The generalised nature of MM459 fails to account for the site-specific topography. Without a requirement for a 'topographical impact assessment', the proposed buffer zone may be physically incapable of providing the intended screening from the higher elevations of the site.

A landscaped buffer will not adequately mitigate the significant adverse effects of employment development on the amenity of residents on Warren Lane and Top Warren (noise, light pollution, traffic, and visual intrusion). Any development (and the consequent loss of Green Belt) that necessitates a buffer, will still result in reduction in air quality and increased noise which cannot be "buffered" away.

‘The site is on Green Belt and within 250m of a historic landfill site’. The buffer itself could be at risk of contamination and may fail to provide a safe, healthy amenity space.

3 Zonal Approach - Unsound, unjustified, ineffective

The proposed zonal approach to site CH03 is not justified as it fails to account for site-specific constraints such as topography, ecological importance, and infrastructure capacity in the Chapeltown area. Without comprehensive site-specific, rather than zonal, restrictions, the plan is not effective, failing to prevent environmental damage or significant traffic congestion. The approach fails to properly assess the cumulative impact of removing this specific portion of the Green Belt before allocating it.

4 Environmental Impact (unsound)

MM459 is unsound as it fails to adequately protect ancient woodland.

5 Infrastructure (ineffective)

The plan is not effective because the local road network lacks the capacity for the increased heavy goods vehicle (HGV) traffic associated with this employment allocation, leading to severe congestion.

Margaret Melluish
[redacted]

REF5.0204

Outlook

Please include the extension of the General cemetery LWS (Open Space from Montague St to Sunderland St)

From [redacted]
Date Fri 2026-05-01 5:25 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

[redacted]

Please indicate the extension to the General Cemetery LWS on the final Sheffield Plan. It was approved a year ago by the local LWS panel and that decision was notified to the Planning Dept ... see statement from Dr Rivers below.

It is surprising it has been omitted from the draft plan, and needs adding. It took a lot of effort by local people to secure it.

johnrichard Auckland

From: [redacted]
Sent: Tuesday, May 06, 2025 17:03
To: [redacted]
Subject: Re: General Cemetery LWS extension outomce

Dear [redacted]

I only sent you the map last week as that is all that goes to planning as the LWS policies refer to the LWS showing on the policy map.

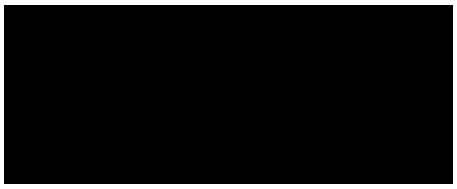
The words that went to the LWS panel last week (which include a representative from planning) were the recommendation below along as part of a briefing note including the proposed area on a map which we then plotted better on GIS after the meeting (the map I sent you).

Recommendation: designate SCC-owned land between Montague Street and Sunderland Street, known as 'Montague Street Open Space' and 'Pembroke Street Open Space', as Local Wildlife Site and add to the existing LWS 130 General Cemetery, by means of a boundary amendment.

We have taken a pragmatic approach and included 'Pembroke St' which is a cycle path (as there are cycle paths through other LWS) but not Montague Street, which although closed to through traffic is still a two-lane road with cars parked on it. This is consistent with other LWS.

The process is now complete, so please feel free to talk to FoGeneral Cemetery about management etc.

With regards
[redacted]



REF5.0205

Outlook

Sheffield Local Plan – Main Modifications Consultation: Objection to Site NWS31 (Storth Lane/Green Lane, Wharncliffe Side)

From [redacted]
Date Fri 2026-05-01 6:27 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>
Cc [redacted]

External email

Dear Sir/Madam,

Re: Sheffield Local Plan – Main Modifications Consultation
Site Reference: NWS31 (Storth Lane/Green Lane, Wharncliffe Side)

I write to formally object to the proposed Main Modification relating to site NWS31. This representation is made on the basis that the modification renders the Plan unsound, when assessed against the tests in the National Planning Policy Framework (NPPF), specifically that it is not justified and not consistent with national policy.

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1. The Plan is not Justified (NPPF paragraph 35)

Paragraph 35 of the NPPF requires that a Local Plan be supported by proportionate and up-to-date evidence and represent an appropriate strategy, taking into account reasonable alternatives.

The proposed modification fails this test in respect of NWS31 for the following reasons:

- Outdated evidence base: The justification for release of this Green Belt site relies on housing need and land supply evidence (including the Strategic Housing Market Assessment and associated studies) that is no longer reflective of current conditions, including updated population projections, economic forecasts, and national policy direction.

- Failure to demonstrate consideration of reasonable alternatives: There is insufficient evidence within the modification documentation to demonstrate that a robust, recent, and comprehensive review of brownfield land and non-Green Belt options has been undertaken. The absence of a clearly evidenced sequential approach (brownfield → non-Green Belt → Green Belt) undermines the Plan's spatial strategy.

- Lack of proportionate evidence specific to the site: The modification does not provide updated, site-specific evidence to justify why NWS31, in particular, represents the most appropriate option when compared against alternatives, especially given its Green Belt status.

In the absence of up-to-date and proportionate evidence, and without clear demonstration that reasonable alternatives have been fully assessed, the inclusion of NWS31 cannot be considered justified.

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2. The Plan is not Consistent with National Policy (NPPF paragraphs 140–147)

The NPPF is explicit that Green Belt boundaries should only be altered in exceptional circumstances, which must be fully evidenced and justified through the plan-making process (paragraph 140).

The proposed modification fails to meet this requirement:

- Exceptional circumstances not demonstrated: The modification does not provide clear, updated, and compelling evidence to demonstrate that exceptional circumstances exist to justify the release of NWS31 from the Green Belt. Generalised housing need does not, in itself, constitute exceptional circumstances without a robust and evidenced lack of alternatives.

- Failure to apply national policy tests rigorously: Paragraphs 140–141 require authorities to examine all other reasonable options for meeting identified need before altering Green Belt boundaries. As noted above, there is no clear evidence that this requirement has been satisfied through a recent and comprehensive assessment.

- Conflict with Green Belt purposes (paragraph 143): The allocation risks undermining key Green Belt purposes, including safeguarding the countryside from encroachment and preventing urban sprawl. The modification does not adequately demonstrate how these harms are avoided or clearly outweighed.

- Inappropriate reliance on “Grey Belt” interpretation: To the extent that the site is implicitly treated as lower-quality Green Belt land, the modification does not provide a clear, policy-compliant assessment to justify any departure from established Green Belt protections.

Accordingly, the proposed release of NWS31 is inconsistent with national policy.

Conclusion

For the reasons set out above, the proposed Main Modification relating to site NWS31 is not sound. In particular, it:

- Is not supported by proportionate and up-to-date evidence
- Fails to demonstrate that reasonable alternatives have been exhausted
- Does not evidence the exceptional circumstances required for Green Belt release
- Conflicts with national policy on Green Belt protection

I respectfully request that the Inspector recommends the removal of site NWS31 from the Local Plan.

Yours faithfully,

Paul Jannaway

REF5.0206

Outlook

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

From [redacted]
Date Fri 2026-05-01 8:17 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

4 attachments (7 MB)
7591cf46-3263-4ce5-b7ca-e3c9725d5bbe.jpeg; IMG_2045.jpeg; IMG_4794.jpeg; IMG_5322.jpeg;

External email

Dear Strategic Planning Team,

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

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

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

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

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

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

The Council's own appraisal says the Main Modifications make the Plan worse for soil and land,

landscape, biodiversity and transport. That is not my claim - it is in the Council's own IIA.

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

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

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

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

Yours faithfully,

Shaun Doncaster
[redacted]
1/5/2026









REF5.0207

Outlook

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

From [redacted]
Date Fri 2026-05-01 8:54 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[redacted]

Sent from my iPhone

Dear Strategic Planning Team,

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

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

I therefore set out below my objections to specific modifications.

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

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

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

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

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

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

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

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

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

effectiveness and justification, and risks exacerbating health inequalities unless strengthened.

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

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

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

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

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

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

deliver the infrastructure and affordable housing needed.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Deborah Bellamy

REF5.0208

Outlook

Objection to MM410 & MM411

From [redacted]
Date Fri 2026-05-01 9:08 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Please register my objection to the above modifications.
The proposals to build on our local greenbelt is against the fundamental tenets of the national policy and I request that the sites be removed from all proposals.

The sites are already heavily congested by traffic and, on Beaver Hill there is historic evidence of flooding. Providing access to these sites would only serve to add to the problems.

The effect on our local wildlife and biodiversity cannot be understated.

I therefore consider the proposals unsound.

Dawn Shaw
Sent from my iPhone

REF5.0209

Outlook

Comments on site SES03 in the Schedule of Proposed Main Modifications to the Sheffield Plan

From [redacted]
Date Fri 2026-05-01 10:48 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

[redacted]

Mr R. Beckett
[redacted]

Dear Sirs, I wish to object most strongly to the proposed industrial and travelling show-people site on the field behind Springwell Grove, site SES03) and request it should be removed from the Plan.

Here's what the council's own evidence shows:

Air Pollution which consistently exceeds the legal limits.
We have lived here 25 years, brought up our [redacted]children and now enjoy our grandchildren spending time with us. We demand they breath clean air.
The monitoring station set up by the council at Moss Way/Donetsk Way, which is right next to the proposed site, recorded NO2 levels of 46, 47, 46, and 48 µg/m³ from 2012 to 2015. The legal limit is 40. This means it was **over the legal limit every year.** After that, the council stopped monitoring. When we filed a Freedom of Information request to find out why, they responded: "We do not hold information about the decision-making process as to why monitoring stopped." They have no explanation. Plus, there's currently NO active air quality monitoring anywhere near Eckington Way, even though they want to build an industrial site there.

Traffic is at breaking point.
We have to travel most days in and out of the area for work commitments. The time wasted queuing is ridiculous and if there is a breakdown or minor road traffic accident, everything grinds to a standstill.
According to the council's own transport data, junctions on Eckington Way are operating at 101–118% capacity. Their head of transport admitted during the examination hearing that there are no plans to improve the roads at all. No funding available or likely to be and no long-term plans or scheme. All this was before the new Green Belt sites were added.

Public transport none existent
The site received the worst possible rating for public transport access. The reopening of the Barrow Hill Line, which was supposed to justify the site, was cancelled in July 2024. There's no replacement or funding available.

Protected wildlife
There are various species of birds, including Skylarks and some of which are protected due to their severe 62% National decline. These in decline have been confirmed nesting in the

field. There are also many other wild animals which we enjoy seeing including red-deer, foxes and hedgehogs. No ecological survey has ever been conducted.

Grade 2 farmland.
The council's own officers have confirmed that the site contains the best and most versatile agricultural land. We may be in need of this given the amount of farmland being compulsory purchased for solar farms.

In conclusion the proposed modifications to the plan for this area are detrimental to the area and will impact negatively on the environment, this in turn will increase risk to public health and wellbeing of residents creating additional strain on health services. With the lack of public transport more vehicles will be using the highways that are already in a poor state of repair making the area a less attractive place to live so reducing the value of properties for homeowners. By asking for public opinions on these proposals I hope that you will give serious consideration to the feedback provided and demonstrate that you will use it constructively and positively when making final decisions.

Yours Sincerely
Mr R. Beckett

REF5.0210

Outlook

Sheffield Plan Main Modifications Consultation Responses for Chapeltown, Ecclesfield and Grenoside - Save our Green Belt Community Action Group Submissions

From [redacted]
Date Sat 2026-05-02 8:16 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

8 attachments (12 MB)

Sheffield Plan Site CH03 Thorncliffe Road Chapeltown v2.1.pdf; Sheffield Plan Site CH04 Cowley Hill Chapeltown v2.0.pdf; Sheffield Plan Site CH05 Land to the East of Chapeltown Road v2.0.pdf; Sheffield Plan Site NES36 Land to the South of the M1 Motorway J35 v2.0.pdf; Sheffield Plan Site NES37 Creswick Avenue v2.0.pdf; Sheffield Plan Site NES38 Grenoside Grange and Holme Lane Farm v2.0.pdf; Sheffield Plan Site NES39 Land at Wheel Lane and Middleton Lane S35 8PU v2.0.pdf; Sheffield Plan Sites Cumulative Impact Assessment v2.0.pdf;

[redacted]

Good morning,

In advance of the 'Sheffield Plan Main Modifications' consultation closing date of 5pm on 5th May 2026, please find attached Transport Statements and Cumulative Impact Assessment, which I hereby submit on behalf of the **Chapeltown, Ecclesfield and Grenoside Save our Green Belt Community Action Group.**

The attachments comprise Transport Statements for Sites CH03, CH04, CH05, NES36, NES37, NES38, NES39, plus the Cumulative Impact Assessment to be read in conjunction with the individual Statements.

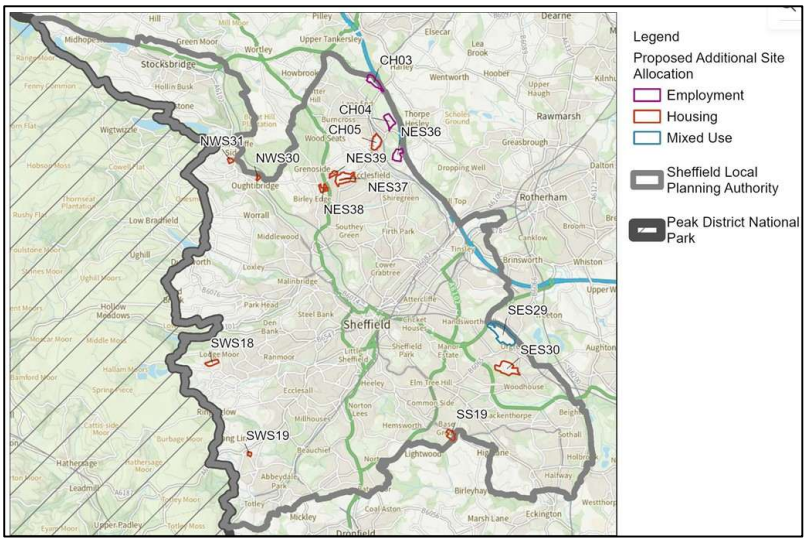
Should you have any queries please feel free to contact me by email or on the number below.

Regards,
Ian Taylor
Aprica ltd
[redacted]

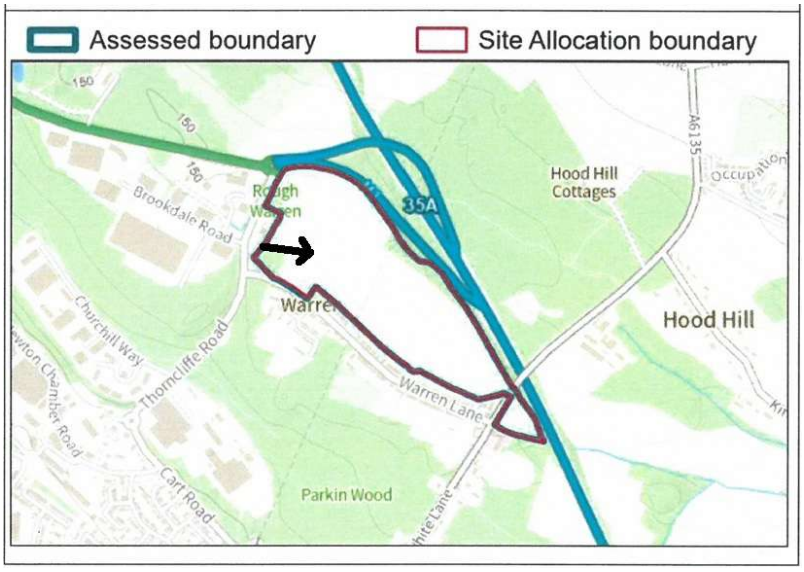
“The Sheffield Plan”

Review of Proposed Junction for Site CH03
‘Land Bordered by M1, Thorncliffe Road, Warren Lane and White Lane, S35 2YA’

(also referred to by Sheffield City Council as Site S03112)



Map of Sites - SCC



Site Boundary (SCC) Annotated to Show Location of Proposed Access

April 2026

1 TERMS OF REFERENCE

Aprica ltd has been commissioned by a local interest group to comment on the highway implications for the proposed junction arrangement at Site CH03 (also previously known as site SO3112) '*Land Bordered by M1, Thorncliffe Road, Warren Lane and White Lane, S35 2YA'*, hereafter referred to as 'CH03', one of the sites identified in the proposed 'Sheffield Plan' ('the Plan') Consultation Documents.

The purpose of this report to is assess the transport and traffic implications of the current proposal. It is intended that this report be considered by the interest group with a view to submitting a formal response to Sheffield City Council ('the Council'). The report is based on local knowledge, prevailing highway conditions and available documents, illustrative drawings etc.

Ian Taylor has produced this report. Ian is an Incorporated Engineer and a Member of the Institution of Civil Engineers (I.Eng MICE), with thirty-five years' experience of public and private sector highway infrastructure disciplines including transportation planning, RoSPA accredited accident investigation & prevention, traffic management, road safety audits, traffic regulations, and highway design & construction. Ian has led on numerous major highway schemes for Local Authorities and has presented at Planning Committees, Council meetings, public meetings and drop-in events, and at Public Inquiry.

2 INTRODUCTION

The scope of this report is to consider the proposed 'Main Modifications' for the Sheffield Plan (the Plan), for site CH03, a proposed employment site. The intention is to offer expert comments on useability by the travelling public and the impact on the highway network.

For ease of reference this report is separated into the following parts:

1 Terms of Reference

2 Introduction and Executive Summary

3 Background

4 Assessment of Highway Proposals

5 Sustainability

6 Injury Collision Record

7 Other Factors to Consider

8 Conclusions and Recommendations

EXECUTIVE SUMMARY

This report reviews the highways and transport implications of the proposed access arrangements for Site CH03, an employment allocation within the Sheffield Plan. The aim is to assess whether the proposal is safe, deliverable, and compliant with national and local transport Policy.

Planning Inspectors have deemed the Plan sound only if certain modifications relating to CH03 are made. However, current evidence lacks essential detail, including cumulative traffic impacts and accurate trip forecasts.

Key issues identified include the unsafe proposed access on Thorncliffe Road, which lies only around 75m from the M1 slip road, creating a significant highway safety hazard. Warren Lane also suffers from longstanding issues such as rat-running, inappropriate HGV use, speeding, and limited road width. These problems are likely to become worse with additional CH03 traffic.

The site is overwhelmingly car-dependent due to the absence of footways, steep gradients, no cycle infrastructure, poor bus service frequency & infrastructure, and distance from rail facilities. These factors conflict with the National Planning Policy Framework and Active Travel England requirements.

Concerns also exist that the trip generation modelling may underrepresent actual HGV and LGV movements.

Although reported injury collisions might appear modest, the Department for Transport guidance suggests that, due to non-reported and unrecorded injury collisions, actual numbers are likely to be significantly higher than the records show.

Overall, the proposal fails three of the four key tests for a ‘sound’ Plan, and conflicts with National Policy. It is recommended that Site CH03 be removed from the Sheffield Plan. If retained, development should only proceed once major junction improvements, a safe alternative access point, and robust sustainability and mitigation measures are fully designed and secured by Grampian Condition.

3 BACKGROUND

Planning Inspectors have considered the Sheffield Plan proposals under a number of stages of the Planning process. This stage is 'Regulation 19' of The Town and Country Planning (Local Planning) (England) Regulations 2012. Regulation 19 focuses on four main tests, the previous comments and objections etc already having been considered in what is effectively an agreed, by the Planners, shortlist of sites with potential. The Inspectors are unlikely to consider previous comments, since they have already considered them in shortlisting, and will now look at four tests, namely that the Plan must be he plan must be: **Positively Prepared:** Based on a strategy that seeks to meet objectively assessed development and infrastructure requirements; **Justified:** Based on proportionate evidence; **Effective:** Deliverable over the plan period; **Consistent with National Policy** (such as the National Planning Policy Framework (NPPF).

The Inspectors have found the Plan to be sound and legally compliant subject to some modifications being made. The modifications must undergo sustainability appraisal, habitats assessment, and public consultation. The Inspectors will essentially seek to determine whether adding site CH03 makes the plan more sound (by meeting employment needs) or unsound by creating unmitigable traffic issues.

The proposals still lack detail on, for example, numbers of houses, number of people employed, acceptable likely trip data (see below under TRICS) etc., which makes it difficult for consultees to offer fully considered responses. Neither is there mention of the possible cumulative effect of the many other already ongoing developments outside the main cluster of sites (Chapeltown and Ecclesfield), for example those in Grenoside, Oughtibridge and Deepcar, or the unrelated ones already in construction in and around Chapeltown/Ecclesfield itself. It does not seem that the overall traffic impacts of these developments have been acceptably considered in the 'individual' site assessments.

Many of the proposed sites, not least site CH03 are, geographically at least, well-located for access to the strategic road network (M1/A616/A6135). These major roads seem, however, to have been prioritised in the assessments, whilst the local network's traffic and safety has been largely overlooked. The consultation documents provide no confidence that the local highway network would be able to cope with the increase in traffic demand. Neither is there anything to offer confidence that that local and national policy and objectives, such as active and sustainable travel, could be achieved.

Whilst it must be accepted that building on some Green Field land might offer more variety and choice of homes, and local employment opportunities, this should only be considered over Brown Field/urban development where it is genuinely right to do so.

More detail needs to be provided on, and more consideration given to, the impact on the existing local road network and how any proposals taken forward could be mitigated to reduce adverse effects. Should it not be possible to reduce impact to acceptable levels, alternative sites should be sought.

In the previous review of the proposed Greenfield sites (July 2025) Aprica assessed site CH03. At that time no access arrangements were available. The earlier assessment is shown below.

Green Belt site allocation appraisal (Employment)

Site Reference: S03112

Address: Land bordered by M1, Thorncliffe Road, Warren Lane, and White Lane, S35 2YA

Gross site area: 18.06 Hectares

Net housing area: 0.00 Hectares

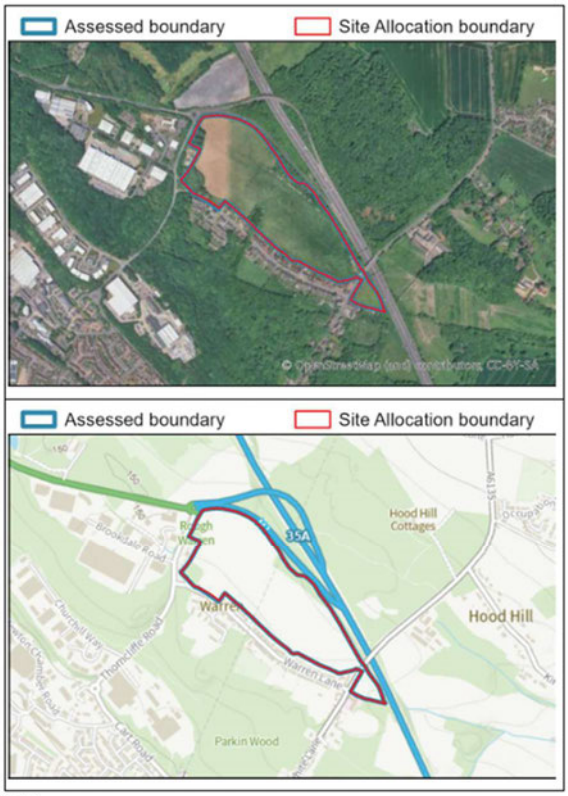
Estimated housing capacity: 0 homes

Net employment area: 18.06 Hectares

Ward: East Ecclesfield Ward

Housing Market Area: Chapeltown & Ecclesfield

Ownership: Private



Page **80** of **332**

Distance to core public transport network (CPTN)	Y	Some of the site is within the Core Public Transport Network buffer, or within a 400m walk from a 3 bus per hour bus stop
Access to active travel/cycle network	YY	Site within 400m of an existing or proposed route which is at LTN1/20 standard
Potential to increase the viability of public transport or support investment in new public transport infrastructure	-	Site is beyond 400m of planned bus network improvement or 800m of planned tram/rail network improvement

- Some of the site is within the Core Public Transport Network, or within a 400m walk from a 3 bus per hour bus stop (as of December 2023). It is about 1.5km from Chapeltown Railway Station.

- Site is within 400m of an active travel/cycle network.

- Potential capacity issues previously identified at junctions (roundabouts) of Burncross Road/Lound Side and Ecclesfield Road/Cowley Lane in Chapeltown town centre (within 2km). Contributions may be required to local highway improvements identified through the additional transport modelling and/or Infrastructure Delivery Plan.
- Site adjoins the M1 and junction(s) of the A616. Contributions may be required to strategic highways improvements at junctions on the M1.

Aprica's comments were as follows, and still apply:

- The double-green (YY) rating for proximity to (within 400m) an active travel network is questionable, as it probably refers to the circular Route 67, which is more of a leisure loop around High Green, Wentworth, Thorpe Hesley and Parson Cross. Commuter cyclists are unlikely to find this loop beneficial, attractive, or of use to commute
- Bus travel enhancement is unlikely to be viable, with an unrated score (yellow) for proximity to planned improvements. The nearest bus stop is over 400m from the centre of the site and over 1000m from the furthest part of the site 'as the crow flies'
- Capacity issues have been identified at Burncross Road/Lound Side and Ecclesfield Road/Cowley Lane. Contributions to local highway improvements are mentioned and this should be clarified should this proposal be progressed
- There have been two serious injury collisions on the M1 offslip (three injuries) and three slight injury collisions (five casualties) on the roads in question, specifically Thorncliffe Road, Warren Lane and White Lane (CrashMap 2019-2023)
- Accesses onto Thorncliffe Road, Warren Lane and White Lane would need to be considered further should this proposed site be progressed.

Because of the concerns raised during the previous hearings, the Inspectors have stated that the final proposals for site CH03 must include 'Golden Rules' main modifications. These are currently part of the April 2026 consultation and comprise '*No full occupation of the site until the A616/A61 junction improvements are secured or completed'; 'Development must include a formal HGV Management Plan to prevent heavy vehicles from using unsuitable residential sections of Warren Lane; 'Mandatory creation of high-quality pedestrian/cycle links toward Chapeltown to reduce car dependency for staff'.*

4 ASSESSMENT OF HIGHWAY PROPOSALS FOR SITE CH03

Surrounding Network

The M1 Junction 35A (Stocksbridge Bypass) is often congested. It is the main route between the South and Manchester etc, via the Woodhead Pass. Traffic can exit the M1 Northbound at the junction and enter the M1 Southbound. Congestion is caused by the bottleneck at the top of the slip road where capacity is limited. HGV's can be particularly slow making the tight turns at the roundabout, thereby slowing the flow of traffic.

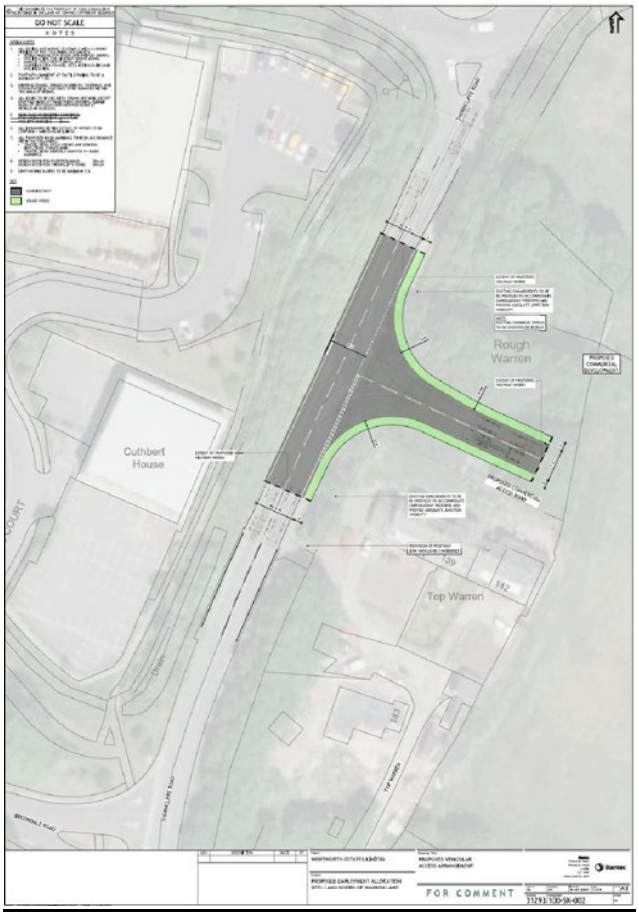
Warren Lane has been a long-standing issue because of rat-running and inappropriate HGV use. Several mitigation measures have been implemented, such as a partial one-way with no entry at the Thorncliffe Road end, an 'environmental' weight limit and a 20mph speed limit. Resident's concerns about traffic volume speed and heavy goods movements remain despite these measures.

Proposed Access off Thorncliffe Road

The proposed access is only around 75 metres from the end of the Motorway slip road. This length would accommodate just ten queuing vehicles of mixed size, or no more than four HGV's. Drivers on the main carriageway pulling up to allow vehicles in or out of the proposed give way junction could easily create a tailback to the roundabout and onto the slip road.

It seems clear that the location of the proposed junction is entirely down to the parcel of land just to the south, which prevents access from further away from the Motorway slip road.

The proposed location of the access presents a clear hazard for Motorway slip road traffic and should not be agreed in its present position. If a safe and suitable alternative cannot be found the site should be withdrawn from the Sheffield Plan.



Proposed Access - Stantec

Warren Lane

As mentioned above, Warren Lane remains a long-standing issue because of rat-running and inappropriate HGV use. Mitigation measures including the partial one-way with no entry at the Thorncliffe Road end, the environmental weight limit and a 20mph speed limit have not fully addressed resident's concerns. It is still used as a short cut, particularly by drivers looking to bypass the congestion at the nearby M1 junctions. Whilst the one way has addressed the issue of drivers heading south-east to get from the Motorway to Chapeltown and Ecclesfield etc, it still facilitates those heading north-westwards. assumes that the one-way system and "No Entry" signs will "manage" the traffic. The Argument: If the existing system already fails to stop shortcutting with current traffic volumes, it is unjustified to assume it will suddenly work when Site CH03 adds hundreds of HGVs and worker vehicles to the mix. B. The "Severe" Residual Impact (NPPF Para 115) If Site CH03 forces all traffic onto Thorncliffe Road, and that traffic then "leaks" onto Warren Lane through the existing shortcuts: The Argument: The residual cumulative impact on the residents of Warren Lane will be severe. The narrowness of the road means that even a small amount of "leaking" traffic will lead to pedestrian safety risks and gridlock at the bridge. The road is quite straight in nature and speeding is a reported issue, particularly at the western end which is one-way. Warren Lane is not suitable for the high volumes of traffic that regularly occur. Much of the road is narrow with on-street parking and on some sections it is not possible for two large vehicles to pass. Recent industrial and housing development has generated in the Birdwell and Hoyland areas has generated additional traffic on Warren Lane, leading to the road essentially being at capacity. The proposed development of site CH03 would undoubtedly create even more traffic and should not be permitted.

5 SUSTAINABILITY

In the UK, standards for sustainable travel and the hierarchy of travel modes are set by the Department for Transport's (DfT's) Manual for Streets (MfS) and Local Transport Note (LTN) 1/20. The DfT publishes the National Planning Policy Framework (NPPF). Paragraph 114 explicitly states that applications should "give priority first to pedestrian and cycle movements." The MfS is the go-to guide for urban design. It established the hierarchy that places pedestrians at the top and private cars at the bottom. Active Travel England (ATE) is the government's Inspectorate. It reviews large planning applications (such as CH03) to ensure they actually meet these standards. If a site is "car-dependent," ATE can formally object.

More locally, the South Yorkshire Mayoral Combined Authority (SYMCA) has been mandated by the DfT that all local transport authorities are required to review and update their statutory Local Transport Plans (LTPs) to align with current national and local priorities, and to provide a more consistent basis for determining future investment priorities. 'Connecting Sheffield' is part of the long-term vision for the future of travel in the city of Sheffield, creating high-quality, convenient and safer routes into and around the city for cycling, walking and public transport. Funding has been made available, from central Government and other sources, to deliver work that aims to transform the city and enable people to make better travel choices. The website https://haveyoursay.sheffield.gov.uk/connecting-sheffield gives updates on projects. At present there are none in the vicinity of site CH03, or north Sheffield in general, but hopefully a case could be made for studies in the area.

For site CH03 the hierarchy of travel modes – 1. Walking, 2. Cycling & wheeling, 3. Public transport, 4. Private car – needs much more consideration and more detail provided on how active and sustainable travel can genuinely be achieved, before the site progresses. This is explored in more detail below.

The proximity of site CH03 to the Motorway network raises concerns that sustainability might not have been given due consideration. Employment facilities attract not just freight but also employees, many travelling by private car for reasons such as longer travel distances (via the convenient Motorway) and unsociable hours working (making cycling and public transport impractical or indeed impossible).

Sustainable Travel Modes

1. Walking: There are no footways on Thorncliffe Road in the vicinity of the site. There is one footway for people walking northwards from Chapeltown centre, but the footway terminates at Warren Lane some 200 metres or so from the site. Thorncliffe Road has a fairly steep incline and is a busy road, making it unattractive to pedestrians. In view of the above it is unlikely that anyone would walk to the site.

2. Cycling: Much as for walking, the road is quite steep and there are no cycle friendly measures whatsoever. Only the most serious cyclists would be likely to cycle to work and back. The claim that the site is within 400 metres of an active travel network is questionable, as it probably refers to the circular NCN Route 67, which is more of a leisure loop around High Green, Wentworth, Thorpe Hesley and Parson Cross. Commuter cyclists are unlikely to find this loop beneficial, attractive, or of use to commute.

3. Public Transport: Bus travel facilities are poor and enhancement is unlikely to be viable. The nearest bus stop is around 600 metres from the site (the Nationally recognised acceptable maximum being 400 metres). The main services are the M35 and 201, which run hourly or less, daytime only and none on Sundays. Chapeltown Railway Station is around 2km away, which is not convenient for rail travel.

4. Private Car: This is highly likely to be the mode of choice for most people accessing the proposed site. It is very close to the Motorway, users could be travelling at unsociable hours, and alternatives are non-existent or unattractive.

Trip Generation and TRICS

Aprica does not have the software or expertise to challenge TRICS (Trip Rate Information Computer System) and to do so would take many hours. It is therefore beyond the remit of this report but the core issue for Site CH03 seems to be the discrepancy arity between the theoretical model used by the Council and the physical reality of modern logistics. Objectors have argued, in earlier consultations, that the Council has "under-counted" the traffic impact. This would make the site appear more sustainable than it actually is. TRICS' accuracy is based on analysts and Planners picking 'comparable' sites to predict how much and what type of traffic a new one would create. Critics have argued that the Council used 'traditional warehousing' or 'general Industrial' examples whereas site CH03 is more likely to constitute a logistics hub, which would generate significantly higher HGV and LGV movements. By using an inappropriate category the projected vehicle numbers could be too low.

In addition choosing an inappropriate existing example would skew projected sustainable travel figures. Site CH03 is on a relatively steep, semi-rural edge with no walking or cycling facilities and limited bus services. Using better-connected samples would constitute data error. If traditional 8am to 5pm patterns were used, again this would skew traffic volumes and modes.

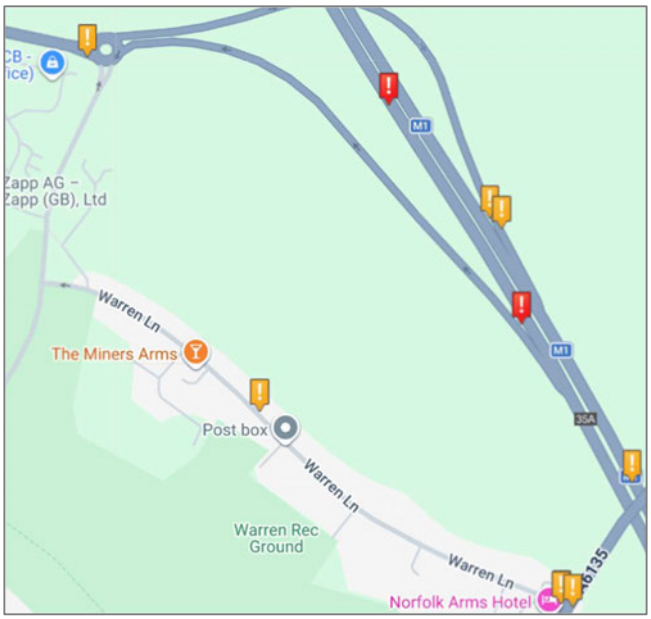
The data should be closely checked to ensure its soundness. Experience has shown that in practice actual trip numbers (especially for private vehicles) are very often higher than those suggested in TA's. Software can easily be used to manipulate and adjust modelled outcomes, whereas in real-world circumstances, people's behaviour and choices dictate what actually happens.

6 INJURY COLLISION RECORD

'CrashMap' is a website that uses official government data (the STATS19 database) collected by police forces across the country, to allow users to see where, when, and (for a fee) how road traffic collisions (RTC's) are occurring in their local area.

Data for the most recent five-year period (the accepted period in the Highways profession) 2020-2024 inclusive, shows 1 collision injury on the M1/A616 offslip, which resulted in 2 serious injuries. On the section of Thorncliffe Road under consideration there has been 1 slight injury collision. On Warren Lane there have been 4 injury collisions, resulting in 6 slight injuries. Whilst on the face of it this might not seem a particularly alarming record, it should be noted that although there is little published data on unreported collisions, the Department for Transport (DfT) suggests that '*for every reported and recorded injury collision there could be as many as 5 unreported injury collisions and 20 damage-only collisions*'. Near misses could be as many as 300 per recorded injury collision. It is

understood that in late 2025 a fatal collision occurred on Thorncliffe Road but no further details are known.



Thorncliffe Road Injury Collisions 2020-2024 (CrashMap)

7 OTHER FACTORS TO CONSIDER

The preliminary Ecological Appraisal Report does not specifically mention highways or traffic but does recommend retaining established woodland parcels and buffering off-site woodland to the north to preserve ecological connectivity and habitat value. This needs to be incorporated in any designs being developed.

The 2025 Air Quality Annual Status Report mentions Thorncliffe Road and Warren Lane in the map of monitoring locations and trends in the East Ecclesfield Ward. The document discusses the East Ecclesfield ward in the context of ongoing air quality monitoring as part of Sheffield's Local Air Quality Management efforts.

8 CONCLUSIONS AND RECOMMENDATIONS

Conclusions

Of the 'Four Points' mentioned in Section 3 above, the Inspectors should note the following:

Positively Prepared: The proposals do not meet 'objectively assessed development' or 'infrastructure requirements':

- The assessments seem to have been rushed in effort to meet timescales and are overly optimistic in favour of the proposed development.
- The major roads seem to have been prioritised in the assessments, whilst the local network's traffic and safety has been largely overlooked.
- The consultation documents provide no confidence that the local highway network would be able to cope with the increase in traffic demand. Neither is there anything to offer confidence that that local and national policy and objectives, such as active and sustainable travel, could be achieved.

Justified: The proposals are not based on proportionate evidence:

- The allocation of site CH03 is not supported by proportionate or complete transport evidence. The Transport Assessment Update does not assess the cumulative impact of CH03 alongside major neighbouring developments and its TRICS data input accuracy is questionable. It is possible that the site could generate significantly higher HGV, LGV and private car movements
- Again if TRICS outputs are not based on like-for-like sites the projected sustainable travel figures could be far too optimistic.

Effective: Deliverable over the plan period:

- The site cannot be made sound without major external highway works and even then would be likely to present additional hazards and congestion. It is therefore unlikely that acceptable proposals, in terms of Policy etc, could be delivered within an agreed period, if at all.

Consistent with National Policy: The proposals are not consistent with Policy such as the NPPF.

- The proposals do not offer sustainable transport improvements in an area where they are woefully inadequate at present.
- The proposals would have an unacceptable impact on local highway network and residents, including road safety. The proposed location of the access presents a clear hazard for Motorway slip road traffic and should not be agreed in its present position. Issues on key parts of the local network cannot be mitigated through the measures currently proposed. The existing level of risk, proven by the injury collision record, demonstrates an existing level of risk that would be heightened by additional site traffic.
- In terms of sustainability, walking to the site is unlikely due to the absence of footways on Thorncliffe Road, steep gradients, and significant traffic volumes, there is no cycle infrastructure whatsoever. , bus services are infrequent, and rail access is impractical at 2 km away. The site would be overwhelmingly car-dependent.
- Active Travel England (ATE) requires developments to enable at least 50% of short trips by sustainable modes by 2030, yet the consultation documentation presents no route, infrastructure, or plan capable of achieving this.
- No evidence is provided showing how LTN 1/20-compliant cycle infrastructure could be delivered.

Recommendations

The allocation of Site CH03 should be removed from the Sheffield Plan, due to likely road safety hazards, unmitigable constraints on the local highway network, and failure to be able to meet sustainability requirements.

If, contrary to this recommendation, the site is retained, a Grampian-Style Condition should be imposed such that no development can commence until the A616/A61 interchange improvements and Thorncliffe Road frontage works are fully funded and physically completed.

A safe, alternative access point must be identified and designed. If none is feasible, the site should not proceed.

Appropriate and deliverable mitigation measures need to be developed for Thorncliffe Road and Warren Lane as a minimum, which is likely to require physical, self-enforcing interventions and restrictions. Reliance on measure such as an HGV Management Plan alone is insufficient for safety or compliance with national policy. If appropriate and deliverable mitigation cannot be guaranteed, the site should not proceed.

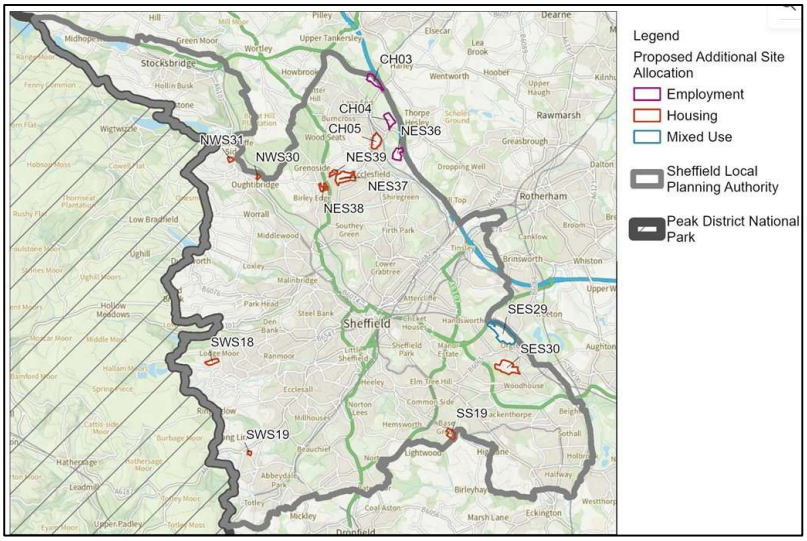
A complete cumulative and demonstrably accurate transport model is essential, capturing site CH03 traffic, local employment allocations, committed residential and commercial developments in Chapeltown/Ecclesfield and neighbouring areas, and HGV/LGV flows resulting from modern logistics use.

A credible, costed Sustainability strategy must be prepared in order to provide direct, safe walking and cycling links to Chapeltown etc via a new footway provision on Thorncliffe Road, segregated LTN 1/20-compliant cycle infrastructure, and improved bus service frequency and coverage with fully compliant bus stops and shelters (raised bus boarder kerbs, tactile pavings, bus stop clearways). These measures must be enshrined in Grampian Planning Conditions.

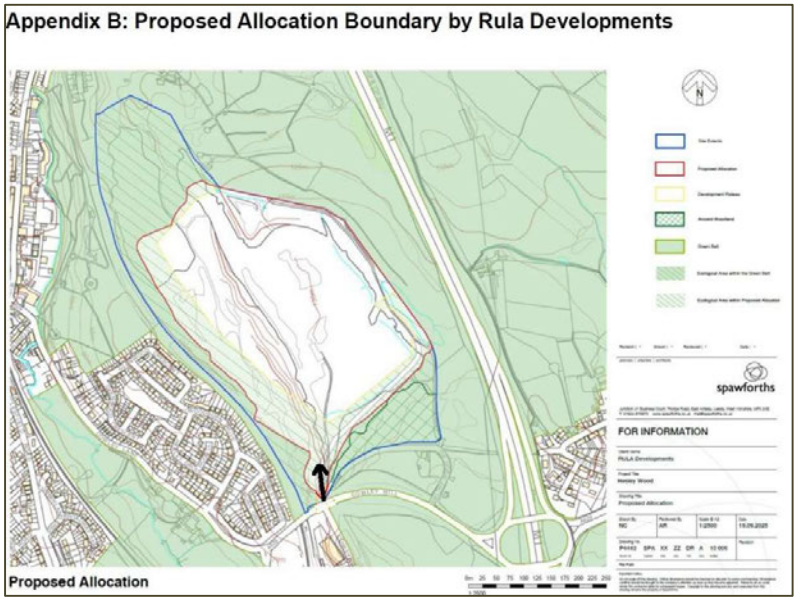
“The Sheffield Plan”

Review of Proposed Junction for Site CH04 ‘Hesley Wood, North of Cowley Hill, S35 2YH’

(also previously referred to by Sheffield City Council as Site S04639)



Map of Sites – SCC



Site Illustration, Annotated to Show Proposed Site Access – Spawforth

April 2026

1 TERMS OF REFERENCE

Aprica ltd has been commissioned by a local interest group to comment on the highway implications for the proposed junction arrangement at Site CH04 (also previously known as site SO4639) '*Hesley Wood, North of Cowley Hill, S35 2YH'*, hereafter referred to as 'CH04', one of the sites identified in the proposed 'Sheffield Plan' ('the Plan') Consultation Documents.

The purpose of this report to is assess the transport and traffic implications of the current proposal. It is intended that this report be considered by the interest group with a view to submitting a formal response to Sheffield City Council ('SCC'). The report is based on local knowledge, prevailing highway conditions and available documents, illustrative drawings etc.

Ian Taylor (I.Eng MICE) has produced this report. Ian is an Incorporated Engineer and a Member of the Institution of Civil Engineers, with thirty-five years' experience of public and private sector highway infrastructure disciplines including transportation planning, RoSPA accredited accident investigation & prevention, traffic management, road safety audits, traffic regulations, and highway design & construction. Ian has led on numerous major highway projects for Local Authorities and has presented at Planning Committees, Council meetings, public meetings and drop-in events, and at Public Inquiry.

2 INTRODUCTION

The scope of this report is to consider the proposed 'Main Modifications' for the Sheffield Plan (the Plan), for site CH04, a proposed employment site of 15.61 acres. The intention is to offer expert comments on the site's safe and practical useability by the travelling public, and the impact on the highway network.

For ease of reference this report is separated into the following parts:

1 Terms of Reference

2 Introduction and Executive Summary

3 Background

4 Assessment of Highway Proposals

5 Sustainability

6 Injury Collision Record

7 Other Factors to Consider

8 Conclusions and Recommendations

EXECUTIVE SUMMARY

This report reviews the highway, transport and sustainability implications of allocating Site CH04: '*Hesley Wood, North of Cowley Hill, Chapeltown, S35 2YH'* as an employment site within the Sheffield Plan Main Modifications (Regulation 19). The assessment concentrates on the proposed access from Cowley Hill (A629) and the effects on the local and strategic highway network, road safety, and compliance with national and local policy.

Site CH04 lies less than 500 metres from M1 Junction 35, an already heavily congested location where peak-period traffic frequently queues back onto the motorway slip road. Cowley Hill and Nether Lane are key local distributor routes operating close to and sometimes over-capacity, with limited physical scope for improvement. Existing congestion on these routes materially constrains the local network and undermines junction performance at the M1, creating safety and operational risks that would be exacerbated by additional development traffic.

The proposed site access is directly opposite the signalised Cowley Way junction, itself regularly saturated. Introducing a new access serving a modern employment or logistics use, likely to generate significant HGV, LGV and car movements, would add conflicting traffic demands at a critical point in the network. At present, no detailed or proven mitigation strategy has been demonstrated to show that these impacts could be reduced to an acceptable level, particularly on the local highway network downstream of the M1.

From a sustainability perspective, Site CH04 performs poorly. Walking and cycling routes are fragmented, steep, and unattractive, and do not comply with LTN 1/20 standards. The M1 and A629 act as significant severance barriers. Public transport provision is weak, with sub-standard bus stops at inconvenient distances and Chapeltown rail station approximately 1.6 km away. The evidence strongly indicates that the site would be predominantly car-dependent, contrary to the objectives of the National Planning Policy Framework (NPPF), Manual for Streets (MfS), and the expectations of Active Travel England (ATE).

The injury collision record on Cowley Hill and the M1 slip road is poor, with both serious and slight injury collisions recorded in the most recent five-year period. Given the already elevated risk levels, additional traffic (particularly freight vehicles), would be likely to increase safety risks, conflicting with national and local road safety objectives.

In summary, the allocation of Site CH04 is not supported by proportionate, robust or complete transport evidence. The proposal fails to demonstrate that its impacts can be effectively mitigated and therefore does not meet the Plan's tests of being positively prepared, justified, effective, or consistent with national policy.

It is recommended that Site CH04 '*Hesley Wood, North of Cowley Hill, Chapeltown, S35 2YH'* be removed from the Sheffield Plan. Should it nevertheless be retained, the Inspectors should require a fundamentally different access strategy, demonstrable network-wide mitigation, and enforceable Grampian-style conditions to ensure that no development proceeds until safety, capacity and sustainability issues are fully resolved.

3 BACKGROUND

Planning Inspectors have considered the 'Sheffield Plan' (the Plan) proposals under a number of stages of the Planning process. This stage is 'Regulation 19' of The Town and Country Planning (Local Planning) (England) Regulations 2012. Regulation 19 focuses on four main tests, the previous comments and objections etc already having been considered in what is effectively the Planners' agreed shortlist of sites with potential but requiring further assessment and consideration. The Inspectors are unlikely to consider previous comments, since they have already considered them in shortlisting, and will now consider the four tests, namely that the Plan must be: **Positively Prepared:** Based on a strategy that seeks to meet objectively assessed development and infrastructure requirements; **Justified:** Based on proportionate evidence; **Effective:** Deliverable over the plan period; **Consistent with National Policy** (such as the National Planning Policy Framework (NPPF).

The Inspectors consider the Plan to be sound and legally compliant subject to some modifications being agreed and made. The modifications must undergo sustainability appraisal, habitats assessment, and public consultation. The Inspectors will essentially seek to determine whether adding sites, such as CH04, makes the plan 'more sound' (by meeting employment needs etc), or 'unsound' by creating unmitigable traffic issues.

The proposals still lack detail on, for example, precise numbers and layout of houses, number of people employed, acceptable likely trip data (see below under TRICS), which makes it difficult for Inspectors to make a final decision, and for consultees to offer fully considered responses. Neither is there sufficient mention, or demonstrable evidence, of the possible cumulative effect of the many other already ongoing developments outside the main cluster of sites (Chapeltown and Ecclesfield), for example those in Grenoside, Oughtibridge, Deepcar, Thorpe Hesley, Hoyland and other nearby locations. Several are either committed or already in construction in and around Chapeltown & Ecclesfield alone. It does not seem that the overall traffic impacts of these developments have been acceptably considered in the individual site assessments for the Sheffield Plan.

Of significant concern at proposed site CH04 is the proximity to the M1 which is less than 500 metres away, the existing frequent congestion on Cowley Hill and Nether Lane and the notorious 'rat run' along Cowley Hill/Nether Lane/Mill Lane/Church Street/Town End Road/The Wheel/Wheel Lane. This is a heavily used route between the M1 and Grenoside, Oughtibridge and Bradfield, on which the collision record is particularly poor. This is discussed in more detail below.

Many of the proposed sites are, geographically at least, well-located for access to the strategic road network (M1/A616/A6135/A629), not least site CH04 for which the proposed access is on the A629 less than 500 metres from the M1 slip road at junction 35. The Strategic Route Network (SRN) seems to have been prioritised in the traffic assessments, suggesting that the sites would generate longer distance journeys rather than sustainable travel. The local network's traffic and safety has been largely overlooked. The consultation documents provide no confidence that the local highway network would be able to cope with the increase in traffic demand. Neither is there anything to offer confidence that that local and national Policy and objectives, such as active and sustainable travel, could be achieved.

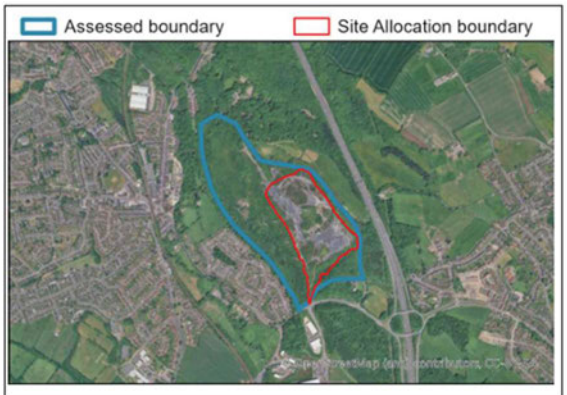
Whilst it must be accepted that building on some Green Field land might offer more variety and choice of homes, and local employment opportunities, this should only be considered over Brown Field/urban development where it is genuinely right to do so.

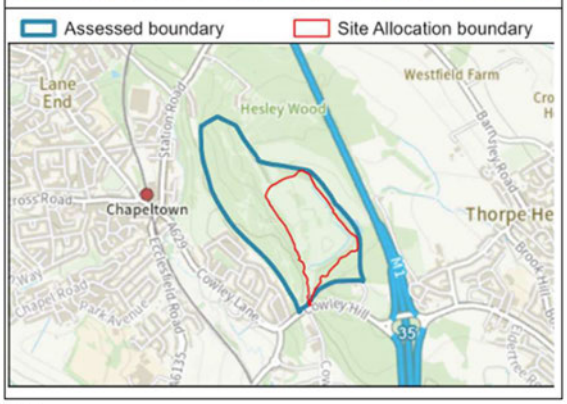
More detail needs to be provided on, and more consideration given to, the impact on the existing local road network and how any proposals taken forward could be mitigated to reduce adverse effects. Should it not be possible to reduce adverse impact to acceptable levels, these sites should be withdrawn and alternatives sought.

In the previous review of the proposed Sheffield Plan (July 2025) Aprica assessed site CH04 (known then as S04639). At that time no access arrangements were available. The earlier assessment is shown below along with the Council's assessment of suitability.

Green Belt site allocation appraisal (Employment)

Site Reference: S04639
Address: Hesley Wood, north of Cowley Hill, S35 2YH
Gross site area (Site Allocation): 15.61 Hectares
Net housing area: 0.00 Hectares
Estimated housing capacity: 0 homes
Net employment area: 13.35 Hectares
Ward: East Ecclesfield Ward
Housing Market Area: Chapeltown & Ecclesfield
Ownership: Private





	Score	
Distance to core public transport network (CPTN)	Y	Some of the site is within the Core Public Transport Network buffer, or within a 400m walk from a 3 bus per hour bus stop
Access to active travel/cycle network	Y	Site within 400m of an existing off-carriageway cycle route
Potential to increase the viability of public transport or support investment in new public transport infrastructure	-	Site is beyond 400m of planned bus network improvement or 800m of planned tram/rail network improvement

- Adjoins M1 Motorway. Contributions may be required to strategic highways improvements at junctions on the M1.
- Some of the site is within the Core Public Transport Network (as of December 2023) or within a 400m walk from a 3 bus per hour bus stop. It is around 1.5km from Chapeltown Railway Station.
- Site is within 400m of a cycle route.

- Potential capacity issues previously identified at junctions (roundabouts) of Burncross Road/Lound Side and Ecclesfield Road/Cowley Lane in Chapeltown town centre (within 2km). Contributions may be required to local highway improvements identified through the additional transport modelling and/or Infrastructure Delivery Plan.

- Contributions are required to strategic highways improvements at junctions on the M1 and the local road network.

Aprica's comments were as follows and largely still stand other than the collision statistics which have been updated:

- The green (Y) rating for proximity to (within 400m) an active travel network is questionable, as it probably refers to the circular Route 67, which is more of a leisure loop around High Green, Wentworth, Thorpe Hesley and Parson Cross. Commuter cyclists are unlikely to find this loop beneficial, attractive, or of use to commute

- Bus travel enhancement is unlikely to be viable, with an unrated score (yellow) for proximity to planned improvements. It is unclear where access would be achieved, but its location(s) could put bus stops over 500m away, and even then the services are only hourly, with no service on Sundays
- Capacity issues have been identified at Burncross Road/Lound Side and Ecclesfield Road/Cowley Lane. Contributions to local highway improvements are mentioned and this should be clarified and confirmed should this proposed site be progressed
- There has been one serious injury collision (two casualties) and three slight injury collisions (four casualties) in the vicinity of what appears to be the proposed access, including one slight injury collision on the M1 offslip (CrashMap 2019-2023) - updated below
- Access appears to be proposed from Cowley Hill but would need to be considered further should this proposed site be progressed.

Because of the concerns raised during the previous hearings, the Inspectors have stated that the final proposals for site CH04 must include 'Golden Rules' main modifications. (now embedded in the Sheffield Plan's own policies following the Inspectors' 2025 findings). The Golden Rules mean that the developer must prove that they can mitigate the impact on local roads. For CH04, this is likely to mean significant mandatory upgrades to the A629 Cowley Hill/Nether Lane corridors and beyond, before the site can be fully occupied. The development will have to provide new or improved publicly accessible green space, such as maintaining or improving wildlife corridors near Hesley Wood and ensuring that public rights of way are protected.

4 ASSESSMENT OF HIGHWAY PROPOSALS FOR SITE CH04

Surrounding Network

Over the years several feasibility studies have been carried out by SCC, and some traffic management schemes have been introduced. For example High Street/St Michael's Road/Wordsworth Avenue traffic calming and improvements for pedestrians. Other studies have not resulted in any improvement schemes being taken forward. These include the High St/Yew Lane/Stocks Hill/Town End Road/Church Street loop, and a number of studies for Church St/Town End Road/The Wheel, where narrow streets, parking, visibility, pedestrian safety and parking have long been a serious concern and remain so. This is partly due to the physical inability to introduce measures due to narrow roads, restricted visibility, tight building lines etc).

New homes, new supermarkets and other new amenities have in recent years all exacerbated the long-standing traffic problems in and around Ecclesfield including the approach roads such as Cowley Hill and Nether Lane. Additional development will no doubt add to these problems, particularly downstream of the M1 where, if mitigation is provided on the M1 roundabout but not on local roads, the local network will become even more congested and tailbacks onto the M1 more frequent.

The M1 Junction 35 (known as the Thorpe Hesley junction) is regularly congested, particularly the northbound offslip for traffic exiting toward Cowley Hill and Nether Lane (A629), and the Smithy Wood Business Park, as well as Thorpe Hesley. There is a bottleneck at the roundabout which meets Cowley Hill. During morning peak hours, particularly, traffic exiting the motorway exceeds the capacity of the roundabout, causing vehicles to queue back onto the main M1. Cowley Hill and

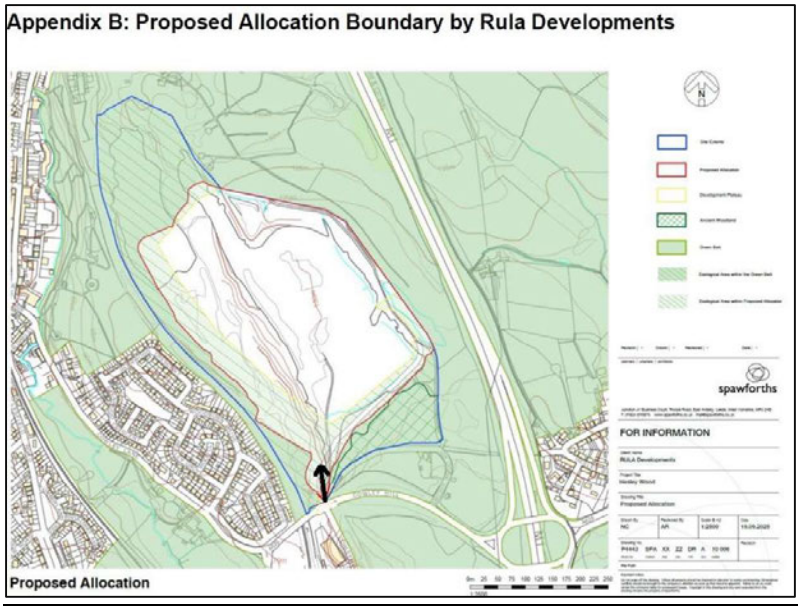
Nether Lane are heavily used by local traffic and when these roads are slow, the roundabout can't clear.

The Smithy Wood Business Park adds HGV's and LGV's to the mix, thereby further slowing the flow of traffic. Smithy Wood Industrial estate. It is understood that SCC has recently granted permission for a charging station for electric HGV's and LGV's on the Smithy Wood site. Whilst this is commendable in terms of the environment it could add hundreds of additional slow-moving vehicle movements around this already congested junction. More commercial development is also said to be in the pipeline for the location, which would add even more slow-moving goods vehicles.

Proposed Access off Cowley Hill

The proposed CH04 site access is opposite Cowley Way, a signalised junction. As mentioned the junction is less than 500 metres from the M1. The junction is regularly gridlocked and an additional access here would be sure to add to congestion especially with high HGV and LGV numbers, and the absence of realistic sustainable travel alternatives to the private car. This is discussed later under Sustainability.

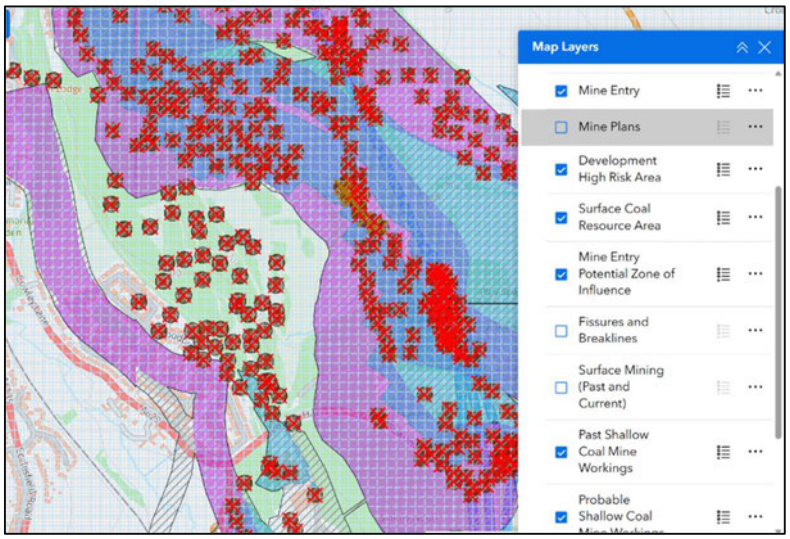
In recent years, National Highways and local Councils have implemented schemes to try and mitigate congestion and M1 tailbacks. Smart Motorway Monitoring has been introduced so that if slip road congestion reaches a certain level, overhead gantries on the M1 trigger speed reductions to manage the flow approaching J35. Improvements such as MOVA (Microprocessor Optimised Vehicle Actuation) have arguably helped to regulate the flow of traffic, they have not resolved the problems because sheer volumes of traffic 'saturate' the junctions. Before any development is approved a full assessment should be carried out to determine what, if anything, can be done to sufficiently mitigate the known traffic problems.



Arrow Shows Proposed Access Point – Spawforth Illustration Annotated

Under the Statement of Common Ground (SOCG) between SCC and Rula Developments, it has been agreed that further mitigation measures will be investigated and funding mechanisms sought. The measures will need to be agreed between SCC, National Highways, and the developer.

The SOCG mentions known mining and waste tipping which has resulted in physical and environmental risks such as buried voids, unstable ground, and contamination. The Government's 'Mining Remediation Authority' map shows the access and the wider site to be subject to 'mine entry', 'development high risk area', 'mine entry potential zone of influence', 'past shallow coal mine workings' and 'probable shallow coal mine workings' status. The Mining Remediation Authority (formerly known as the Coal Authority in the UK) holds the legal right to give or withhold a Permit to disturb the ground. These issues would clearly have to be addressed as part of the decision on whether or not to grant the planning application.



Map of Mining Issues – Gov.uk Mining Remediation Authority

The Flood Risk Assessment (FRA) highlights that there are localised high surface water flood risk areas on the site, and severe run-off is often channelled along the former access road where the new access is proposed. Access would therefore need careful planning to mitigate for water and flooding.

5 SUSTAINABILITY

In the UK, standards for sustainable travel and the hierarchy of travel modes are set by the Department for Transport's (DfT's) Manual for Streets (MfS) and Local Transport Note 1/20 (LTN 1/20). The DfT publishes the National Planning Policy Framework (NPPF). Paragraph 114 explicitly states that applications should "give priority first to pedestrian and cycle movements." The MfS is the go-to guide for urban design. It established the hierarchy that places pedestrians at the top and private cars at the bottom.

Active Travel England (ATE) is the government's Sustainable Travel Inspectorate. It reviews large planning applications (such as CH04) to ensure that they meet these standards. If a site is "car-dependent" ATE can formally object. In terms of a new road for site CH04 ATE have stated that the M1 J35 and the A629 act as a severance barrier, in that if a new road is built, people wishing to walk or cycle to and from work have to navigate hostile and unsafe routes. They require grade-separated (by kerbs for example) or significantly protected pedestrian and cycle crossings to meet national standards (LTN 1/20). ATE have further criticised the site for not having a direct high-quality link to Chapeltown Station and because of the steep hill the site feels isolated. ATE is urging the developer

to fund off-site improvements that extend all the way into Chapeltown centre, using strict set of design standards in Local Transport Note 1/20 (LTN 1/20).

The South Yorkshire Mayoral Combined Authority (SYMCA) has been mandated by the DfT that all local transport authorities are required to review and update their statutory Local Transport Plans (LTP's) to align with current national and local priorities, and to provide a more consistent basis for determining future investment priorities. 'Connecting Sheffield' is part of the long-term vision for the future of travel in the city of Sheffield, creating high-quality, convenient and safer routes into and around the city for cycling, walking and public transport. Funding has been made available, from central Government and other sources, to deliver work that aims to transform the city and enable people to make better travel choices. The website https://haveyoursay.sheffield.gov.uk/connecting-sheffield gives updates on projects. At present there are none in the vicinity of site CH04, or north Sheffield in general, but hopefully a case will be made for at least some studies in the area.

For site CH04 the hierarchy of travel modes – 1. Walking, 2. Cycling & wheeling, 3. Public transport, 4. Private car – needs much more consideration and more detail provided on how active and sustainable travel can genuinely be achieved, before the site progresses. This is explored in more detail below.

The location of site CH04 on a steep hill close to the Motorway network raises concerns that sustainability has not been given due consideration. Employment facilities attract not just freight but also employees, many travelling by private car for reasons such as longer travel distances (via the convenient Motorway) and unsociable hours working (making cycling and public transport impractical or indeed impossible).

Sustainable Travel Modes

1. Walking: Footways on Cowley Hill and Nether Lane lack connection, are non-existent in many places, and are very unattractive for walking up and down the steep Cowley Hill. It is highly unlikely that anyone would walk to the site even with multi-million pound improvements.



Cowley Hill Narrow/Non-Existent Footway Example – Google



Cowley Hill Overgrown Footway - Google

2. Cycling: Much as for walking, the roads are steep in places and there are no cycle friendly measures other than a short, worn out and, more importantly, outdated section of shared use cycleway, which is now not permitted under LTN 1/20. Only the most serious cyclists would be likely to cycle to site CH04 and back. The claim that the site is 'within 400 metres of an active travel network' is very misleading as it can only be referring to the circular NCN Route 67, which is a leisure loop around High Green, Wentworth, Thorpe Hesley and Parson Cross. Commuter cyclists are unlikely to find this loop useful.



Approximately 100m of Worn Shared Use Cycle Lane on Cowley Hill - Google

3. Public Transport: Again SCC's site assessment is misleading. Whilst the 135 is a half-hourly service, and there is a local infrequent service (the 635), the bus stops are woefully poor. The nearest stop for those heading west towards Chapeltown is a steep uphill walk of over 200 metres, or a downhill walk of over 300 metres, to an outdated bus stop. Those heading east have a steep uphill walk of over 300 metres. These measurements are from Cowley Hill only, and do not include the internal site measurements, which could add another 1 kilometre or more depending on the layout. The nearest bus stops on Nether Lane are near The Common, some 1.4 kilometres away.

Current requirements for bus stops are for raised bus boarder kerbs, tactile pavings for partially sighted users, bus stop clearway markings, and preferably shelters. There are none of these at any of the bus stops in question.

Chapeltown Railway Station is around a 1.6km (20 minute) walk away, again not including the internal site distances. which is not at all convenient for rail travel.

4. Private Car: This is highly likely to be the mode of choice for most people accessing the proposed site. It is very close to the Motorway, users could be travelling long distances and/or at unsociable hours, and other travel modes are poor, unattractive or are non-existent.

Trip Generation and TRICS

TRICS is 'Trip Rate Information Computer System'. It is effectively an industry-standard historical library of traffic figures. When developers want to build something new – such as housing or commercial space – they must demonstrate how much extra traffic the development will put on the highway network. Because the development doesn't yet exist the developer uses TRICS and its database to assess and demonstrate what has happened at similar sites in the past.

Whilst TRICS contains thousands of real-world traffic counts from across the UK and Ireland, its outputs are often controversial. Developers naturally want to demonstrate the minimum impact on the highway network and might therefore choose a site that is not entirely comparable. For example the age of the data, type of housing or commercial space, operational hours, sustainable travel options and other factors can all skew the output figures. Critics argue that Planners should design for a typical busy day (called the 85th percentile), whilst Developers prefer to use the average day (the mean) to make the impact look smaller. Thus, in real-world terms actual traffic volumes and impacts are very often significantly worse. Driver and other road user behaviour in 'the real world' is not like a computer model in any case. A regular example would be where drivers stop in long lines of slow-moving main road traffic to let single vehicles in or out of minor junctions, thereby impacting on dozens of following main road vehicles.

Aprica does not have the software or expertise to challenge TRICS (Trip Rate Information Computer System) and to do so would take many hours. It is therefore beyond the remit of this report but the core issue for Site CH04 seems to be the discrepancy between the theoretical model used by SCC and the physical reality of modern logistics. Objectors have argued, in earlier consultations, that SCC has "under-counted" the traffic impacts. This would make the site appear more sustainable than it actually is. TRICS' accuracy is, as described above, based on analysts and Planners picking 'comparable' sites to predict how much and what type of traffic a new one would create. For this specific site critics have argued that SCC has taken 'traditional warehousing' or 'general Industrial' examples whereas site CH04 is more likely to constitute a logistics hub, which would generate significantly higher HGV and LGV movements. By using an inappropriate category the projected vehicle numbers could well be too low.

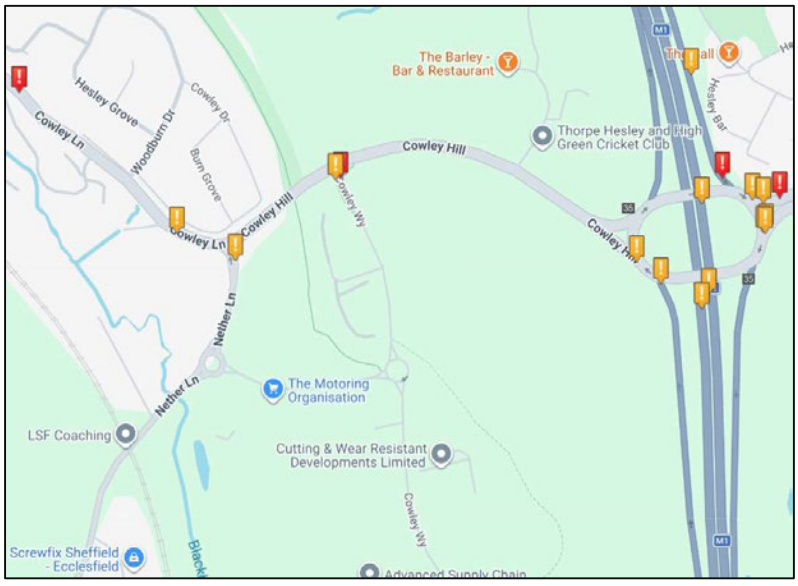
In addition, choosing a 'dissimilar' existing example could skew projected sustainable travel figures. Site CH04 is on a relatively steep, semi-rural edge with limited walking and no real cycling facilities, and inconvenient out of date bus facilities. Using such dissimilar samples constitutes data error. If traditional 8am to 5pm patterns have been used, again this would skew traffic volumes and modes.

The data should be closely checked to ensure its soundness. As mentioned above, experience has shown that in practice actual trip numbers (especially for private vehicles) are very often higher than those suggested in Transport Assessments (TA's). Software can easily be used to manipulate and 'adjust' modelled outcomes, whereas in real-world circumstances, people's behaviour and choices dictate what actually happens.

6 INJURY COLLISION RECORD

'CrashMap' is a website that uses official government data (the STATS19 database) collected by police forces across the country, to allow users to see where, when, and (for a fee) how road traffic collisions (RTC's) are occurring in their local area.

According to 'CrashMap', for the latest verified five year period (2020 to 2024 inclusive) there have been two serious (six casualties) and five slight (eight casualties) injury collisions on Cowley Hill and the top of the M1 slip road. these roads alone (i.e. downstream of the M1 roundabout). Downstream, further along Nether Lane and in & around Ecclesfield and Chapeltown, there have been dozens of recorded injury collisions including two deaths on Nether Lane. Some of these will no doubt be because of the traffic volume and congestion on physically constrained roads.
In terms of the number of injury collisions, it should be noted that although there is little published data on unreported collisions, the Department for Transport (DfT) suggests that '*for every reported and recorded injury collision there could be as many as 5 unreported injury collisions and 20 damage-only collisions*'. Near misses could be as many as 300 per recorded injury collision.



Cowley Lane and Surrounding Area Injury Collisions - CrashMap

7 OTHER FACTORS TO CONSIDER

There are ecological and environmental constraints on site CH04. It is a buffer zone for Smithy Wood, an ancient woodland. A mandatory 15 metre no-build buffer will be required to protect the woodland's root systems and ecosystem from industrial runoff and light pollution, otherwise species loss could

result. In any event it is difficult to imagine how the site could be developed without the loss of significant habitat loss.

In the 2025 Air Quality Annual Status Report (ASR) the area around the M1 Junction J35 remains a hotspot of concern. Air quality at the location heavily dictated by motorway congestion. When the M1 backs up, air quality on Cowley Hill becomes significantly worse. Adding the new commercial development at site CH04 would introduce a significant risk of reversing the downward trend in pollution for the S35 postcode.

8 CONCLUSIONS AND RECOMMENDATIONS

Conclusions

The proposed access from Cowley Hill is arguably unsafe, unproven, topographically constrained, and incompatible with additional vehicle movements including significant numbers of HGV's. Combined with known congestion, the poor collision record, ground condition and environmental risks, the traffic and highways evidence indicates that the proposal is not safe, not compliant with National Planning Policy and probably not deliverable.

Of the 'Four Points' mentioned in Section 3 above, the Inspectors should note the following:

Positively Prepared: The proposals do not meet 'objectively assessed development' or 'infrastructure requirements':

- The assessments appear to have been rushed in effort to meet timescales and are optimistically in favour of the proposed development.
- The major roads seem to have been prioritised in the assessments, whilst the local network's already significant traffic and safety issues have been largely overlooked.
- The consultation documents provide no confidence that the local highway network would be able to cope with the increase in traffic demand. Neither is there anything to offer confidence that that local and national policy and objectives, such as active and sustainable travel, could be achieved.

Justified: The proposals are not based on proportionate evidence:

- The allocation of site CH04 is not supported by proportionate or complete transport evidence. The Transport Assessment Update does not assess the cumulative impact of CH04 alongside major neighbouring developments and its TRICS data input accuracy is questionable. It is possible that the site could generate significantly higher HGV, LGV and private car movements.
- Again if TRICS outputs are not based on like-for-like sites the projected sustainable travel figures are likely to be far too optimistic.

Effective: Deliverable over the plan period:

- The site cannot be made sound without major external highway works and even then would be likely to still present additional hazards and congestion, particularly downstream of the M1. It is therefore unlikely that acceptable proposals, in terms of Policy etc, could be delivered within an agreed period, if at all.

Consistent with National Policy: The proposals are not consistent with Policy such as the NPPF.

- The proposals do not offer sustainable transport improvements in an area where they are woefully inadequate at present.
- The proposals would have an unacceptable impact on traffic and road safety for the local highway network and its residents. The proposed location of the access presents a clear hazard for Motorway slip road traffic and should not be agreed in its present position. The injury collision record demonstrates an existing level of risk that would only be increased by additional site traffic.
- In terms of sustainability, walking to the site is unlikely due to the poor and unconnected footways, the steep gradients involved, and the significant traffic volumes close-by to those walking. There is no cycle infrastructure other than a short section of inadequate and outdated shared-use cycle lane at the Cowley Way signals. Bus services are not infrequent but the bus stops are not convenient and are nowhere near to an acceptable standard. Rail access is impractical at 1.6km away. The site would therefore be overwhelmingly car-dependent for those not travelling in HGV's or LGV's.
- Active Travel England (ATE) requires developments to enable at least 50% of short trips by sustainable modes by 2030. The consultation documentation presents no indication of any chance of achieving this.
- No evidence is provided showing how LTN 1/20-compliant cycle infrastructure could be delivered.

Recommendations

The allocation of Site CH04 should be removed from the Sheffield Plan, due to likely road safety hazards, unmitigable constraints on the local highway network, and failure to be able to meet sustainability requirements.

There is an obvious need for much work and improvement to be carried out on the proposed measures and the proposed mitigation. If, contrary to the above recommendation, the site is retained a safer alternative access point should be investigated. Should any development go ahead Grampian-style Conditions need to be imposed such that no development can commence until the issues of safety, traffic impact, sustainability and other concerns have been fully addressed and works completed, including suitable measures in the wider local highway network area. If this is not possible the site should not proceed.

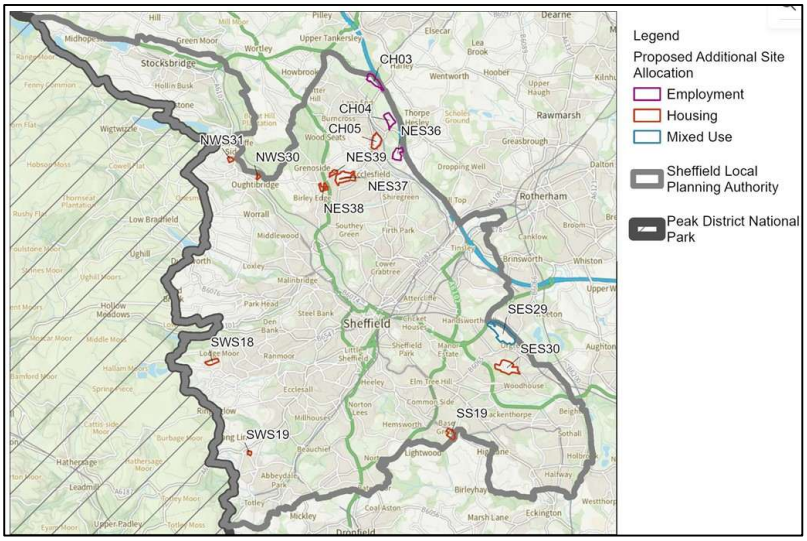
If sustainability aims are to be anywhere near successful, a robust Sustainability Strategy must be prepared in order to provide direct, safe walking and cycling links to Ecclesfield, Chapeltown etc via new and improved footways, segregated LTN 1/20-compliant cycle infrastructure, and improved bus infrastructure with fully compliant bus stops and shelters (raised bus boarder kerbs, tactile pavings, bus stop clearways). These measures must also be enshrined in Grampian Planning Conditions.

More robust and accurate assessment needs to be made of the likely cumulative impact on the wider highway network, capturing realistic site CH04 traffic including HGV and LGV flows resulting from modern logistics use, known existing traffic problems, known committed residential and commercial developments in Ecclesfield, Chapeltown, Thrope Hesley etc.

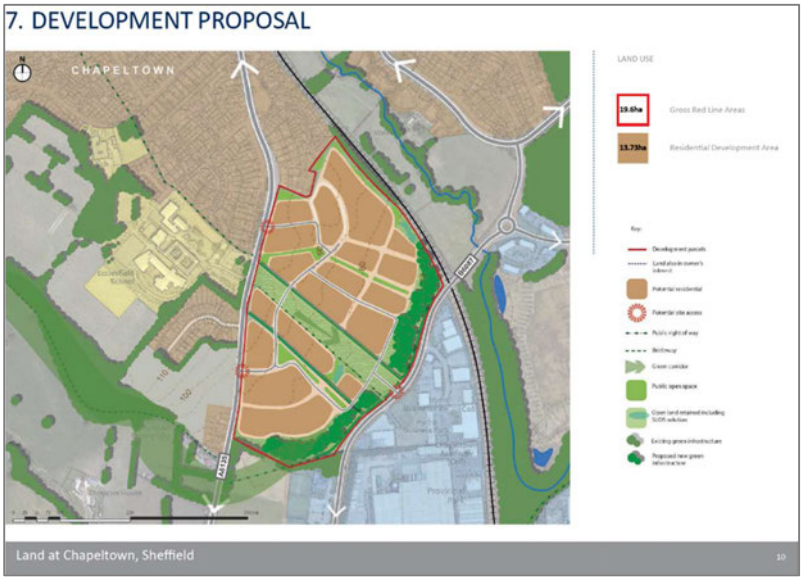
“The Sheffield Plan”

Review of Proposed Junction for Site CH05
‘Land to the east of Chapeltown Road, S35 9ZX’

(also previously referred to by Sheffield City Council as Site S03038)



Map of Sites – SCC



Proposed Site Accesses – DLP Planning ltd for Limes Developments ltd

April 2026

1 TERMS OF REFERENCE

Aprica ltd has been commissioned by a local interest group to comment on the highway implications for the proposed junction arrangement at Site CH05 (also previously known as site SO3038) 'Land to the east of Chapeltown Road, S35 9ZX', hereafter referred to as 'CH05', one of the sites identified in the proposed 'Sheffield Plan' ('the Plan') Consultation Documents.

The purpose of this report to is assess the transport and traffic implications of the current proposal. It is intended that this report be considered by the interest group with a view to submitting a formal response to Sheffield City Council ('SCC'). The report is based on local knowledge, prevailing highway conditions and available documents, illustrative drawings etc.

Ian Taylor (I.Eng MICE) has produced this report. Ian is an Incorporated Engineer and a Member of the Institution of Civil Engineers, with thirty-five years' experience of public and private sector highway infrastructure disciplines including transportation planning, RoSPA accredited accident investigation & prevention, traffic management, road safety audits, traffic regulations, and highway design & construction. Ian has led on numerous major highway projects for Local Authorities and has presented at Planning Committees, Council meetings, public meetings and drop-in events, and at Public Inquiry.

2 INTRODUCTION

The scope of this report is to consider the proposed 'Main Modifications' for the Sheffield Plan (the Plan), for site CH05, a site of 19.62 hectares, proposed for the construction of 549 dwelling. The intention is to offer expert comments on the site's safe and practical useability by the travelling public, and the impact on the highway network.

For ease of reference this report is separated into the following parts:

1 Terms of Reference

2 Introduction and Executive Summary

3 Background

4 Assessment of Highway Proposals

5 Sustainability

6 Injury Collision Record

7 Other Factors to Consider

8 Conclusions and Recommendations

EXECUTIVE SUMMARY

This report provides an independent review of the highway and transport implications of the proposed access arrangements for the Sheffield Plan allocation CH05 “Land to the east of Chapeltown Road, S35 9ZX”; previously S03038, proposed for around 549 dwellings on 19.62 hectares. It considers whether the emerging access strategy is safe, practical and policy-compliant, and whether the evidence is proportionate at Plan stage given the Inspectors’ “Golden Rules” requiring impacts to be demonstrably mitigated and sustainable travel to be achievable.

Key findings

- The A6135/B6087 corridor and wider Chapeltown/Ecclesfield network is already heavily congested (including school peaks and M1 diversion periods), leaving limited operational capacity.
- Safe, workable access arrangements have not yet been demonstrated; key matters (visibility, junction form, capacity and queuing interaction) are deferred to a future Transport Assessment.
- Sustainable travel evidence is weak: walking/cycling conditions are constrained and delivering LTN 1/20-compliant cycling infrastructure on these corridors appears challenging; bus/rail accessibility is variable and, in places, beyond walking distance thresholds.
- Road safety is a material consideration: CrashMap (2020–2024) indicates multiple injury collisions on Chapeltown Road and Nether Lane, including a fatality on Nether Lane, reinforcing the need for robust design and mitigation.

Implications for the Sheffield Plan (Regulation 19)

As presented, the allocation is not yet supported by sufficiently specific transport evidence to robustly demonstrate that it is *justified*, *effective* and *consistent with national policy*, or that the Golden Rules can be met.

Recommendations

- Before confirming allocation, the site requires a robust and agreed Transport Assessment showing safe access design, acceptable junction/network operation and realistic cumulative impacts.
- Secure deliverable mitigation should be secured by enforceable pre-commencement (Grampian style) requirements for off-site highway works, safety measures and monitoring.
- A credible sustainable travel package (walking/wheeling/cycling links and compliant bus stop upgrades).

If these recommendations cannot be demonstrated and delivered, remove, reduce or reconfigure site CH05.

3 BACKGROUND

Planning Inspectors have considered the 'Sheffield Plan' (the Plan) proposals under a number of stages of the Planning process. This stage is 'Regulation 19' of The Town and Country Planning (Local Planning) (England) Regulations 2012. Regulation 19 focuses on four main tests, the previous comments and objections etc already having been considered in what is effectively the Planners' agreed shortlist of sites with potential but requiring further assessment and consideration. The Inspectors are unlikely to consider previous comments, since they have already considered them in shortlisting, and will now consider the four tests, namely that the Plan must be: **Positively Prepared:** Based on a strategy that seeks to meet objectively assessed development and infrastructure requirements; **Justified:** Based on proportionate evidence; **Effective:** Deliverable over the plan period; **Consistent with National Policy** (such as the National Planning Policy Framework (NPPF).

The Inspectors consider the Plan to be 'sound and legally compliant subject to some modifications being agreed and made'. The modifications must undergo sustainability appraisal, habitats assessment, and public consultation. The Inspectors will essentially seek to determine whether adding sites, such as CH05, makes the plan 'more sound' (by meeting employment needs etc), or 'unsound' by creating unmitigable traffic issues.

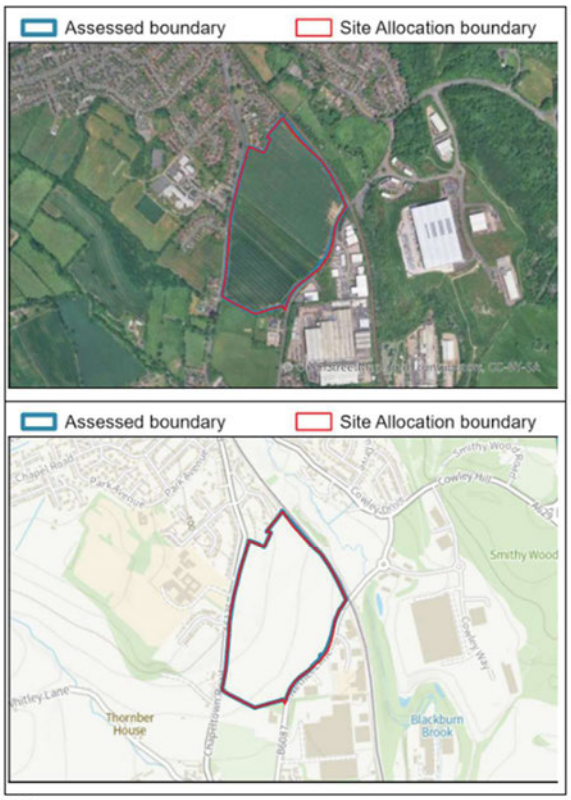
The proposals still lack detail on, for example, precise numbers and layout of houses, number of people employed, acceptable likely trip data (see below under TRICS), which makes it difficult for Inspectors to make a final decision, and for consultees to offer fully considered responses. Neither is there sufficient mention, or demonstrable evidence, of the possible cumulative effect of the addition of the proposed greenfield sites to the many other committed and ongoing developments in and around Chapeltown and Ecclesfield, for example those in Grenoside, Oughtibridge, Deepcar, Thorpe Hesley, Hoyland and other nearby locations. Several are either committed or already in construction in and around Chapeltown and Ecclesfield alone. It does not seem that the overall traffic impacts of these developments have been sufficiently considered in the individual site assessments for the Sheffield Plan, or as a whole.

Whilst it must be accepted that building on some Green Field land might offer more variety and choice of homes, and local employment opportunities, this should only be considered over Brown Field/urban development where it can be achieved without significant impact at the proposed site and in the wider area. More detail needs to be provided on, and more consideration given to, the impact on the existing local road network and how any proposals taken forward could be mitigated to eliminate or sufficiently reduce adverse effects. Should it not be possible to reduce adverse impacts to acceptable levels, these sites should be withdrawn and alternatives sought.

In the previous review of the proposed Sheffield Plan (July 2025) Aprica assessed site CH05 (known then as S03038). At that time no access arrangements were available. The earlier assessment is shown below along with the Council's assessment of suitability. Aprica's comments follow and largely still stand other than the collision statistics which have been updated, and the now identified proposed site accesses.

Green Belt site allocation appraisal (Housing)

Site Reference: S03038
Address: Land to the east of Chapeltown Road, S35 9ZX
Gross site area: 19.62 Hectares
Net housing area: 13.73 Hectares
Estimated housing capacity: 549 homes
Net employment area: 0.00 Hectares
Ward: East Ecclesfield Ward
Housing Market Area: Chapeltown & Ecclesfield
Ownership: Private



Distance to core public transport network (CPTN)	Y	Some of the site is within the Core Public Transport Network buffer, or within a 400m walk from a 3 bus per hour bus stop
Access to active travel/cycle network	Y	Site within 400m of an existing off-carriageway cycle route
Potential to increase the viability of public transport or support investment in new public transport infrastructure	-	Site is beyond 400m of planned bus network improvement or 800m of planned tram/rail network improvement
Availability of local facilities and education capacity	YY	Site within 800m of 4 classes of local facility
	N	No current surplus capacity for either Primary or Secondary education
	YY	No community/leisure/recreation facilities on-site

- Part of the site is around 800m of Chapeltown railway station, and the entire site is within 1.6km.
- Some of the site is within 400m of the Core Bus Network (as at December 2023).
- Site is within 400m of an active travel/cycle network. Footpaths on site should be retained.

- Site is within 10-minute walk (800 metres) of a convenience shop and at least 3 other types of community facilities or important local services within Chapeltown.
- There is a primary school within 3.2km of the site (although no surplus capacity).
- There is a secondary school within 4.8km of the site (although no surplus capacity).
- There is a primary health care facility within 3.2km of the site.

- Potential capacity issues previously identified at the junctions of A6135 Ecclesfield Road / A629 Cowley Lane and Burncross Road / Lound Side in the centre of Chapeltown.
- Site is within 5km of an M1 junction.

Aprica comment:

- The site is rated green (Y) for proximity to an active travel network, being within 400m of an existing or proposed cycle route. The reference is likely to be to Route 67, which is more of a circular leisure loop around High Green, Wentworth, Thorpe Hesley and Parson Cross. Commuter cyclists are unlikely to find this loop beneficial, attractive, or of use for commuting
- Bus travel enhancement is unlikely to be viable, with an unrated (yellow) rating for proximity to planned improvements. The stated distance from a bus stop (400m) would depend on where access was achieved. Sunday services are hourly at best, and in some cases none
- School and healthcare facilities have a negative (N) rating and are too far away for sustainable travel and in any event the schools are full
- The site is rated double-positive (YY) for community/leisure/recreation facilities yet it is stated that there are none. This needs clarification

- There has been one slight injury on the roads in question, specifically Nether Lane (CrashMap 2019-2023)
- ~~Accesses onto Chapeltown Road/Ecclesfield Road and Nether Lane are not identified and would need to be considered further should this proposed site be progressed.~~

Because of the concerns raised during the previous hearings, the Inspectors have stated that the final proposals for site CH05 must include 'Golden Rules' main modifications. (now embedded in the Sheffield Plan's own policies following the Inspectors' 2025 findings). The Golden Rules mean that the developer must prove that they can mitigate the impact on local roads. For CH05, this is likely to mean safety and capacity improvements on Chapeltown Road and Nether Lane as well as at strategic junctions and bottlenecks. Active travel measures are also likely to be required.

4 ASSESSMENT OF HIGHWAY PROPOSALS FOR SITE CH05

Surrounding Network

Over the years several feasibility studies have been carried out by SCC, and some traffic management schemes have been introduced. For example High Street/St Michael's Road/Wordsworth Avenue traffic calming and improvements for pedestrians. Other studies have not resulted in any improvement schemes being taken forward. These include the High St/Yew Lane/Stocks Hill/Town End Road/Church Street loop, and a number of studies for Church St/Town End Road/The Wheel, where narrow streets, parking, visibility, pedestrian safety and parking have long been a serious concern and remain so. This is partly due to the physical inability to introduce measures due to narrow roads, restricted visibility, tight building lines etc).

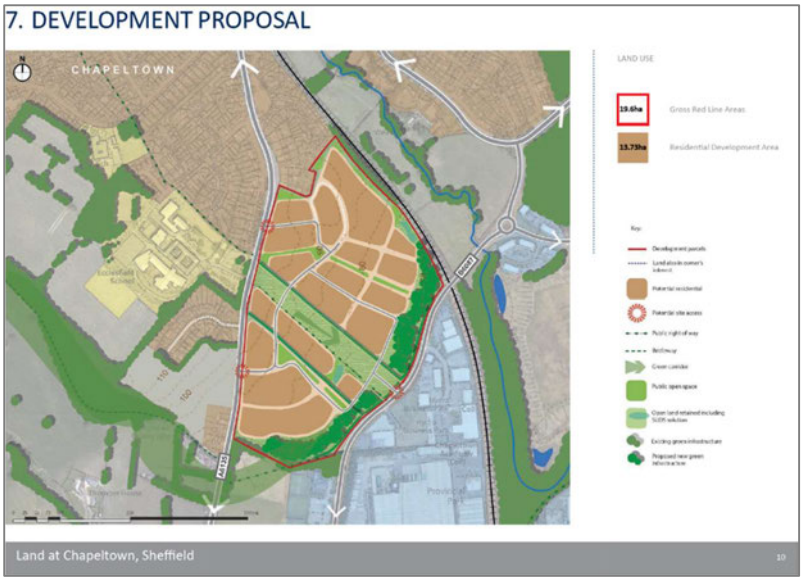
In Chapeltown the approaches to the central roundabout, particularly on the A6135 Station Road and Lound Side, are bottlenecks and become congested with through traffic and those seeking to park for the railway station, school and shops. The area is a popular diversion for Motorway traffic during busy times on the M1. The M1 is regularly congested and Junctions 35 and 36 offer a convenient diversion onto local roads, adding motorway traffic to the mix. The junctions themselves are regularly congested, and tailbacks can reach all the way along Nether Lane and into Ecclesfield, as well as along the A629 into Chapeltown. The A6135 The Common/Chapeltown Road/Ecclesfield Road suffers regular congestion and is one of the most notorious in North Sheffield. New homes, supermarkets and other new amenities have in recent years all exacerbated the long-standing traffic problems in and around Chapeltown and Ecclesfield.

Statement of Common Ground (SOCG)

The SOCG between SCC and Limes Developments ltd states that '*SCC is satisfied that, subject to further technical discussions at the pre-application and application stages, the site can be safely accessed from both Chapeltown Road and Nether Lane but that final confirmation of access arrangements will be provided through a detailed Transport Assessment at the planning application stage; The site is close to regular bus services connecting it to Chapeltown, Ecclesfield, and Sheffield City Centre.; It is within walking distance of Chapeltown Railway Station, supporting sustainable travel options for future residents*;' This is surprising considering a number of important factors which are discussed in the relevant sections below, and include infrastructure which is already under severe strain, the coalescence of settlements and other developments already taking place in the area.

Proposed Accesses off Chapeltown Road

There are two proposed accesses off Chapeltown Road. One is around 800 metres south of the Chapeltown Roundabout and the other is around 500 metres north of the Church Street junction.



Proposed Site Accesses – DLP Planning ltd for Limes Developments ltd

Chapeltown Road, part of the A6135 corridor linking Sheffield with the M1 Junction 36 'Tankersley Junction'. The road is highly congested during busy times but suffers road safety and speeding problems during off-peak times. There is a safety camera just a few hundred metres north of one of the proposed accesses. The collision statistics are discussed in more detail below.

Until the above-mentioned Transport Assessment is produced and agreed, there is no certainty that the locations of the accesses are suitable. Ecclesfield School (the largest secondary school in Sheffield with over 1700 pupils) is located between the two proposed accesses on Chapeltown Road. Traffic at school start and end times and commuter rush hour results in all the roads around the area becoming gridlocked, particularly Chapeltown Road, Ecclesfield Road, Nether Lane, Cowley Lane and Station Road. Parking near the school at drop off and pick up times causes Chapeltown Road to narrow significantly, reducing traffic flow to single way working. Whilst the footways on Chapeltown Road are generally quite wide, they are in places narrowed by features such as grass verges and overgrown foliage.

Proposed Access off Nether Lane

Nether Lane is a busy 'B' road (B6087) and forms part of the notorious 'rat run' along Cowley Hill/Nether Lane/Mill Lane/Church Street/Town End Road/The Wheel/Wheel Lane. It is part of a key local distributor route which operates close to and sometimes over-capacity and nether Lane becomes gridlocked. Existing congestion on the route materially constrains the local network and undermines junction performance at the M1.

5 SUSTAINABILITY

In the UK, standards for sustainable travel and the hierarchy of travel modes are set by the Department for Transport's (DfT's) Manual for Streets (MfS) and Local Transport Note 1/20 (LTN 1/20). The DfT publishes the National Planning Policy Framework (NPPF). Paragraph 114 explicitly states that applications should "give priority first to pedestrian and cycle movements." The MfS is the go-to guide for urban design. It established the hierarchy that places pedestrians at the top and private cars at the bottom.

Active Travel England (ATE) is the government's Sustainable Travel Inspectorate. It reviews large planning applications (such as CH05) to ensure that they meet these standards. If a site is too 'car-dependent' ATE can formally object. ATE note that Site CH05 is physically separated from Ecclesfield by steep topography and existing boundary lines. They have demanded that the site must have multiple high-quality pedestrian and cycle access points. They are concerned that if the only way in and out is via the busy A6135, residents and visitors will default to driving, even for short trips to the local shops. ATE mandate that all cycling infrastructure provided must meet LTN 1/20 standards. This includes physically segregated cycle tracks rather than the outdated shared use facilities which comprise painted lines and offer little protection from vehicles. Given the narrowness of parts of the A6135 and the B6087 Nether Lane, it would seem difficult if not physically impossible to provide safe, compliant cycling infrastructure without further impacting the already restricted vehicle capacity.

The South Yorkshire Mayoral Combined Authority (SYMCA) has been mandated by the DfT that all local transport authorities are required to review and update their statutory Local Transport Plans (LTP's) to align with current national and local priorities, and to provide a more consistent basis for determining future investment priorities. 'Connecting Sheffield' is part of the long-term vision for the future of travel in the city of Sheffield, creating high-quality, convenient and safer routes into and around the city for cycling, walking and public transport. Funding has been made available, from central Government and other sources, to deliver work that aims to transform the city and enable people to make better travel choices. The website https://haveyoursay.sheffield.gov.uk/connecting-sheffield gives updates on projects. At present there are none in the vicinity of site CH05 or north Sheffield in general, but hopefully a case will be made for at least some studies in the area.

For site CH05 the hierarchy of travel modes – 1. Walking, 2. Cycling & wheeling, 3. Public transport, 4. Private car – needs much more consideration and more detail provided on how active and sustainable travel can genuinely be achieved, before the site progresses. This is explored in more detail below.

The location of site CH05 bordered by a very busy A road and quite a steep narrow B road raises concerns that sustainability has not been given due consideration or will be achievable.

Sustainable Travel Modes

1. Walking: Whilst the footways on Chapeltown Road are generally quite wide, they are in places narrowed by features such as grass verges and overgrown foliage. The volume of traffic on this busy A road, however, would be a strong limiting factor in people choosing to walk. Whilst physical improvements could be made to the footways, little or nothing could be done to remove or reduce

the proximity of high volumes of traffic and possible speeding vehicles from passing close to pedestrians.



Chapeltown Road Restricted Footway - Google

Footways on Nether Lane lack connection, are non-existent in places, and are very unattractive for walking. Again it is highly unlikely that anyone would walk to and from the site even if significant improvements were made. This seems physically impossible due to its narrowness.



Narrow Footway on Nether Lane - Google

2. Cycling: Much as for walking, the roads are steep in places and there are no cycle measures whatsoever. Only the most serious cyclists would be likely to cycle to site CH05 and back. The claim that the site is 'within 400 metres of an active travel network' is very misleading as it can only be referring to the circular NCN Route 67, which is a leisure loop around High Green, Wentworth, Thorpe Hesley and Parson Cross. Commuter cyclists are unlikely to find this loop useful.

3. Public Transport: Bus services along Chapeltown Road are frequent but those on Nether Lane are not. The only bus stops on Nether Lane are the two near The Common, some 600 metres or so away from the proposed access. Add to this a potential 500 metres or so from the furthest points

within the site and bus users could be looking at a 1km walk, much further than the Nationally recognised acceptable maximum of 400 metres.
Most of the bus stops on Chapeltown Road and both of those on Nether Lane are outdated and not compliant with current requirements for raised bus boarder kerbs, tactile pavings for partially sighted users, bus stop clearway markings, and preferably shelters unless the stops are 'alighting only'.

Chapeltown Railway Station is a potential 20 minute walk (1.6km or so) away, which is not at all convenient for walking to the station even if the suggested dedicated walking route is provided. There is no car park at the station so those driving there would probably park on-street, adding to the traffic problems.

4. Private Car: Since sustainable travel modes are poor, unattractive or are non-existent, the car is highly likely to be the main mode of transport for people living in or visiting the houses on the proposed site.

Trip Generation and TRICS

TRICS is 'Trip Rate Information Computer System'. It is effectively an industry-standard historical library of traffic figures. When developers want to build something new – such as housing or commercial space – they must demonstrate how much extra traffic the development will put on the highway network. Because the development doesn't yet exist the developer uses TRICS and its database to assess and demonstrate what has happened at similar sites in the past.

Whilst TRICS contains thousands of real-world traffic counts from across the UK and Ireland, its outputs are often controversial and site CH05 is no exception. ATE has challenged the TRICS numbers on the grounds of the site not being as sustainable as the 'test' sites. and do not reflect the reality of the current congestion in the area. Developers naturally want to demonstrate the minimum impact on the highway network and might naturally cherry pick test sites. Critics argue that Planners should design for a typical busy day (called the 85th percentile), whilst Developers prefer to use the average day (the mean) which makes the impact look smaller. Thus, in real-world terms actual traffic volumes and impacts are very often significantly worse. Driver and other road user behaviour in 'the real world' is not like a computer model in any case. A common example would be where drivers stop in long lines of slow moving main road traffic to let single vehicles in or out of minor junctions, thereby impacting on dozens of following main road vehicles.

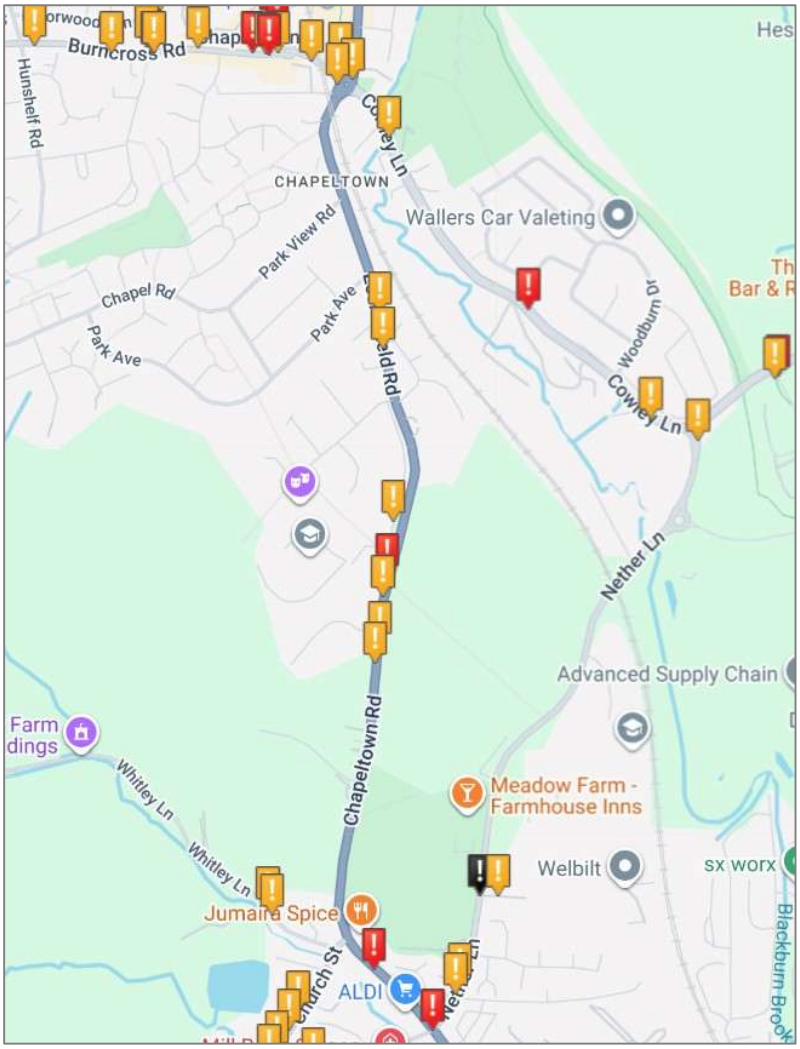
Aprica does not have the software or expertise to challenge TRICS (Trip Rate Information Computer System) and to do so would take many hours. It is therefore beyond the remit of this report but the core issue for Site CH05 seems to be the discrepancy between the theoretical model used by SCC and the likely reality of modal transport choice.

The data should be closely checked to ensure its soundness and, if necessary, re-run using data appropriate for busy congested roads such as those around site CH05. As mentioned above, experience has shown that in practice actual trip numbers (especially for private vehicles) are very often higher than those suggested in Transport Assessments (TA's). Software can easily be used to manipulate and 'adjust' modelled outcomes, whereas in real-world circumstances, people's behaviour and choices dictate what actually happens.

6 INJURY COLLISION RECORD

'CrashMap' is a website that uses official government data (the STATS19 database) collected by police forces across the country, to allow users to see where, when, and (for a fee) how road traffic collisions (RTC's) are occurring in their local area.

According to 'CrashMap', for the latest verified five-year period (2020 to 2024 inclusive) there have been three serious casualties and seven slight casualties on Chapeltown Road (between the Chapeltown Roundabout and Nether Lane). On Nether Lane there has been a fatality and four slight injuries. In terms of the number of injury collisions, it should be noted that although there is little published data on unreported collisions, the Department for Transport (DfT) suggests that '*for every reported and recorded injury collision there could be as many as 5 unreported injury collisions and 20 damage-only collisions*'. Near misses could be as many as 300 per recorded injury collision.



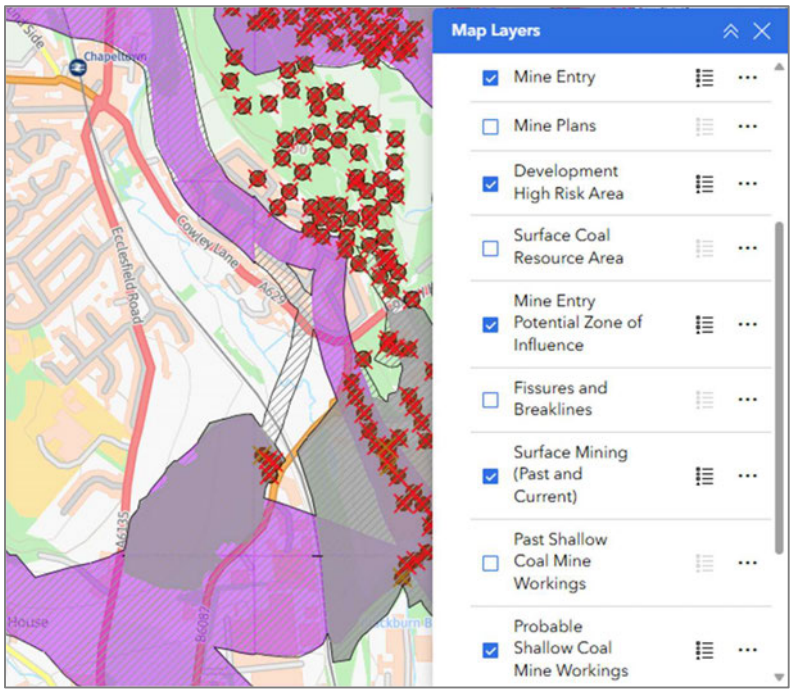
Injury Collisions on Chapeltown Road and Nether Lane - CrashMap

7 OTHER FACTORS TO CONSIDER

The National Planning Policy Framework (NPPF) and SCC' own Policies resist the coalescence of settlements and Greenbelt land is scored in terms of importance against such sprawl. Site CH05 is said to be one of the last remaining parcels of land providing such an essential gap, apparently the highest scoring (score 17) site for Greenbelt purposes.

Mining

The Government's 'Mining Remediation Authority' map shows the access and the wider site to be subject to 'mine entry', 'development high risk area', 'mine entry potential zone of influence', 'surface mining' and 'probable shallow coal mine workings' status. The Mining Remediation Authority (formerly known as the Coal Authority in the UK) holds the legal right to give or withhold a Permit to disturb the ground. These issues would clearly have to be addressed as part of the decision on whether or not to grant the planning application.



Map of Mining Issues – Gov.uk Mining Remediation Authority

Flooding

No Flood Risk Assessment (FRA) or Sustainable Drainage (SuDS) strategy has yet been presented for the site, which has potential for increased surface water runoff into Nether Lane and Blackburn Brook. Chapeltown itself is prone to flood risk. Any proposed access would need careful planning to mitigate for water and flooding.

There are ecological and environmental constraints on site CH05 which would need to be factored in when designing the internal layout. For example a mandatory 15 metre no-build buffer would probably be required to protect the ancient woodland status. Animal species including bats would also need to be considered when designing street lighting etc.

Air Quality

The area around the site (because of the A6135 and local congestion) is an Air Quality Management Area (AQMA) and mitigation would probably need to include electric vehicle (EV) chargers, Travel Plans and financial incentives for new residents. Sadly Travel Plans are notorious for failing and low uptake on incentives, and rarely if ever enforced. All the more reason, therefore, for genuinely achievable sustainability measures to be paramount. If such measures cannot be guaranteed the site should be withdrawn.

8 CONCLUSIONS AND RECOMMENDATIONS

Conclusions

More evidence needs to be provided, bearing in mind the known issues around site CH05, that the proposed accesses would be safe. Currently further development at this location would seem inappropriate based on the known congestion and the poor collision record. Proposals would need to be compliant with National Planning Policy and are probably not physically deliverable given the available highway widths etc.

Of the 'Four Points' mentioned in Section 3 above, the Inspectors should note the following:

Positively Prepared: The proposals do not currently meet 'objectively assessed development' or 'infrastructure requirements':

- The assessments appear to have been rushed in effort to meet timescales and seem optimistically in favour of the proposed development.
- The Strategic Highway Network (SRN), particularly the M1, seems to have been prioritised in the assessments whilst the local network's already significant traffic and safety issues have been largely overlooked.
- The consultation documents provide no confidence that the local highway network would be able to cope with the increase in traffic demand. Neither is there anything to offer confidence that that local and national policy and objectives, such as active and sustainable travel, could be achieved.

Justified: The proposals are not based on proportionate evidence:

- The allocation of site CH05 is not currently supported by proportionate or complete transport evidence. The cumulative impact of CH05, alongside major neighbouring developments, in an already badly congested area, is concerning TRICS data is questionable and it is possible that the site could generate significantly higher traffic movements, particularly by private car.
- If TRICS outputs are not based on like-for-like sites the projected sustainable travel figures are likely to be far too optimistic.

Effective: Deliverable over the plan period:

- The site cannot be made safe and sound without major external highway works and even then would be likely to still present additional hazards and congestion. It is therefore unlikely that acceptable proposals, in terms of Policy etc, could be delivered within an agreed period, if at all.

Consistent with National Policy: The proposals are not consistent with Policy such as the NPPF.

- The proposals do not offer sustainable transport improvements in an area where they are woefully inadequate at present.
- The proposals would have an unacceptable impact on traffic and road safety for the local highway network and its residents. The proposed locations of the accesses present potential hazards in an area with an already poor collision record.
- In terms of sustainability, walking to and from the site is unlikely due to the unattractive footways where significant traffic volumes pass close-by to those walking. Footways are narrow or non-existent in places. There is no cycle infrastructure at all and no evidence is provided to demonstrate how LTN 1/20-compliant cycle infrastructure could be delivered.
- Bus services are not infrequent on Chapeltown Road but they are on Nether Lane. The bus stops are not particularly convenient and are nowhere near to an acceptable standard. Rail access is impractical at 1.6km away.
- Active Travel England (ATE) requires developments to enable at least 50% of short trips by sustainable modes by 2030. There is no indication of any chance of achieving this.
- The site would be overwhelmingly car-dependent.

Recommendations

The allocation of Site CH05 should be very carefully assessed for safe and sustainable travel to be a completely realistic proposition. If no such proof can be provided, the site should be removed from the Sheffield Plan due to likely road safety hazards, unmitigable constraints on the local highway network, and failure to be able to meet sustainability requirements.

Should any development go ahead Grampian-style Conditions need to be imposed such that no development can commence until the issues of safety, traffic impact, sustainability and other concerns have been fully addressed and works completed, including suitable measures in the wider local highway network area. If this is not possible the site should not proceed.

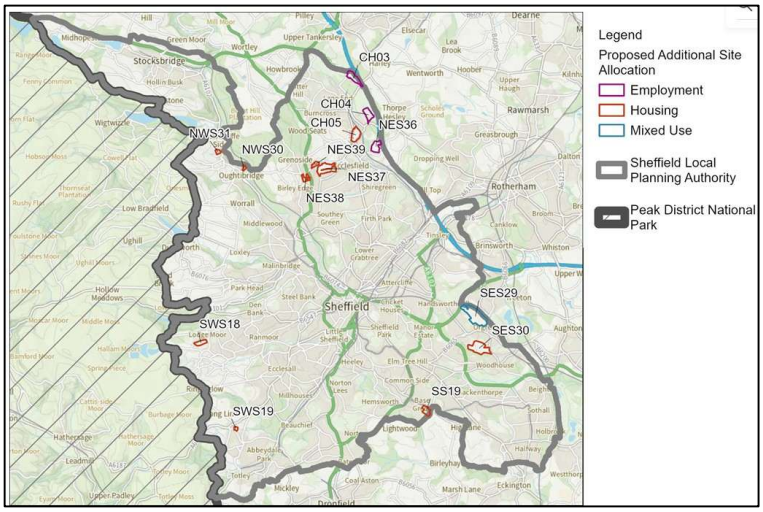
If sustainability aims are to be anywhere near successful, a robust Sustainability Strategy must be prepared in order to provide direct, safe walking and cycling links to Ecclesfield, Chapeltown, the railway station etc. via new and improved footways and paths, segregated LTN 1/20-compliant cycle infrastructure, and improved bus infrastructure with fully compliant bus stops and shelters (raised bus boarder kerbs, tactile paving, bus stop clearways). These measures should also be enshrined in Grampian Planning Conditions.

More robust and accurate assessment needs to be made of the likely cumulative impact on the wider highway network, capturing realistic site CH05 traffic, known existing traffic problems, and known committed residential and commercial developments in Ecclesfield, Chapeltown, Thorpe Hesley etc.

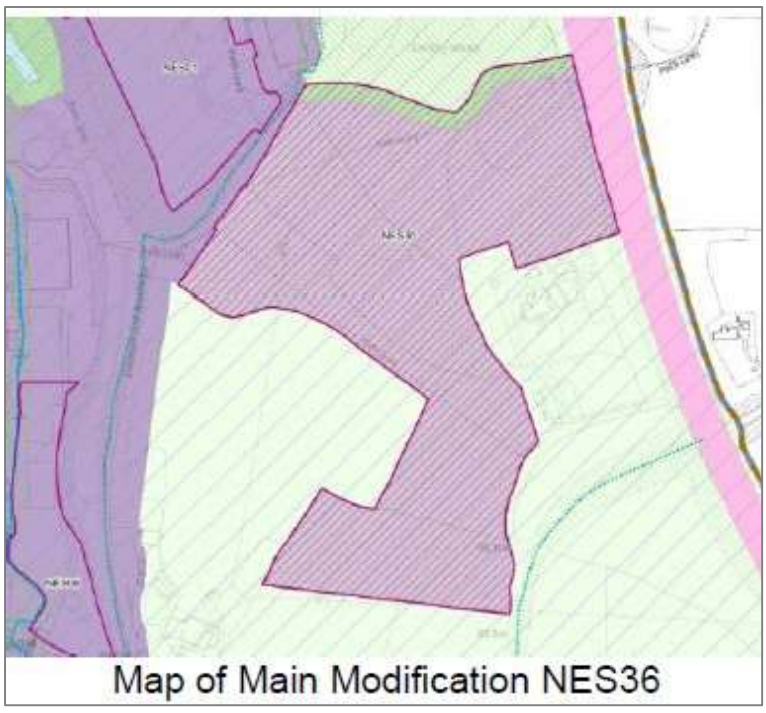
“The Sheffield Plan”

Review of Proposed Access Arrangements for Site NES36 ‘Land to the south of the M1 Motorway Junction 35, S35 1QP’

(also previously referred to by Sheffield City Council as Site S04101)



Map of Sites – SCC



NES36 Site Boundary – SCC

April 2026

1 TERMS OF REFERENCE

Aprica ltd has been commissioned by a local interest group to comment on the highway implications for the proposed access arrangements for Site NES36 'Land to the South of the M1 Motorway Junction 35, S35 1QP' hereafter referred to as 'NES36', one of the sites identified in the proposed 'Sheffield Plan' ('the Plan') Consultation Documents.

The purpose of this report to is assess the transport and traffic implications of the current proposal. It is intended that this report be considered by the interest group with a view to submitting a formal response to Sheffield City Council ('SCC'). The report is based on local knowledge, prevailing highway conditions and available documents, illustrative drawings etc.

Ian Taylor (I.Eng MICE) has produced this report. Ian is an Incorporated Engineer and a Member of the Institution of Civil Engineers, with thirty-five years' experience of public and private sector highway infrastructure disciplines including transportation planning, RoSPA accredited accident investigation & prevention, traffic management, road safety audits, traffic regulations, and highway design & construction. Ian has led on numerous major highway projects for Local Authorities and has presented at Planning Committees, Council meetings, public meetings and drop-in events, and at Public Inquiry.

2 INTRODUCTION

The scope of this report is to consider the proposed 'Main Modifications' for the Sheffield Plan (the Plan), for site NES36, a site of 11.15 hectares, proposed for logistics and warehousing. The intention is to offer expert comments on the site's safe and practical useability by the travelling public, and the impact on the highway network.

For ease of reference this report is separated into the following parts:

1 Terms of Reference

2 Introduction and Executive Summary

3 Background

4 Assessment of Highway Proposals

5 Sustainability

6 Trip Generation and TRICS

7 Injury Collision Record

8 Other Factors to Consider

9 Conclusions and Recommendations

EXECUTIVE SUMMARY

This report assesses the highways, traffic, road safety, and sustainable travel implications of the proposed 'Main Modifications' to the Sheffield Plan regarding site NES36 (Land to the south of the M1 Motorway Junction 35). The site is proposed as a 16-hectare allocation strictly for large-scale logistics and warehousing (Use Class B8), including a recently proposed heavy vehicle refuelling hub.

Following a comprehensive review of available indicative proposals, transport modelling, and prevailing local conditions, this assessment concludes that the allocation presents fundamental, potentially unmitigable risks to both the Strategic Road Network (SRN) and the local highway infrastructure. The current proposals fail to demonstrate how the intense, 24/7 operational demands of a modern logistics hub can be safely absorbed by a network that is already operating over capacity.

Key Findings:

- **Flawed Baseline Data (TRICS):** The developer's reliance on standard, historic TRICS averages fundamentally misrepresents the likely traffic generation of this site. It fails to account for the massive volume of "last-mile" LGV (van) deliveries and smooths over the severe congestion spikes caused by concentrated 24/7 shift changeovers.
- **The Geographic Routing Trap:** The strategic transport modelling overlooks a critical local constraint: M1 Junction 35A is a restricted junction offering no northbound entry or southbound exit. Consequently, the motorway cannot act as a local bypass. This structural limitation guarantees that westbound commercial traffic, heading for Thorncliffe etc., will be forced directly through the residential centre of Chapeltown, overwhelmingly burdening the already failing Warren Lane/Thorncliffe Road junction.
- **Hostility to Active and Sustainable Travel:** Claims of sustainable accessibility are highly misleading. The site is physically severed by steep gradients and a hostile freight environment. The primary public transport link (the M35 bus) operates on an hourly basis with no late-evening or Sunday service, rendering it entirely useless for 24/7 logistics shift workers and guaranteeing absolute car dependency.
- **Severe Road Safety Risks:** Any proposed or modelled reliance on secondary local routes, such as Jumble Lane or Loicher Lane, introduces unacceptable safety hazards. These semi-rural lanes possess narrow carriageways, blind bends, and a complete absence of pedestrian footways, making them fundamentally incapable of safely mixing with high-frequency industrial traffic.
- **Ecological and Air Quality Threats:** Adding heavy logistics traffic to the M1 J35 corridor - a known air quality hotspot - threatens to reverse pollution reduction trends in the S35 postcode, whilst simultaneously degrading the ‘Very High’ ecological value of the adjacent ancient woodlands through increased nitrogen deposition.

Overall Recommendation: On the basis of current information, the allocation of NES36 is not demonstrated to be safe, sustainable, or consistent with national planning policy. Unless a robust, independently audited micro-simulation transport model is provided, accompanied by a fully funded, pre-commencement mitigation package that physically prevents rat-running and solves the Chapeltown routing conflict, the site should be removed from the Sheffield Plan. If the allocation is forced through, strict Grampian-style conditions must be applied to prevent any development until all necessary off-site highway and active travel infrastructure is complete.

3 BACKGROUND

Planning Inspectors have considered the 'Sheffield Plan' (the Plan) proposals under a number of stages of the Planning process including 'Regulation 19' of The Town and Country Planning (Local Planning) (England) Regulations 2012. Regulation 19 focused on four main tests of soundness, namely Positively Prepared: Based on a strategy that seeks to meet objectively assessed development and infrastructure requirements; Justified: Based on proportionate evidence; Effective: Deliverable over the plan period; Consistent with National Policy (such as the National Planning Policy Framework (NPPF). The Inspectors now consider the Plan to be 'sound and legally compliant subject to main modifications being agreed and made'. The Inspectors will essentially seek to determine whether adding a site or sites, such as NES36, makes the plan 'sound' (by meeting employment needs etc), or 'not sound' by creating unmitigable traffic issues. The modifications must still undergo detailed transport assessment, sustainability appraisal, habitats assessment, and public consultation and it can still be argued that the four main tests of soundness have not been satisfied because the proposed Main Modifications fail to resolve the infrastructure and highway safety issues identified during the examination.

The proposals still lack detail on, for example, precise details of site use (see below under TRICS), which makes it difficult for Inspectors to make a final decision, and for consultees to offer fully considered responses. Neither is there sufficient mention, or demonstrable evidence, of the possible cumulative effect of the addition of the proposed greenbelt sites to the many other committed and ongoing developments in and around Ecclesfield, Grenoside and Chapeltown, for example those in Oughtibridge, Deepcar, Thorpe Hesley, Hoyland and other nearby settlements. Several are either committed or already in construction in and around Ecclesfield, Chapeltown and Oughtibridge alone. It does not seem that the overall traffic impacts of these developments have been sufficiently considered in the individual site assessments for the Sheffield Plan, or as a whole.

Whilst it must be accepted that building on some Greenbelt land might offer more variety and choice of homes, and local employment opportunities, this should only be considered over Brownfield/urban development where it can be achieved without significant impact at the proposed site and in the wider area. More detail needs to be provided on, and more consideration given to, the impact on the existing local road network and how any proposals taken forward could be mitigated to eliminate or sufficiently reduce adverse effects. Should it not be possible to reduce adverse impacts to acceptable levels, these sites should be withdrawn and alternatives sought.

Because the sites are greenbelt sites the Inspectors require proposals to meet the 'Golden Rules' of the National Planning Policy Framework (NPPF). The Golden Rules state that for greenbelt release, sites must deliver 50% affordable housing, the upfront provision of necessary local infrastructure and the creation of enhanced, publicly accessible green spaces. This means that the developer must prove that they can mitigate the impact on strategic and local roads and provide the required improvement measures, preferably pre-commencement rather than pre-occupation to avoid construction traffic adding to the existing traffic problems. For the area in question this is likely to comprise a combination of strategic Motorway interventions (M1 junction 35) and localised infrastructure upgrades on Cowley Hill/Cowley Way. Active sustainable travel improvements would be required to meet current standards.

In the previous review of the proposed Sheffield Plan (July 2025) Aprica assessed site NES36 (known then as site S0141). At that time no access arrangements were available. The earlier assessment is shown below along with the Council's assessment of suitability. Aprica's comments follow and largely still stand other than the collision statistics which have been updated, and the now identified proposed site accesses.

Green Belt site allocation appraisal (Employment)

Site Reference: S04101

Address: Land to the south of the M1 Motorway Junction 35, S35 1QP

Gross site area (Site allocation): 16.37 Hectares

Net housing area: 0.00 Hectares

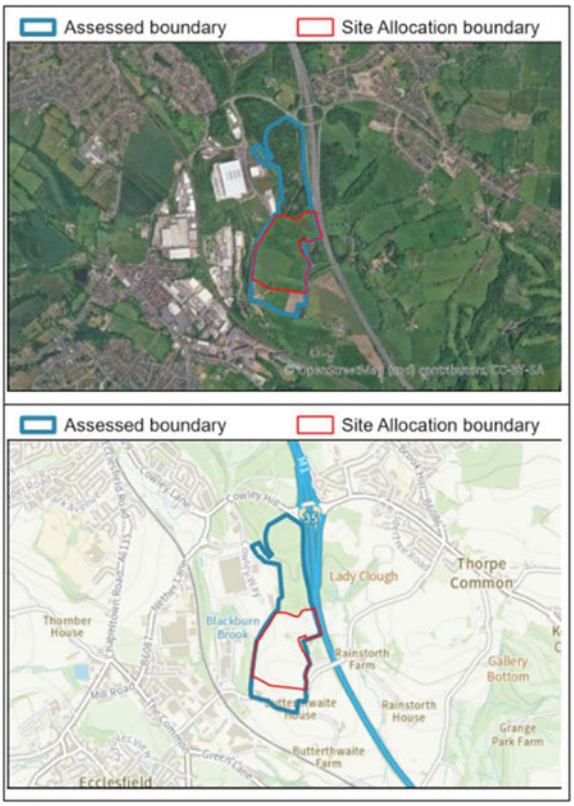
Estimated housing capacity: 0 homes

Net employment area: 15.94 Hectares

Ward: East Ecclesfield Ward

Housing Market Area: Chapeltown & Ecclesfield

Ownership: Private



Distance to core public transport network (CPTN)	NN	Site more than 1200m from the Core Public Transport Network
Access to active travel/cycle network	YY	Site within 400m of an existing or proposed route which is at LTN1/20 standard
Potential to increase the viability of public transport or support investment in new public transport infrastructure	-	Site is beyond 400m of planned bus network improvement or 800m of planned tram/rail network improvement

- Site is within 400m of an active travel/cycle network. Footpaths on site should be retained.

- Whole site is more than 400m from the Core Bus Network (as of December 2023) and more than 800m from a railway station or a tram stop (around 2km to Chapeltown Railway Station).
- Potential capacity issues previously identified at junctions (roundabouts) of Burncross Road/Lound Side and Ecclesfield Road/Cowley Lane in Chapeltown town centre (within 2km). Contributions may be required to local highway improvements identified through the additional transport modelling and/or Infrastructure Delivery Plan.
- Site is within 5km of an M1 junction – Contributions may be required to strategic highways improvements at junctions on the M1..
- Adds further development in a ward where there are already other employment sites.

- Contributions may be required to strategic highways improvements at junctions on the M1 and the local road network.

Aprica comment:

- This site is rated double-negative (NN) for public transport, being over 1200m from the core public transport network
- The double-green (YY) rating for proximity to (within 400m) an active travel network is questionable, as it probably refers to the circular Route 67, more of a leisure loop around High Green, Wentworth, Thorpe Hesley and Parson Cross. Commuter cyclists are unlikely to find this loop beneficial, attractive, or of use to commute
- Bus travel enhancement is unlikely to be viable, with an unrated score (yellow) for proximity to planned improvements. The nearest bus stops are likely to be those on The

Common, which is over 800m away as the crow flies, and for some it would be over 1000m away. It is also across a railway line and, at present, inaccessible

- Capacity issues have been identified at Burncross Road/Lound Side and Ecclesfield Road/Cowley Lane. Contributions to local highway improvements are mentioned and this should be clarified and confirmed should this proposed site be progressed
- ~~There have been two serious injury collisions (three casualties) and six slight injury collisions (nine casualties) on the roads in question, specifically parts of Cowley Hill and Cowley Way, part of Loicher Lane and Jumble Lane, and the M1 offslip (CrashMap 2019-2023)~~
- ~~Access appears to be proposed from Cowley Way but could include Loicher Lane and Jumble Lane. Access suitability would need to be considered further should this proposed site be progressed~~

4 ASSESSMENT OF HIGHWAY PROPOSALS FOR SITE NES36

Surrounding Network

Of significant concern at proposed site NES36 is the proximity to the M1 which is only around 400 metres away. The M1 Junction 35 (known as the Thorpe Hesley junction) is regularly congested, particularly the northbound offslip for traffic exiting toward Cowley Hill and Nether Lane (A629), the Smithy Wood Business Park (Cowley Way) and Thorpe Hesley. There is a bottleneck at the M! roundabout which meets Cowley Hill. During morning peak hours, particularly, traffic exiting the motorway exceeds the capacity of the roundabout, causing vehicles to queue back onto the main M1. Cowley Hill and Nether Lane are heavily used by local traffic and when these roads are slow, the roundabout can't clear.

The offers no practical mitigation for the local network. Because the primary local destinations such as the Thorncliffe corridor sit geographically south of the A616 (J35A), utilising the motorway requires a substantial detour. Commercial sat-nav routing and natural commuter behaviour will always default to the path of least resistance which, in this case, is the more direct route straight through the residential centre of Chapeltown, directly impacting the Warren Lane bottleneck.

The Smithy Wood Business Park/Cowley Way already adds HGV's and LGV's to the mix, thereby further slowing the flow of traffic. It is understood that SCC has recently granted permission for a charging station for electric HGV's and LGV's on the Smithy Wood site. Whilst this is commendable in terms of the environment it could add hundreds of additional slow-moving vehicle movements around this already congested junction. More commercial development is also said to be in the pipeline for the location, which would add even more slow-moving goods vehicles.

There is frequent congestion beyond Cowley Hill and Nether Lane, along the notorious 'rat run' of Cowley Hill/Nether Lane/Mill Lane/Church Street/Town End Road/The Wheel/Wheel Lane. This is a heavily used route between the M1 and Grenoside, Oughtibridge and Bradfield, on which the collision record is particularly poor. Several junctions all the way from the M1 to Grenoside regularly become congested. The Common/Chapeltown Road/Ecclesfield Road also suffers regular congestion and is one of the most notorious bottlenecks in North Sheffield. New homes, supermarkets and other new amenities have in recent years all exacerbated the long-standing traffic problems in and around Ecclesfield, Chapeltown and Grenoside. This is discussed in more detail below.

Many of the proposed sites are geographically well-located for access to the strategic road network (M1/A616/A6135/A629), not least site NES36 for which the proposed access is from Cowley Way, just 400 metres from the M1 slip road at junction 35. The Strategic Route Network (SRN) seems to have been prioritised in the traffic assessments, suggesting that the sites would generate longer distance journeys rather than sustainable travel modes. The local network's traffic and safety has been largely overlooked. The consultation documents provide no confidence that the local highway network would be able to cope with the increase in traffic demand. Neither is there anything to offer confidence that that local and national Policy and objectives, such as active and sustainable travel, could be achieved.

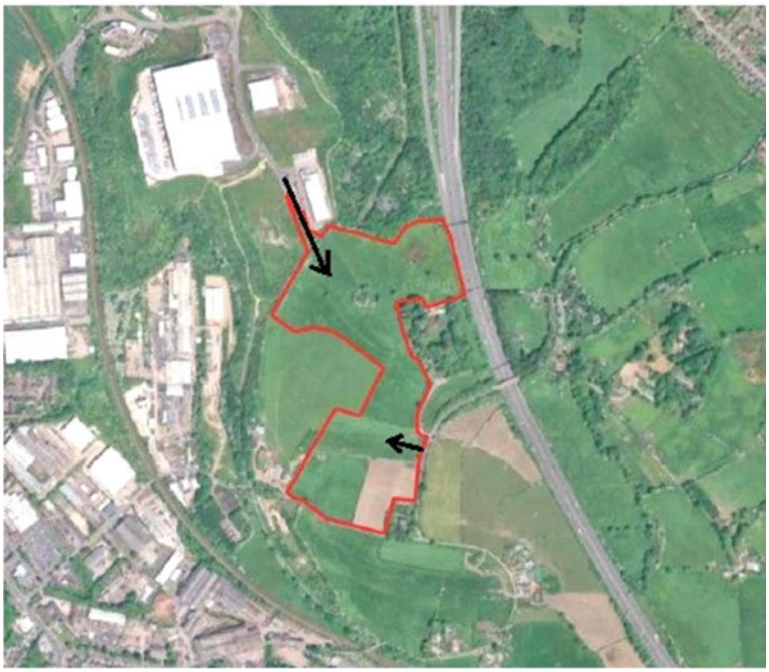
Over the years SCC has carried out several feasibility studies for the area and some traffic management schemes have been introduced. For example High Street/St Michael's Road/Wordsworth Avenue traffic calming and improvements for pedestrians. Other studies have not resulted in any improvement schemes being taken forward. These include the High St/Yew Lane/Stocks Hill/Town End Road/Church Street loop, where narrow streets, parking, visibility, pedestrian safety and parking have long been a serious concern and remain so. This is partly due to the physical inability to introduce measures due to narrow roads, restricted visibility, tight

In addition to local roads being heavily congested at peak periods, the situation is greatly exacerbated by the school run, which is a variable in the localised congestion patterns in this topographically constrained area. The existing traffic associated with Ecclesfield Primary School, located in immediate proximity to the site, creates a concentrated volume of movement which clashes with commuter flows and commercial/HGV traffic utilising the nearby industrial estates.

Proposed Accesses

Access Off Cowley Way

The currently proposed CH04 site access is off Cowley Way, a signalised junction. As mentioned above, the junction is less only 400 metres from the M1. The junction is regularly gridlocked and additional traffic here, including slow moving goods vehicles, would be sure to add to congestion. There is an absence of realistic sustainable travel alternatives to the private car. This is discussed later under Sustainability. Residents are concerned that another access is being suggested from Jumble Lane. Both are shown by the black arrows on the map below.



Smeedon Foreman Site Boundary Plan Annotated to Show Suggested and Possible Accesses

In recent years, National Highways and local Councils have implemented schemes to try and mitigate congestion and M1 tailbacks. Smart Motorway Monitoring has been introduced so that if slip road congestion reaches a certain level, overhead gantries on the M1 trigger speed reductions to manage the flow approaching J35. Improvements such as MOVA (Microprocessor Optimised Vehicle Actuation) have arguably helped to regulate the flow of traffic, but they have not resolved the problems because sheer volumes of traffic ‘saturate’ the junctions. Before any development is approved a full assessment should be carried out to determine what, if anything, can be done to sufficiently mitigate the known traffic problems.

<u>Possible Access Off Jumble Lane</u>

The potential use of Jumble Lane as an access or routing corridor for NES36 presents severe road safety and sustainability conflicts. Jumble Lane has the geometry of a rural route; it is narrow all the way to Thorpe Hesley, has sharp ‘blind’ bends, and no footways. It is fundamentally incapable of safely absorbing high-frequency logistics and commuter traffic. The adjacent Loicher Lane, the route to Ecclesfield, is the same if not worse, as it has a low bridge. The absence of segregated cycle infrastructure with no possibility of introducing any, and no adequate street lighting renders the route hostile to pedestrians and cyclists. Any reliance on Jumble Lane, or Loicher Lane, to satisfy the development's 'active travel' obligations is, therefore, critically flawed as it would force vulnerable road users into direct, dangerous conflict with 24/7 industrial vehicles.



Jumble Lane In The Vicinity Of The Rumoured Access - Google



The Low Bridge On The Narrow Loicher Lane - Google

5 SUSTAINABILITY

For site NES36 the hierarchy of travel modes – 1. Walking, 2. Cycling & wheeling, 3. Public transport, 4. Private car – needs more consideration and more detail provided on how active and sustainable travel can genuinely be achieved, before the site progresses. This is explored in more detail below.

Sustainable Travel Modes

1. Walking: Footways on Cowley Hill and Nether Lane lack connection, are non-existent in many places, and are very unattractive for walking up and down the steep Cowley Hill. It is highly unlikely that anyone would walk to the new site even if multi-million pound highway improvements could physically be introduced.



Cowley Hill Narrow/Non-Existent Footway Example – Google



Cowley Hill Overgrown Footway - Google

2. Cycling: Much as for walking, the roads are steep in places and there are no cycle friendly measures other than a short, worn out and, more importantly, outdated section of shared use cycleway, which is now not permitted under LTN 1/20. Only the most serious cyclists would be likely to cycle to site NES36 and back. The claim that the site is 'within 400 metres of an active travel network' is very misleading as it can only be referring to the circular NCN Route 67, which is a leisure loop around High Green, Wentworth, Thorpe Hesley and Parson Cross. Commuter cyclists are unlikely to find this loop useful.



Approximately 100m of Worn Shared Use Cycle Lane on Cowley Hill - Google

3. Public Transport: Again SCC's site assessment is misleading. Those walking from the new site for the 135, 635 or M35 on Cowley Hill would have a walk of at least 1km either all uphill or up to Cowley Hill then down to Cowley Lane. Whilst the 135 is a half-hourly service, and there are local infrequent services (the 635 and M35), the bus stops are woefully poor. The nearest stop would be the one on Smithy Wood Drive, a walk of at least 600 metres to an infrequent M35 service.

Current requirements for bus stops are for raised bus boarder kerbs, tactile paving for partially sighted users, bus stop clearway markings, and preferably shelters. There are none of these at any of the bus stops in question other than an old damaged shelter on Cowley Lane.

Chapeltown Railway Station is at least a 30 minute walk (over 2km) along a busy unattractive walking route.

4. Private Car: This is highly likely to be the mode of choice for most people accessing the proposed site. It is very close to the Motorway, users could be travelling long distances and at unsociable hours, and other travel modes are poor, unattractive or non-existent.

6 TRIP GENERATION AND TRICS

TRICS is the 'Trip Rate Information Computer System'. It is effectively an industry-standard historical library of traffic figures. When developers want to build something new – such as housing or commercial space – they must demonstrate how much extra traffic the development would put on the highway network. Because the development doesn't yet exist, the developer uses TRICS and its database of like-for-like sample sites to assess and demonstrate what has happened at similar sites in the past.

Whilst TRICS contains thousands of real-world traffic counts from across the UK and Ireland, its outputs are often controversial and have been strongly challenged for site NES36. Developers naturally want to demonstrate the minimum impact on the highway network and might therefore choose a site that is not entirely comparable. The Transport Assessment's (TA's) reliance on

TRICS data fails to provide a credible forecast of the traffic impact from NES36. It is contested that the baseline parameters used appear to rely on traditional ‘B8 storage’ data rather than reflecting the intense 24/7 reality of a modern logistics and a recently approved refuelling hub. By failing to accurately account for the proportion of HGV and LGV movements and masking the severe congestion spikes caused by concentrated 24/7 shift changeovers, the TRICS outputs artificially dilute the perceived impact on the local network. Consequently, any proposed mitigation based on these flawed TRICS averages is inherently inadequate. Critics argue that Planners should design for a typical busy day (called the 85th percentile), whilst Developers prefer to use the average day (the mean) to make the impact look lower. Thus, in real-world terms, actual traffic volumes and impacts are very often significantly worse. Driver and other road user behaviour in ‘the real world’ is not like a computer model in any case. A regular example would be where drivers stop in long lines of slow-moving main road traffic to let single vehicles in or out of minor junctions, thereby impacting on dozens of following main road vehicles.

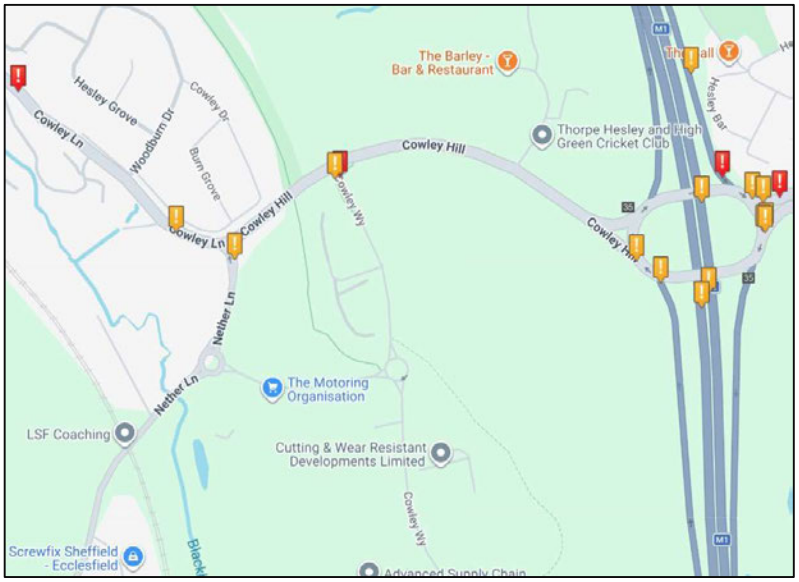
Whilst Aprica does not have the software or expertise to challenge TRICS, and to do so would take many hours, the core issue for Site NES36 is the discrepancy between the theoretical model used by SCC and the physical reality of modern logistics. Skewed TRICS figures can also make sites appear more sustainable than they actually are. Site NES36 is on a steep, semi-rural edge with limited walking and no real cycling facilities, and inconvenient out of date bus facilities. Using dissimilar samples constitutes data error. If traditional 8am to 5pm patterns have been used, again this would skew traffic volumes and modes of travel.

The data should be closely checked to ensure its soundness and if necessary re-run. TRICS is, in any case, just a library of numbers and predicts trip numbers based on existing, similar, sample sites. It cannot model the cumulative impact of development on, say, nearby major junctions. A full micro-simulation model should be built, using software such as VISSIM (“Verkehr In Städten SIMulationsmodell” - which translates to "Traffic in Cities - Simulation Model”) to show actual traffic modelling for the wider area rather than just numbers for a ‘site’.

7 INJURY COLLISION RECORD

‘CrashMap’ is a website that uses official government data (the STATS19 database) collected by police forces across the country, to allow users to see where, when, and (for a fee) how road traffic collisions (RTC’s) are occurring in their local area.

According to ‘CrashMap’, for the latest verified five-year period (2020 to 2024 inclusive) there have been two serious (six casualties) and five slight (eight casualties) injury collisions on Cowley Hill and the top of the M1 slip road. Downstream, further along Nether Lane and in & around Ecclesfield and Chapeltown, there have been dozens of recorded injury collisions including a fatality on Nether Lane. Some of these will no doubt be because of the traffic volume and congestion on physically constrained roads.
In terms of the number of injury collisions, it should be noted that although there is little published data on unreported collisions, the Department for Transport (DfT) suggests that ‘*for every reported and recorded injury collision there could be as many as 5 unreported injury collisions and 20 damage-only collisions*’. Near misses could be as many as 300 per recorded injury collision.



Cowley Lane, Cowley Way and Surrounding Area Injury Record – CrashMap

8 OTHER FACTORS TO CONSIDER

The Preliminary Ecological Appraisal (PEA) for 'Smithywood Business Park Phase 2' demonstrates strengths in its approach to highways, traffic, transport, road safety, and sustainable travel by recognising the importance of maintaining and enhancing green infrastructure, such as the Strategic Green Network along Blackburn Brook, and recommends integrating footpaths and cycle routes into the development. It also proposes mitigation measures such as buffer zones, sympathetic lighting, and Sustainable Urban Drainage Systems (SUDS), which can benefit both ecological integrity and road safety. The appraisal has notable limitations, however, that should be addressed. There is little assessment of how increased vehicle movements or changes to road layouts might affect pedestrian and cyclist safety, nor does it evaluate the capacity of existing transport infrastructure. Whilst the report mentions integrating active travel routes, it does not specify how these will connect to wider networks or address barriers such as the M1 motorway. Furthermore, the potential for increased traffic to cause indirect ecological impacts - such as air pollution, noise, or roadkill - is not explored. The appraisal also misses opportunities to promote a modal shift away from car dependency or to set measurable targets for sustainable travel and road safety improvements.

The Statement of Common Ground (SOGC) between SCC and St Paul's/Smithywood Business Parks Developments ltd causes concerns about traffic, road safety, and the lack of commitment to sustainable travel. The current plans admit that the development will increase vehicle trips and may require improvements at already busy junctions, but these vital decisions are being postponed until after planning permission is granted. This approach risks worsening congestion and road safety for local residents, with no guarantees that necessary upgrades will be delivered in time or at all. There is no clear agreed plan for safe walking, cycling/wheeling, or public transport access to the site. The SOGC only confirms that these issues will be looked at later, rather than making them a priority from the start. Without firm commitments to sustainable and active travel, this development could lock in more car dependency and undermine efforts to create a healthier, safer community. Planners should demand clear, up-front solutions for traffic, road safety, and sustainable transport before allowing this development to proceed.

The Sheffield Plan Proposed Additional Site Allocations document for NES36 specifies that contributions may be required to strategic highways improvements at M1 junctions and the local road network, but it does not detail the scale or nature of these improvements. There is a general requirement for a comprehensive environmental assessment and for offsetting adverse impacts

through compensatory improvements to the Green Belt, but explicit mitigation measures for transport or road safety are not set out at this stage. More broadly, the Plan relies on updated infrastructure and transport assessments, which suggest that existing mitigation schemes are generally sufficient for the additional sites, though some further upgrades may be needed at specific junctions. However, the document defers most site-specific sustainable travel and road safety measures to later planning stages, such as masterplanning and planning applications. This approach means that while the need for infrastructure improvements is acknowledged, there is a lack of detailed, up-front commitments to sustainable travel options (such as walking, cycling/wheeling or public transport or cycling enhancements) and road safety interventions for NES36. This could present risks in terms of ensuring that new developments are well-integrated with sustainable transport networks and do not exacerbate existing road safety or congestion issues.

A local campaign group submission on Main Modification MM350 (NES36) argues that the allocation remains unsound because the site boundary changed materially during examination (following removal of land not in the landowner's control) without any corresponding update to the evidence base or re-comparison with alternatives. It contends that key constraints, including transport, air quality, noise, landscape etc, are being inappropriately deferred to the planning application stage, undermining deliverability and effectiveness. It also claims cumulative impacts (including from a recently approved HGV refuelling hub) have not been assessed and that realistic buffering significantly reduces the developable area, leading to an overstatement of site capacity; the group therefore concludes NES36 should be removed from the plan. This is in line with Aprica's assessment and view.

Campaigners have also formally objected to the refuelling hub, stating that it duplicates existing/approved motorway service provision while also causing material planning harm including highway safety/congestion and extra air/noise/light pollution.

Other local objectors have confirmed the above views, by formally arguing to Planners/SCC that the proposed NES36 development risks causing traffic congestion and environmental harm because key road safety and infrastructure impacts have not been properly assessed. The lack of technical studies on access and layout is raised, warning that increased traffic could damage nearby woodlands and does not safeguard sustainable movement and protection of the community.

In the 2025 Air Quality Annual Status Report (ASR) the area around the M1 Junction J35 remains a hotspot of concern. Air quality at the location heavily dictated by motorway congestion. When the M1 backs up, air quality on Cowley Hill becomes significantly worse. Adding the new commercial development at site NES36 would introduce a significant risk of reversing the downward trend in pollution for the S35 postcode.

9 CONCLUSIONS AND RECOMMENDATIONS

Conclusions

The information currently available does not demonstrate that the proposed access arrangements for site NES36 would be safe, operationally effective, or capable of supporting the proposed logistics/warehousing use without unacceptable impacts on the Strategic Road Network (M1 Junction 35) and the already failing local network. The site's immediate proximity to a junction that is already prone to severe congestion, combined with the continuous, 24/7 nature of modern HGV and LGV movements, creates an unmitigable risk of exacerbating local gridlock. Furthermore, realistic scope for inclusive active travel and public transport access is virtually non-existent due to severance, steep gradients, and hostile freight environments.

In relation to the Regulation 19 'tests of soundness', the following conclusions are drawn for site NES36:

- **Positively Prepared:** The proposals do not meet objectively assessed infrastructure requirements. The indicative material prioritises strategic motorway assumptions while offering zero assurance that the already constrained local road network - specifically the well-documented bottlenecks at Cowley Hill, Cowley Way, the Warren Lane/Thorncliffe Road junction, and indeed in Ecclesfield itself, can accommodate the development. Furthermore, the consultation material lacks a funded, pre-commencement mitigation package.
- **Justified:** The allocation is not supported by proportionate or transparent evidence. The developer's reliance on standard TRICS averages is fundamentally flawed; it relies on traditional 'B8 storage' data that fails to reflect the hyper-intensive, 24/7 reality of a modern logistics and refuelling hub, severely underestimating "last-mile" LGV (van) movements and shift-change traffic spikes. Furthermore, the assessments ignore the geographic reality that M1 Junction 35A is a restricted junction. Because it offers no northbound entry or southbound exit, it cannot function as a local bypass, guaranteeing that westbound commercial traffic will be structurally forced through the residential centre of Chapeltown.
- **Effective:** Deliverability over the plan period is not demonstrated. Deferring key access design and capacity mitigation to the planning application stage creates an unacceptable risk. Furthermore, any reliance on Jumble Lane or Loicher Lane for secondary, emergency, or active travel access is critically unsafe. These routes possess semi-rural geometry, blind bends, and lack continuous footways, rendering them fundamentally incapable of safely absorbing high-frequency logistics or commuter traffic.
- **Consistent with National Policy:** Consistency with national sustainability policies is not demonstrated. Claims regarding public transport accessibility are entirely unrealistic. The primary local bus route (the M35) operates on a limited hourly frequency with no Sunday or late-evening service, making it completely incompatible with the 24/7 shift patterns of a logistics hub. Consequently, the site guarantees heavy reliance on private car usage, directly conflicting with national policies on sustainable transport and air quality improvement, particularly given the existing pollution concerns at the M1 J35 hotspot.

Recommendations

- **Reconsideration and Removal:** The allocation of site NES36 should be seriously reconsidered. Unless safe access, accurate network impact modelling, and genuine sustainable travel deliverability can be proven prior to adoption, the site must be removed from the Sheffield Plan due to unresolved highway safety hazards and severe residual network impacts.

- **Grampian-Style Conditions:** If the allocation is progressed against these objections, strict Grampian-style conditions (or equivalent plan policy wording) must prevent commencement until the following are agreed, fully funded, and completed:
    - Detailed access designs independently audited for heavy HGV/LGV demand
    - A defined package of strategic mitigation at M1 J35 (agreed with National Highways) and local junctions
    - Physical, engineered measures that actively prevent commercial rat-running through constrained residential areas and strictly prohibit commercial routing via Jumble Lane or Loicher Lane.

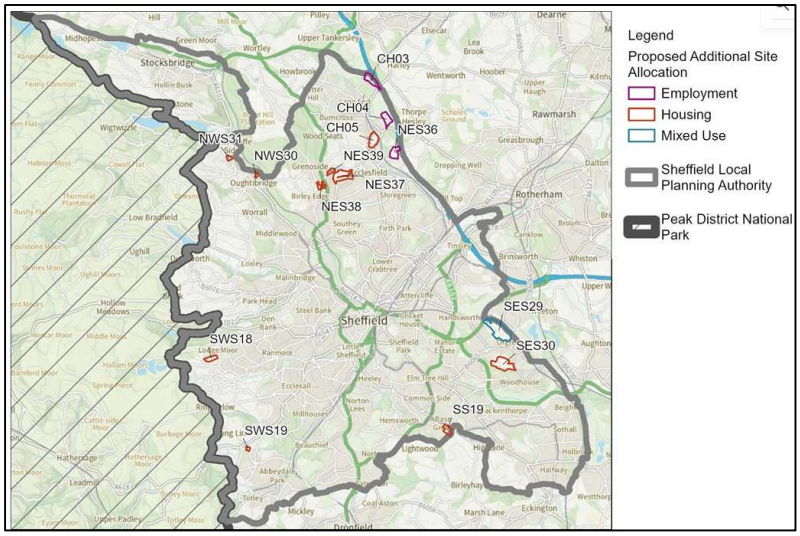
- **Mandatory Sustainability Strategy:** A robust Sustainability Strategy must be tested for deliverability at the allocation stage, not deferred. It must explicitly address how the site will secure 24/7 public transport provision that aligns with shift patterns (beyond the inadequate M35 service) and demonstrate how LTN 1/20 compliant cycling provision can physically be achieved within existing, constrained highway limits. Where these are undeliverable, the scale of the development must be permanently reduced or refused.

- **Robust Transport Re-assessment:** A comprehensive micro-simulation model (e.g., VISSIM) must be mandated to capture the true cumulative impact of NES36 alongside all other committed S35 developments. This assessment must abandon generic TRICS averages in favour of 'busy day' (85th percentile) sensitivity testing that accurately accounts for modern e-commerce LGV volumes, strict shift changeover spikes, and the routing restrictions imposed by M1 Junction 35A.

“The Sheffield Plan”

Review of Proposed Accesses to Site NES37
‘Land between Creswick Avenue and Yew Lane, S35 8QN’

(also previously referred to by Sheffield City Council as Site S03038)



Map of Sites – SCC



Proposed Site Accesses – Carter Jonas/Enjoy Design ltd

April 2026

1 TERMS OF REFERENCE

Aprica ltd has been commissioned by a local interest group to comment on the highway implications for the proposed access arrangements for Site NES37 (also previously called sites S03051 & SO3034 combined, by Sheffield City Council) 'Land between Creswick Avenue and Yew Lane, S35 8QN', hereafter referred to as 'NES37', one of the sites identified in the proposed 'Sheffield Plan' ('the Plan') Consultation Documents.

The purpose of this report to is assess the transport and traffic implications of the current proposal. It is intended that this report be considered by the interest group with a view to submitting a formal response to Sheffield City Council ('SCC'). The report is based on local knowledge, prevailing highway conditions and available documents, illustrative drawings etc.

Ian Taylor (I.Eng MICE) has produced this report. Ian is an Incorporated Engineer and a Member of the Institution of Civil Engineers, with thirty-five years' experience of public and private sector highway infrastructure disciplines including transportation planning, RoSPA accredited accident investigation & prevention, traffic management, road safety audits, traffic regulations, and highway design & construction. Ian has led on numerous major highway projects for Local Authorities and has presented at Planning Committees, Council meetings, public meetings and drop-in events, and at Public Inquiry.

2 INTRODUCTION

The scope of this report is to consider the proposed 'Main Modifications' for the Sheffield Plan (the Plan), for site NES37, a site of 17.41 hectares, proposed for the construction of around 600 dwellings, education use and a multi-faith burial ground. The intention is to offer expert comments on the site's safe and practical useability by the travelling public, and the impact on the highway network.

For ease of reference this report is separated into the following parts:

1 Terms of Reference

2 Introduction and Executive Summary

3 Background

4 Assessment of Highway Proposals

5 Sustainability

6 Injury Collision Record

7 Other Factors to Consider

8 Conclusions and Recommendations

EXECUTIVE SUMMARY

This Statement summarises the main highways, traffic, road safety and sustainable travel issues arising from the indicative proposals for Sheffield Plan site NES37 (Land between Creswick Avenue and Yew Lane, S35 8QN), identified for around 600 dwellings, education use (including SEND provision) and a multi-faith burial ground. It highlights key risks, evidence gaps and actions required before the allocation, or any later planning application, can be considered acceptable.

The surrounding network (Wheel Lane/The Wheel/Town End Road, Yew Lane, Creswick Lane, Creswick Avenue) is already constrained by narrow widths, limited visibility, on-street parking, topography and peak-time congestion (including school-run effects).

Key findings:

- **Safety/access geometry:** The Wheel access (as drawn) is close to a sharp bend with restricted visibility, narrow carriageway/footway and pedestrian pinch points; a safe design for all users must be demonstrated.
- **Capacity/congestion:** Local links and junctions are frequently overloaded at peak times; housing, education and burial-related trips would add to delays unless substantial, deliverable mitigation is evidenced.
- **Rat-running and residential amenity:** Multiple access points could enable through-traffic and change the function/character of residential streets (including Creswick Avenue) unless physically prevented by design.
- **Sustainable travel deliverability:** Sub-standard/narrow footways, 'severance' and steep gradients constrain inclusive walking/wheeling; it is unclear how LTN 1/20 quality cycling and wider off-site links could be delivered within existing highway limits.
- **Evidence gap:** Current material is indicative and does not yet provide robust trip generation (including school "peak within a peak"), cumulative impacts, or a defined mitigation package.
- Acceptability depends on meeting the Plan's "Golden Rules" / Main Modifications and the Regulation 19 soundness tests such as safe access, mitigated traffic impact and deliverable sustainable connections consistent with national policy.

Recommendations & Requirements:

- A single, masterplanned access and movement strategy (including rat-run prevention) before reliance can be placed on indicative sketches.
- Robust transport evidence in the form of transparent trip assumptions (including education and burial), and cumulative assessment with committed growth using micro-simulation where proportionate.
- An 'Active Travel England'-ready package showing deliverable, inclusive off-site walking & wheeling links, and LTN 1/20-quality cycling connections. If not deliverable, acknowledge the constraints.

On current information, NES37 risks car dependency and worsening congestion/safety unless major, deliverable mitigation is secured and evidenced in advance. If deliverable mitigation cannot be evidenced, reconsider the allocation. If the development is progressed, apply Grampian-style restrictions preventing commencement until all off-site works are complete.

3 BACKGROUND

Planning Inspectors have considered the 'Sheffield Plan' (the Plan) proposals under a number of stages of the Planning process. This stage is 'Regulation 19' of The Town and Country Planning (Local Planning) (England) Regulations 2012. Regulation 19 focuses on four main tests, the previous comments and objections etc already having been considered in what is effectively the Planners' agreed shortlist of sites with potential but requiring further assessment and consideration. The Inspectors are unlikely to consider previous comments, since they have already considered them in shortlisting, and will now consider the four tests, namely that the Plan must be: **Positively Prepared:** Based on a strategy that seeks to meet objectively assessed development and infrastructure requirements; **Justified:** Based on proportionate evidence; **Effective:** Deliverable over the plan period; **Consistent with National Policy** (such as the National Planning Policy Framework (NPPF).

The Inspectors consider the Plan to be 'sound and legally compliant subject to some modifications being agreed and made'. The modifications must undergo sustainability appraisal, habitats assessment, and public consultation. The Inspectors will essentially seek to determine whether adding sites, such as CH05, makes the plan 'more sound' (by meeting employment needs etc), or 'unsound' by creating unmitigable traffic issues.

The proposals still lack detail on, for example, precise numbers and layout of houses and acceptable likely trip data (see below under TRICS), which makes it difficult for Inspectors to make a final decision, and for consultees to offer fully considered responses. Neither is there sufficient mention, or demonstrable evidence, of the possible cumulative effect of the addition of the proposed greenfield sites to the many other committed and ongoing developments in and around Ecclesfield, Grenoside and Chapeltown, for example those in Oughtibridge, Deepcar, Thorpe Hesley, Hoyland and other nearby settlements. Several are either committed or already in construction in and around Ecclesfield, Chapeltown and Oughtibridge alone. It does not seem that the overall traffic impacts of these developments have been sufficiently considered in the individual site assessments for the Sheffield Plan, or as a whole.

Whilst it must be accepted that building on some Greenbelt land might offer more variety and choice of homes, and local employment opportunities, this should only be considered over Brownfield/urban development where it can be achieved without significant impact at the proposed site and in the wider area. More detail needs to be provided on, and more consideration given to, the impact on the existing local road network and how any proposals taken forward could be mitigated to eliminate or sufficiently reduce adverse effects. Should it not be possible to reduce adverse impacts to acceptable levels, these sites should be withdrawn and alternatives sought.

In the previous review of the proposed Sheffield Plan (July 2025) Aprica assessed site NES37 (known then as S03051 & SO3034 combined). At that time no access arrangements were available. The earlier assessment is shown below along with the Council's assessment of suitability. Aprica's comments follow and largely still stand other than the collision statistics which have been updated, and the now identified proposed site accesses.

Green Belt site allocation appraisal (Housing)

Site Reference: S03051 & S03034 (combined)

Address: Land south of Wheel Lane between Creswick Avenue and Wheel Lane, S35

Gross site area (Site Allocation): 30.34 Hectares

Net housing area: 17.41 Hectares

Estimated housing capacity: 609 homes

Net education use area: Up to 7.00 Hectares

Net multi-faith burial ground use area: Up to 4.00 Hectares

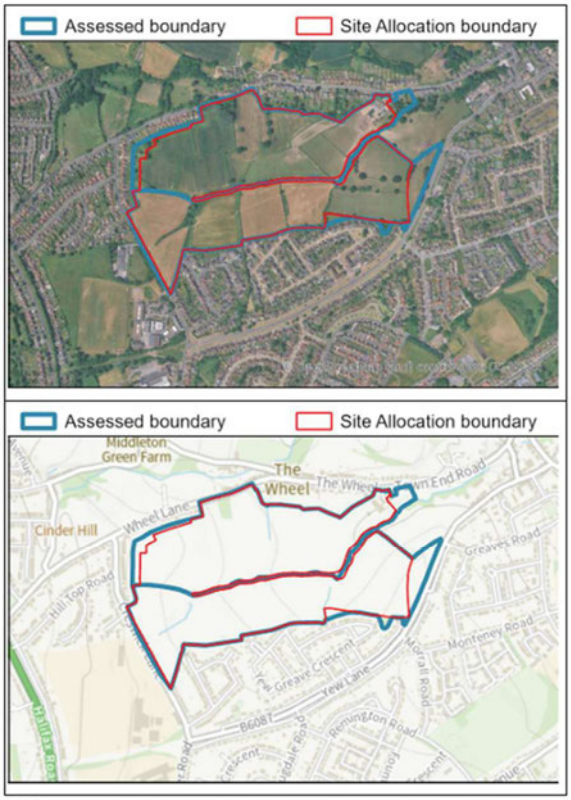
Net employment area: 0.00 Hectares

Ward: East Ecclesfield Ward

Housing Market Area: Chapeltown & Ecclesfield

Ownership: SCC

Note the capacity of these sites in combination is reduced to 609 homes to allow up to 7 hectares of land for a Secondary School (5ha) and SEND School (2ha) and 4 hectares of land for a burial ground.



Page **62** of **332**

Indicator	Indicator score	Indicator score result
Distance to core public transport network (CPTN)	NN	Site more than 1200m from the Core Public Transport Network.
Access to active travel/cycle network	-	Site beyond 400m of an existing or proposed route which is at LTN1/20 standard
Potential to increase the viability of public transport or support investment in new public transport infrastructure	-	Site is beyond 400m of planned bus network improvement or 800m of planned tram/rail network improvement
[illegible]	[illegible]	[illegible]
Availability of local facilities and education capacity	Y	Site within 800m of 4 classes of local facility
	N	No current surplus capacity for either Primary or Secondary education
	YY	No community/leisure/recreation facilities on-site

- Site is within 10-minute walk (800 metres) of a convenience shop and at least 3 other types of community facilities or important local services.
- There is a primary school within 3.2km of the site (although no surplus capacity).
- There is a secondary school within 4.8km of the site (although no surplus capacity).
- There is a primary health care facility within 3.2km of the site.

- Site more than 1200m from the Core Public Transport Network (as of December 2023).
- Site is further than 400m from an active travel/cycle network. Footpaths on site should be retained.
- Potential capacity issues previously identified at the junctions of A6135 Ecclesfield Road / A629 Cowley Lane and Burncross Road / Lound Side in the centre of Chapeltown. Contributions may be required to local highway improvements identified through the additional transport modelling and/or Infrastructure Delivery Plan.
- Site is within 5km of an M1 junction.

- Contributions are required to strategic highways improvements at junctions on the M1 and the local road network.

Aprica comments:

- This site is rated double-negative (NN) for public transport, being over 1200m from the core public transport network
- The site is unrated (yellow) for proximity to an active travel network. The nearest cycle route is Route 67, a circular leisure loop around High Green, Wentworth, Thorpe Hesley/Parson Cross. Commuter cyclists are unlikely to find this loop beneficial, attractive, or of use to commute
- Bus travel enhancement is unlikely to be viable, with an unrated score (yellow) for proximity to planned improvements. In reality the nearest bus stop is the two-hourly Hillsborough to Harley service, not going to or from the city centre. There is no service on a Sunday

- School and healthcare facilities have a negative (N) rating and are too far away for sustainable travel and in any event the schools are full, although there is a commitment to provide sufficient land within the site for a mainstream secondary school and a Special Educational Needs and Disability (SEND)
- The site is rated double-positive (YY) for community/leisure/recreation facilities yet it is stated that there are none. This needs clarification
- ~~There has been one slight injury on the roads in question, specifically on Creswick Lane (CrashMap 2019-2023)~~
- ~~Accesses onto Wheel Lane, Creswick Lane, Creswick Avenue, Yew Lane and Town End Road/The Wheel would need to be considered further should this proposed site be progressed.~~

Because of the concerns raised during the previous hearings, the Inspectors have stated that the final proposals for site NES37 must include 'Golden Rules' main modifications. (now embedded in the Sheffield Plan's own policies following the Inspectors' 2025 findings). The Golden Rules mean that the developer must prove that they can mitigate the impact on local roads. For NES37, this could mean works at the Creswick Lane/Yew Lane Junction and local road widenings. Significant active travel measures are also likely to be required.

4 ASSESSMENT OF HIGHWAY PROPOSALS FOR SITE NES37

Surrounding Network

Over the years SCC has carried out several feasibility studies for the area and some traffic management schemes have been introduced. For example High Street/St Michael's Road/Wordsworth Avenue traffic calming and improvements for pedestrians. Other studies have not resulted in any improvement schemes being taken forward. These include the High St/Yew Lane/Stocks Hill/Town End Road/Church Street loop, and a number of studies for Church St/Town End Road/The Wheel, where narrow streets, parking, visibility, pedestrian safety and parking have long been a serious concern and remain so. This is partly due to the physical inability to introduce measures due to narrow roads, restricted visibility, tight building lines etc).

Several junctions all the way from Grenoside to the M1 regularly become congested. The Common/Chapeltown Road/Ecclesfield Road suffers regular congestion and is one of the most notorious in North Sheffield. New homes, supermarkets and other new amenities have in recent years all exacerbated the long-standing traffic problems in and around Ecclesfield, Grenoside and Chapeltown.

The Wheel, Yew Lane and Creswick Lane are arterial routes between Ecclesfield, Grenoside and wider destinations via the A61 and M1. These junctions are nearly always overloaded during the morning and evening peaks.

In addition to local roads being heavily congested at peak periods, the situation is greatly exacerbated by the school run, which is a variable in the localised congestion patterns in this topographically constrained area. The existing traffic associated with Yewlands Academy (around 900 students), St Thomas More Catholic School (around 200 students), Grenoside Primary School (over 300 students), and the Ecclesfield Primary and Secondary schools (for those with children at different schools), all create a concentrated volume of movement which clashes with commuter

flows. Adding housing, another school and a burial ground would add significantly to the known existing issues.

Proposed Accesses

Vehicular accesses are proposed, indicatively, from The Wheel, Creswick Lane, Creswick Avenue and Yew Lane. Non-vehicular accesses are proposed at a number of other points.



Proposed Site Accesses – – Carter Jonas/Enjoy Design ltd



Vehicle Crossing White Line, At Proposed Wheel Lane Entrance, to Avoid Pedestrian On Narrow Footway – Resident Photo

The proposed Wheel Lane site entrance is just beyond a sharp ‘blind’ bend where the carriageway is narrow and three is only one, very narrow footway. Residents have reported a number of vehicle to vehicle collisions and many near misses when vehicles emerging from the track (proposed to be the site entrance) have conflicted with vehicles rounding the bend and drivers unable to see each other.

Local residents have stated to the Planning Inspectors that they often face long waits just to get from their driveways onto Wheel Lane. This can occur at any time of day but at ‘school run’ times the local roads can become a no-go zone. Roads are very narrow in places and arguably, as former local rural lanes now carrying thousands of vehicles, unsuitable for even more traffic. Parking on-street is commonplace and drivers often obstruct footways by parking partially on them. Creswick Avenue is a residential road (terminating in a cul-de-sac head) but under the proposals would become a primary access and through-route to and from the development, changing the whole character of the road. Other residential backwaters, such as Coppin Square, would be very adversely affected.



Parking on The Wheel – Google



Parking on Yew Lane - Google

Without careful internal planning and physical measures, internal roads at the development could become rat-runs for drivers wishing to avoid the frequent queues on surrounding roads. Under the current proposals drivers could easily avoid the heavily congested Wheel Lane/A61 Penistone Road

traffic signals. Further assessment of the indicative accesses should be made to see if there are more suitable accesses in terms of safety, avoidance of rat runs, reduction or removal of impact on residents, rights of way and the environment. Detailed designs will need to be drawn up and assessed.

5 SUSTAINABILITY

In the UK, standards for sustainable travel and the hierarchy of travel modes are set by the Department for Transport's (DfT's) Manual for Streets (MfS) and Local Transport Note 1/20 (LTN 1/20). The DfT publishes the National Planning Policy Framework (NPPF). Paragraph 114 explicitly states that applications should "give priority first to pedestrian and cycle movements." The MfS is the go-to guide for urban design. It established the hierarchy that places pedestrians at the top and private cars at the bottom.

Active Travel England (ATE) is the government's Sustainable Travel Inspectorate. It reviews large planning applications (such as NES37) to ensure that they meet these standards. If a site is likely to be too 'car-dependent' ATE can formally object. ATE state that for sites such as NES37 active travel infrastructure must go beyond the immediate vicinity of the site. They look at the 'last mile' (i.e. journeys of a mile to and from the site) and expect high quality, inclusive corridors that utilise segregated paths to ensure that walking and cycling will be a mode of choice for accessing local services. ATE has emphasised that site NES37 must overcome its topographical challenges in order to avoid car dependency. ATE's recommendations will be for LTN 1/20-compliant infrastructure serving the wider walking and cycling area. ATE has highlighted that current pedestrian provision on Wheel Lane is insufficient for the projected increase in footfall. ATE mandates segregated active travel links and not simple carriageway/footway widening. In order for active and sustainable travel to be attractive it must be considered, by users, to be safe and of sufficient quality.

The South Yorkshire Mayoral Combined Authority (SYMCA) has been mandated by the DfT that all local transport authorities are required to review and update their statutory Local Transport Plans (LTP's) to align with current national and local priorities, and to provide a more consistent basis for determining future investment priorities. 'Connecting Sheffield' is part of the long-term vision for the future of travel in the city of Sheffield, creating high-quality, convenient and safer routes into and around the city for cycling, walking and public transport. Funding has been made available, from central Government and other sources, to deliver work that aims to transform the city and enable people to make better travel choices. The website https://haveyoursay.sheffield.gov.uk/connecting-sheffield gives updates on projects. At present there are none in the vicinity of site NES37 or north Sheffield in general, but hopefully a case will be made for at least some studies in the area.

It is well worth noting that, according to the 2022 Census, 25% of the population of Chapeltown and Ecclesfield (East Ecclesfield Ward) are over 65 so unlikely to cycle or walk significant distances, and unlikely to use the bus services which are poor. 20% are under the age of 19 and so the majority are of 'working age' and, with the area having one of the highest unemployment rates in Sheffield, will be travelling to work by car. As the Census data is from 2022 and the National trend is towards a population of ageing people, it is likely that the non-walking/cycling community has increased.
For site NES37 the hierarchy of travel modes – 1. Walking, 2. Cycling & wheeling, 3. Public transport, 4. Private car – needs more consideration and more detail provided on how active and sustainable travel can genuinely be achieved, before the site progresses. This is explored in more detail below.

Sustainable Travel Modes

1. Walking: Around site NES37, pedestrian facilities are severely restricted. Wheel Lane and The Wheel have sub-standard footway widths (less than 1 metre wide in places) and obstructions such as house and garden walls which prevent adherence to LTN 1/20 accessibility standards. Residents report that drivers in cars and vans travelling at inappropriate speeds down Wheel Lane where it becomes The Wheel, and where The Wheel becomes Townend, have caused minor (unrecorded) injuries where pedestrians, including children, have been 'clipped' by wing mirrors hitting their heads, arms and hands. Similar issues have been witnessed on Creswick Avenue, where vehicle/child pedestrian collisions have occurred at school opening and closing times. The area also has a challenging topography, with gradients often exceeding the 1 in 20 threshold for inclusive mobility. The current lack of controlled crossing points, for example at the Yew Lane/Creswick Lane junction and the severance caused by the A61, create a high-risk environment for vulnerable road users. Without a comprehensive program of off-site 'walking and wheeling' infrastructure, the site remains isolated from community core areas. It seems unlikely, due to the constricted highway boundaries and the gradients, that ATE's requirements for pedestrians can be met.



Town End Road Footways Narrow and Obstructed - Google

2. Cycling: Much as for walking, the roads are steep in places and there are no cycle measures whatsoever. Only the most serious cyclists would be likely to cycle to site NES37 and back. It seems a physical impossibility to meet ATE's requirements for fully segregated cycle infrastructure.

3. Public Transport: Bus services are not infrequent but reliability is frequently adversely affected by congestion and bottlenecks. Most bus stops are simple bus stop 'flags'. Current requirements are raised bus boarder kerbs, tactile paving for partially sighted users, bus stop clearway markings, and preferably shelters. It is difficult to imagine how all this could be accommodated, along with ATE's requirement for at least 2 metres of clear footway, bearing in mind the constricted highway widths in the area.



Outdated Bus Stops on The Wheel - Google

At over 4km away, Chapeltown Railway Station is beyond viable pedestrian reach and unlikely to appeal to all but the most committed cyclists. This leaves just bus travel on the sustainable travel 'list'. In order to be viable a 'feeder' bus service would be needed, with reliable and consistent (15 minutes or less) timetabling. This is unlikely to happen, other than under short-term Travel Plan incentives, leaving just the car for travel to and from a railway station..

4. Private Car: Since sustainable travel modes are currently poor and unlikely to be made sufficiently attractive, the car is highly likely to be the main mode of transport for people living in or visiting the houses, school or burial ground on the proposed site.

Trip Generation and TRICS

TRICS is 'Trip Rate Information Computer System'. It is effectively an industry-standard historical library of traffic figures. When developers want to build something new – such as housing or commercial space – they must demonstrate how much extra traffic the development will put on the highway network. Because the development doesn't yet exist the developer uses TRICS and its database to assess and demonstrate what has happened at similar sites in the past.

Whilst TRICS contains thousands of real-world traffic counts from across the UK and Ireland, its outputs are often controversial and site NES37 is no exception. The traffic impact assessments TIA's) for site NES37 have been challenged on the grounds of TRICS data suitability, specifically regarding the selection of locational proxies. Critics allege that the standard trip rates applied do not account for Grenoside's severe topographical gradients and that the TRICS methodology fails to identify the 'peak within a peak' demand generated by the co-location of housing and education facilities. In addition it has been suggested that there are no combined housing/burial ground sites in the TRICS 'library'. All of this leads to the potential underestimation of traffic figures and potential over-estimation of sustainable travel take up. Developers naturally want to demonstrate the minimum impact on the highway network and might naturally cherry pick test sites. Critics argue that Planners should design for a typical busy day (called the 85th percentile), whilst Developers prefer to use the average day (the mean) which makes the impact look smaller. Thus, in real-world terms actual traffic volumes and impacts are very often significantly worse than those predicted by TRICS. Driver and

other road user behaviour in ‘the real world’ is not like a computer model in any case. A common example would be where drivers stop in long lines of slow-moving main road traffic to let single vehicles in or out of minor junctions or driveways, thereby impacting on dozens of following main road vehicles.

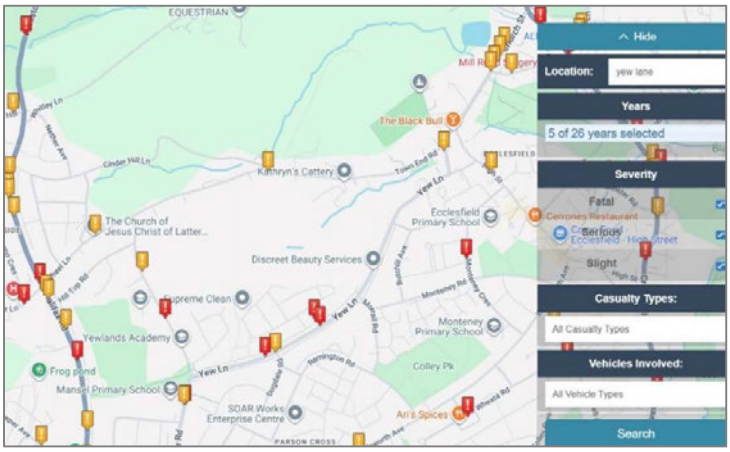
Aprica does not have the software or expertise to challenge TRICS (Trip Rate Information Computer System) and to do so would take many hours. It is therefore beyond the remit of this report but the core issue for Site NES37 seems to be the discrepancy between the theoretical models used by SCC and the likely reality of trip generation and modal transport choice.

The data should be closely checked to ensure its soundness and, if necessary, re-run using data appropriate for busy congested roads with nearby schools and a possible burial ground, such as those around site NES37. As mentioned above, experience has shown that in practice actual trip numbers (especially for private vehicles) are very often higher than those suggested in Transport Assessments (TA’s). Software can easily be used to manipulate and ‘adjust’ modelled outcomes, whereas in real-world circumstances, people’s behaviour and choices dictate what actually happens.

TRICS is, in any case, just a library of numbers and predicts trip numbers based on existing, similar, sample sites. It cannot model the cumulative impact of development on, say, nearby major junctions. A full micro-simulation model should be built, using software such as VISSIM (“Verkehr In Städten SIMulationsmodell” - which translates to "Traffic in Cities - Simulation Model”) to show actual traffic modelling for the wider area rather than just numbers for a ‘site’.

6 INJURY COLLISION RECORD

‘CrashMap’ is a website that uses official government data (the STATS19 database) collected by police forces across the country, to allow users to see where, when, and (for a fee) how road traffic collisions (RTC’s) are occurring in their local area. The CrashMap data for the latest verified five-year period (2020 to 2024 inclusive) is shown below. There have been several slight (shown amber) and serious (shown red) injuries in the area of the site and on surrounding roads. In terms of the number of injury collisions, it should be noted that although there is little published data on unreported collisions, the Department for Transport (DfT) suggests that ‘*for every reported and recorded injury collision there could be as many as 5 unreported injury collisions and 20 damage-only collisions*’. Near misses could be as many as 300 per recorded injury collision.



Injury Collisions - CrashMap

7 OTHER FACTORS TO CONSIDER

The Statement of Common Ground (SOCG) between SCC as Landowner and SCC as Planning (prepared by Carter Jonas) confirms that the site is considered suitable and deliverable for the proposed uses. Should the site progress, however, further investigations and surveys will be needed, encompassing detailed access designs, more detailed trip generation data and mitigation of traffic and road safety issues. The planning process will require compliance with national and local policies on highways, traffic, and road safety for pedestrians, cyclists and other users, and in terms of connected sustainable travel.

At a Sheffield Plan Examination Hearing in October 2025 the Inspector discussed how the site would be accessed and connected, considering the presence of an internal watercourse and a Local Wildlife Site. There was also consideration of the scheme's impact on both the strategic and local road network and whether the site would lead to coalescence of communities.

The National Planning Policy Framework (NPPF) and SCC' own Policies resist the coalescence of settlements and Greenbelt land is scored in terms of importance against such sprawl. Residents argue that developing the site would cause coalescence, merging Grenoside into Ecclesfield and Parson Cross.

The Sheffield Plan Proposed Additional Site Allocations document for NES37 states that *'the allocation requires that highways, traffic, and safety are carefully addressed through a comprehensive masterplan. Development must ensure integration with surrounding areas, retain existing public and permissive footpaths for pedestrian safety, and collaborate with adjacent sites (such as NES39) on a unified infrastructure delivery plan. Access routes should be planned to avoid congestion and maintain safe movement for all users, while a 10-metre buffer is required alongside the adjacent Local Wildlife Site to protect environmental and pedestrian safety. Flood risk mitigation, visual impact, and landscape integration must also be considered to support safe and efficient site access'.* This is likely to mean further, more detailed analysis of the highway infrastructure, and agreed designs to mitigate traffic and road safety issues, should the site be progressed.

The site is currently accessed via a network of Public Rights of Way (PRoW) connecting the surrounding suburbs, with additional access tracks used for agricultural and equestrian purposes. The 'Preliminary Ecological Appraisal' (PEA) notes that '*any future residential development would potentially increase local traffic resulting in the loss and fragmentation of habitats'*. Overall, whilst detailed traffic and highways assessments are not included in the PEA, it does emphasise the need for careful planning and mitigation to address road safety, access, and ecological connectivity in any future development proposals.

Air Quality

Site NES37 is situated within the city-wide Sheffield Air Quality Management Area (AQMA), necessitating a comprehensive Air Quality Assessment to address the impact of the estimated 2,000 additional daily vehicle movements. Under current planning policy, the introduction of sensitive receptors, such as the Secondary and SEND educational facilities, within an AQMA requires robust mitigation to ensure compliance with national nitrogen dioxide (NO2) and particulate matter (PM10) limits. Proposed interventions could include EV charging and 'green' buffer zones. The cumulative impact, however, of this development and other proposed site allocations remains a point of contention. The area's topography could also exacerbate local concentrations of pollutants during

peak 'school run' periods. If suitable measures cannot be guaranteed to work, the site should be withdrawn.

8 CONCLUSIONS AND RECOMMENDATIONS

Conclusions

More evidence needs to be provided, bearing in mind the known issues around site NES37, that the proposed accesses would be safe, connective without leading to rat running, and conducive to sustainable travel. Further development at this location would currently seem inappropriate, based on the known congestion problems. Proposals would need to be compliant with National Planning Policy and are probably not physically deliverable given the available highway widths etc.

Of the 'Four Points' mentioned in Section 3 above, the Inspectors should note the following:

Positively Prepared: The proposals do not currently meet 'objectively assessed development' or 'infrastructure requirements':

- The assessments to date appear to have been rushed in effort to meet SCC's time constraints and seem optimistically in favour of the proposed development, giving little thought to wider and cumulative impact.
- The consultation documents provide no confidence that the local highway network would be able to cope with the increase in traffic demand. Neither is there anything to offer confidence that that local and national policy and objectives, such as active and sustainable travel, could be achieved.

Justified: The proposals are not based on proportionate evidence:

- The allocation of site NES37 is not currently supported by proportionate or complete transport evidence. The cumulative impact of this and major neighbouring developments, in an already badly congested area, is concerning.
- TRICS data is questionable and it is possible that the site could generate significantly higher traffic movements, particularly by private car. If TRICS outputs are not based on like-for-like sites the projected sustainable travel figures are likely to be far too optimistic.

Effective: Deliverable over the plan period:

- The site cannot be made safe and sound without major external highway works and even then would be likely to still present additional hazards for vulnerable road users (i.e. those walking, wheeling and cycling), and are unlikely to sufficiently address congestion. It is therefore unlikely that acceptable proposals, in terms of Policy etc, could be delivered within an agreed period, if at all.

Consistent with National Policy: The proposals are not consistent with Policy such as the NPPF.

- The proposals do not offer enough sustainable transport improvements in an area where they are inadequate at present. The topography and constrained widths do not lend themselves to introducing such measures.
- The proposals would have an unacceptable impact on traffic and road safety for the local highway network and its residents.
- In terms of sustainability, walking to and from the site is unlikely due to the unattractive footways and significant traffic volumes passing close to those walking. Footways are narrow

or non-existent in places. There is no cycle infrastructure at all and no evidence is provided to demonstrate how LTN 1/20-compliant cycle infrastructure could be delivered within the highway limits. Bus services are not infrequent but bus stops are not to an acceptable standard. Rail access is impractical.

- Active Travel England (ATE) requires developments to enable at least 50% of short trips by sustainable modes by 2030. There is no likelihood of achieving this.
- The site would, for the above reasons, probably be overwhelmingly car-dependent.

Recommendations

The allocation of Site NES37 should be very carefully assessed for safe and sustainable travel to be a realistic proposition. If no such proof can be provided, the site should be removed from the Sheffield Plan due to continuing road safety hazards, unmitigable impact on the highway network, and failure to be able to meet sustainability requirements.

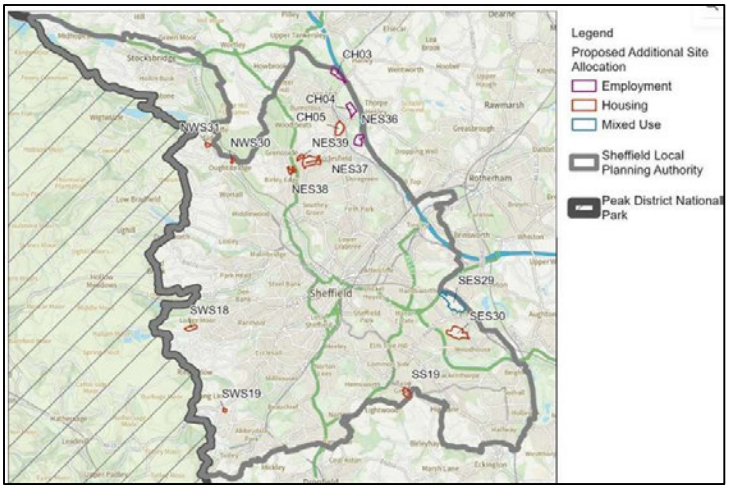
Should any development go ahead, Grampian-style conditions need to be imposed such that no development can commence until the issues of safety, traffic impact, sustainability and other concerns have been fully addressed and the associated works completed. If this is not possible then again the site should not proceed.

If sustainability aims are to be anywhere near successful, a robust Sustainability Strategy must be prepared in order to provide direct, safe walking and cycling links to Ecclesfield, Grenoside and Chapeltown, via new and improved footways and paths, segregated LTN 1/20-compliant cycle infrastructure, and improved bus infrastructure with fully compliant bus stops and shelters (raised bus boarder kerbs, tactile paving, bus stop clearways). These measures should also be enshrined in Grampian Planning Conditions.

More robust and accurate assessment needs to be made of the likely cumulative impact on the wider highway network, capturing realistic site SE37 traffic, known existing traffic problems, and known committed residential and commercial developments in Ecclesfield, Chapeltown, Grenoside, Thorpe Hesley etc.

“The Sheffield Plan”

Review of Proposed Accesses to Site NES38 ‘Land to the west of Grenoside Grange, Fox Hill Road, S35 8QS (S03028) and Holme Lane Farm, Halifax Road, S35 8PB (S03100)’



Map of Sites – SCC



Proposed Site Accesses – JEH Planning

April 2026

1 TERMS OF REFERENCE

Aprica ltd has been commissioned by a local interest group to comment on the highway implications for the proposed access arrangements for Site NES38 'Land to the west of Grenoside Grange, Fox Hill Road S35 8QS and Holme Lane Farm, Halifax Road S35 8PB', previously called sites S03028 and SO3100 respectively, and now combined by Sheffield City Council ('SCC') and hereafter referred to as 'NES38'. The sites have been identified in the proposed 'Sheffield Plan' ('the Plan') Consultation on Greenbelt land release for housing, commercial and other development.

The purpose of this report to is assess the transport and traffic implications of the current proposal. It is intended that this report be considered by the interest group with a view to submitting a formal response to SCC. The report is based on local knowledge, prevailing highway conditions and available documents, illustrative drawings etc.

Ian Taylor (I.Eng MICE) has produced this report. Ian is an Incorporated Engineer and a Member of the Institution of Civil Engineers, with thirty-five years' experience of public and private sector highway infrastructure disciplines including transportation planning, RoSPA accredited accident investigation & prevention, traffic management, road safety audits, traffic regulations, and highway design & construction. Ian has led on numerous major highway projects for Local Authorities and has presented at Planning Committees, Council meetings, public meetings and drop-in events, and at Public Inquiry.

2 INTRODUCTION

The scope of this report is to consider the proposed 'Main Modifications' for the Sheffield Plan (the Plan), for site NES38, two combined sites now comprising 6.72 hectare, proposed for the construction of 188 dwellings. The intention is to offer expert comments on the site's safe and practical useability by the travelling public, and the impact on the highway network.

For ease of reference this report is separated into the following parts:

1 Terms of Reference

2 Introduction and Executive Summary

3 Background

4 Assessment of Highway Proposals

5 Sustainability

6 Injury Collision Record

7 Other Factors to Consider

8 Conclusions and Recommendations

EXECUTIVE SUMMARY

This report provides independent highways and transport commentary on the proposed access arrangements and highway impact implications for Sheffield Plan site NES38 'Land to the west of Grenoside Grange, Fox Hill Road, and Holme Lane Farm, Halifax Road', a combined 6.72ha allocation currently indicated for approximately 188 dwellings.

Key Issues:

- Highway capacity risk: additional traffic would load onto an already constrained network with regular peak congestion, including the Skew Hill/Main Street bottleneck and the wider Ecclesfield/Chapeltown corridors.
- Local conditions reduce resilience (narrow sections, poor sightlines, obstructive on-street parking and school run pressures), increasing the risk of delay, rat-running, and conflict with vulnerable road users.
- Car dependency risk: steep topography and constrained widths (notably Salt Box Lane and parts of the A61 corridor) may limit the delivery of high-quality, inclusive walking/wheeling/cycling measures that meet current DfT/ATE requirements.
- Public transport: bus services exist but are affected by congestion; stops/facilities are generally basic and would require upgrades (e.g., kerbs, tactile paving, clearways and, where feasible, shelters) to be attractive and inclusive.
- Evidence gap: current information is insufficient to demonstrate soundness. Trip generation, layout and assumptions are not yet transparent, and TRICS-based rates may understate private car use given limited realistic alternatives.
- Cumulative impact: the effect alongside other committed/ongoing development in north Sheffield should be tested; a site-only assessment is unlikely to capture network pinch points and real-world driver behaviour.
- Safety: recorded injury collisions in the vicinity support a precautionary approach, with mitigation designed around vulnerable road users and safe routes to key destinations (including schools and Grenoside village centre).

Recommendations

- Detailed access designs and a robust Transport Assessment are required, including transparent trip-rate selection, sensitivity testing, and wider-area microsimulation of known pinch points (including Fox Hill Road/Salt Box Lane and Skew Hill/Main Street).
- Further assessment should include a formal active travel audit and a deliverable package of off-site walking/wheeling/cycling and crossing improvements that addresses ATE's 'last mile' connectivity, not just the site frontage.
- Should the site be progressed there would need to be a fully costed, deliverable mitigation and implementation programme (including public transport stop upgrades and service reliability measures where feasible), secured and delivered ahead of any development.
- If safe, policy-compliant access and sustainable travel measures cannot be proven deliverable (physically and financially), the allocation should be reconsidered and alternative sites sought.

3 BACKGROUND

Planning Inspectors have considered the 'Sheffield Plan' (the Plan) proposals under a number of stages of the Planning process including 'Regulation 19' of The Town and Country Planning (Local Planning) (England) Regulations 2012. Regulation 19 focused on four main tests of soundness, namely Positively Prepared: Based on a strategy that seeks to meet objectively assessed development and infrastructure requirements; Justified: Based on proportionate evidence; Effective: Deliverable over the plan period; Consistent with National Policy (such as the National Planning Policy Framework (NPPF). The Inspectors now consider the Plan to be 'sound and legally compliant subject to main modifications being agreed and made'. The Inspectors will essentially seek to determine whether adding a site or sites, such as NES38, makes the plan 'sound' (by meeting employment needs etc), or 'not sound' by creating unmitigable traffic issues. The modifications must still undergo detailed transport assessment, sustainability appraisal, habitats assessment, and public consultation and it can still be argued that the four main tests of soundness have not been satisfied because the proposed Main Modifications fail to resolve the infrastructure and highway safety issues identified during the examination.

The proposals still lack detail on, for example, precise numbers and layout of houses and acceptable likely trip data (see below under TRICS), which makes it difficult for Inspectors to make a final decision, and for consultees to offer fully considered responses. Neither is there sufficient mention, or demonstrable evidence, of the possible cumulative effect of the addition of the proposed greenfield sites to the many other committed and ongoing developments in and around Ecclesfield, Grenoside and Chapeltown, for example those in Oughtibridge, Deepcar, Thorpe Hesley, Hoyland and other nearby settlements. Several are either committed or already in construction in and around Ecclesfield, Chapeltown and Oughtibridge alone. It does not seem that the overall traffic impacts of these developments have been sufficiently considered in the individual site assessments for the Sheffield Plan, or as a whole.

Whilst it must be accepted that building on some Greenbelt land might offer more variety and choice of homes, and local employment opportunities, this should only be considered over Brownfield/urban development where it can be achieved without significant impact at the proposed site and in the wider area. More detail needs to be provided on, and more consideration given to, the impact on the existing local road network and how any proposals taken forward could be mitigated to eliminate or sufficiently reduce adverse effects. Should it not be possible to reduce adverse impacts to acceptable levels, these sites should be withdrawn and alternatives sought.

Because the sites are greenbelt sites the Inspectors require proposals to meet the 'Golden Rules' of the National Planning Policy Framework (NPPF). The Golden Rules state that for greenbelt release, sites must deliver 50% affordable housing, the upfront provision of necessary local infrastructure and the creation of enhanced, publicly accessible green spaces. This means that the developer must prove that they can mitigate the impact on local roads and provide the required improvement measures, preferably pre-commencement rather than pre-occupation to avoid construction traffic adding to the existing traffic problems. For the area in question this is likely to require a shift away from car dependency by prioritizing active and sustainable travel. Key infrastructure requirements include a mandatory capacity and safety assessment of the Fox Hill Road/Salt Box Lane crossroads junction, segregated walking and cycling routes to local schools and the village centre, upgraded bus stops and enhanced local bus service frequency.

In the previous review of the proposed Sheffield Plan (July 2025) Aprica assessed site NES38 (known then as S03028 and SO3100 and now combined). At that time no access arrangements were available. The earlier assessment is shown below along with the Council's assessment of suitability. Aprica's comments follow and largely still stand other than the collision statistics which have been updated, and the now identified proposed site accesses.

Green Belt site allocation appraisal (Housing)

Site Reference: S03028

Address: Land to the west of Grenoside Grange, Fox Hill Road, S35 8QS

Gross site area (Site Allocation*): 6.72 Hectares

Net housing area: 5.38 Hectares

Estimated housing capacity: 188 homes

Net employment area: 0.00 Hectares

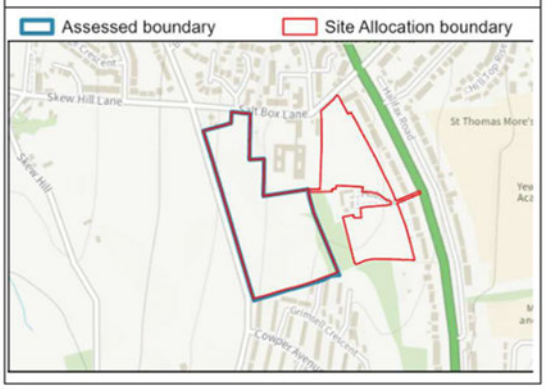
Ward: West Ecclesfield Ward

Housing Market Area: Chapeltown & Ecclesfield

Ownership: Private

*Note – Site combined with S03100 to form one allocation





Indicator	Indicator score	Indicator score result
Distance to core public transport network (CPTN)	NN	Site more than 1200m from the Core Public Transport Network
Access to active travel/cycle network	Y	Site within 400m of an existing off-carriageway cycle route
Potential to increase the viability of public transport or support investment in new public transport infrastructure	-	Site is beyond 400m of planned bus network improvement or 800m of planned tram/rail network improvement
Availability of local facilities and education capacity	YY	Site within 800m of 4 classes of local facility
	N	No current surplus capacity for either Primary or Secondary education
	YY	No community/leisure/recreation facilities on-site

- No potential highway capacity issues previously identified within 2km of the site
- Site is within 400m of a cycle route
- Footpaths on site should be retained
- Site is within 10-minute walk (800 metres) of a convenience shop and at least 3 other types of community facilities or important local services
- There is a primary school within 3.2km of the site (although no surplus capacity)
- There is a secondary school within 4.8km of the site (although no surplus capacity)
- There is a primary health care facility within 3.2km of the site
- Site more than 1200m from the Core Public Transport Network (as of December 2023)

Aprica comment:

- This site is rated double-negative (NN) for public transport, being over 1200m from the core public transport network
- The green (Y) rating for proximity to (within 400m) an active travel network is questionable, as it probably refers to the circular Route 67, more of a leisure loop around High Green, Wentworth, Thorpe Hesley and Parson Cross. Commuter cyclists are unlikely to find this loop beneficial, attractive, or of use to commute

- Bus travel enhancement is unlikely to be viable, with an unrated (yellow) rating for proximity to planned improvements. The service in this area is quite poor, with no service on a Sunday
- The site is rated double-positive (YY) for community/leisure/recreation facilities yet it is stated that there are none. This needs clarification
- School and healthcare facilities have a negative (N) rating and are too far away for sustainable travel and in any event the schools are full
- The access (known as Holme Lane) onto the A61 Halifax Road is entirely unsuitable as a vehicular access. It is a single width track between existing dwellings and emerges from the inside of a bend onto the A61. Safety camera warning signs are present, indicating that there might be a historical problem with vehicles exceeding the 30mph limit
- ~~Accesses onto Salt Box Lane and Fox Hill Road are not identified and would need to be considered further should this proposed site be progressed~~
- ~~There have been four serious injury collisions (seven casualties) and three slight injuries on the three roads in question (CrashMap 2019-2023)~~

4 ASSESSMENT OF HIGHWAY PROPOSALS FOR SITE NES38

Surrounding Network

Over the years SCC has carried out several feasibility studies for the area and some traffic management schemes have been introduced. For example High Street/St Michael's Road/Wordsworth Avenue traffic calming and improvements for pedestrians. Other studies have not resulted in any improvement schemes being taken forward. These include the High St/Yew Lane/Stocks Hill/Town End Road/Church Street loop, and a number of studies for Church St/Town End Road/The Wheel, where narrow streets, parking, visibility, pedestrian safety and parking have long been a serious concern and remain so. This is partly due to the physical inability to introduce measures due to narrow roads, restricted visibility, tight building lines etc).

Fox Hill Road and Salt Box Lane experience significant peak-time congestion, primarily due to the bottleneck at the Skew Hill/Main Street junction, which suffers from poor sightlines and heavy commuter flow toward the A61. The issue is made worse (a peak within the peak) by the 'school run' for Yewlands Academy, where narrow roads and parked cars often reduce traffic to a single lane. Additionally, these routes act as a frequent rat run for drivers trying to bypass main road delays. Because of this existing strain, the developers (two developers working together) will need to prove that their project won't make this congestion more severe.

Several other junctions, all the way from Grenoside to the M1, regularly become congested. The Common/Chapeltown Road/Ecclesfield Road suffers regular congestion and is one of the most notorious in North Sheffield. New homes, supermarkets and other new amenities have in recent years all exacerbated the long-standing traffic problems in and around Ecclesfield, Grenoside, Chapeltown and beyond.

Proposed Accesses

Vehicular accesses are now proposed, indicatively, from Fox Hill Road. Non-vehicular accesses are proposed at a number of other points including onto the A61 Halifax Road.



Proposed Site Accesses – JEH Planning

Local residents have been very vocal throughout the Sheffield Plan consultations raising several specific concerns regarding the proposed access points for site NES38, including at the October 2025 Inspectors' hearing sessions. Residents and community groups argue that the proposed access points on Salt Box Lane and Fox Hill Road are fundamentally 'unsound' because they feed into an already failing junction at Skew Hill, labelled as a dangerous blackspot. The Inspectors ultimately accepted the site's inclusion but only on the condition of Main Modifications to the Plan. These modifications strictly mandate that development cannot proceed without proven junction upgrades and a robust 'active travel' strategy to mitigate the 'severe' congestion and safety risks highlighted by the community. Residents remain sceptical, due to the site's steep topography (making walking/wheeling/cycling difficult and unattractive) and the significant on-street parking, being barriers to physical mitigation measures.



Obstructive Parking on The Narrow Footways, Salt Box Lane - Google

5 SUSTAINABILITY

In the UK, standards for sustainable travel and the hierarchy of travel modes are set by the Department for Transport's (DfT's) Manual for Streets (MfS) and Local Transport Note 1/20 (LTN 1/20). The DfT publishes the National Planning Policy Framework (NPPF). Paragraph 114 explicitly states that applications should "give priority first to pedestrian and cycle movements." The MfS is the go-to guide for urban design. It established the hierarchy that places pedestrians at the top and private cars at the bottom.

Active Travel England (ATE) is the government's Sustainable Travel Inspectorate. It reviews large planning applications (such as NES38) to ensure that they meet these standards. If a site is likely to be too 'car-dependent' ATE can formally object. ATE state that for sites such as NES38 active travel infrastructure must go beyond the immediate vicinity of the site. They look at the 'last mile' (i.e. journeys of a mile to and from the site) and expect high quality, inclusive corridors that utilise segregated paths to ensure that walking and cycling will be a mode of choice for accessing local services. ATE has categorised site NES38 as a high-risk location for 'car-dependency' due to its steep topography and the existing hostile road environment of Salt Box Lane. During the October 2025 hearings, ATE challenged the Council's focus on motor vehicle capacity, insisting that any mitigation at the Skew Hill/Main Street junction must instead prioritise LTN 1/20 compliant pedestrian and cycle infrastructure. ATE's intervention led to the January 2026 Main Modifications, which now mandate a formal "active travel audit" and the delivery of segregated, safe routes to Yewlands Academy and Grenoside village centre. ATE's stance is clear: '*development must not proceed unless it can be proven that walking, wheeling, and cycling are the most convenient and safest modes of transport for new residents from the outset*'.

Grenoside presents a particular challenge with over 30% of residents being aged 65 or more. This higher demographic skew, combined with the village's challenging topography, suggests that standard active travel mitigations such as cycle lanes may be less effective than improvements to public transport and mobility-scooter-friendly infrastructure. As the Census data is from 2021/2022 and the National trend is towards a population of ageing people, it is likely that the non-walking/cycling community has increased.

The South Yorkshire Mayoral Combined Authority (SYMCA) has been mandated by the DfT that all local transport authorities are required to review and update their statutory Local Transport Plans (LTP's) to align with current national and local priorities, and to provide a more consistent basis for determining future investment priorities. 'Connecting Sheffield' is part of the long-term vision for the future of travel in the city of Sheffield, creating high-quality, convenient and safer routes into and around the city for cycling, walking and public transport. Funding has been made available, from central Government and other sources, to deliver work that aims to transform the city and enable people to make better travel choices. The website https://haveyoursay.sheffield.gov.uk/connecting-sheffield gives updates on projects. At present there are none in the vicinity of site NES38 or north Sheffield in general, but hopefully a case will be made for at least some studies in the area.

For site NES38 the hierarchy of travel modes – 1. Walking, 2. Cycling & wheeling, 3. Public transport, 4. Private car – needs more consideration and more detail provided on what active and sustainable travel measures can and will be provided where. Whilst some sections of the existing highway lend themselves to such measures some, such as Salt Box Lane, do not.

Sustainable Travel Modes

1. Walking: Around site NES38, pedestrian facilities are severely restricted in places. Fox Hill Road has the width to introduce LTN 1/20 compliant infrastructure, but Salt Box Lane does not and it would be difficult to introduce on the A61 Halifax Road. As mentioned above, the area has a challenging topography, with most gradients being 1 in 10 to 1 in 15, far exceeding the 1 in 20 threshold for inclusive mobility. The current lack of controlled crossing points, for example at Fox Hill Road/Salt Box Lane, in Grenoside itself and at the Salt Box Lane/A61 junction, create severance and pose a high risk to vulnerable road users. Without a comprehensive programme of off-site 'walking and wheeling' infrastructure, the site would remain isolated from core community areas. It seems unlikely, due to the constricted highway boundaries and the gradients, that ATE's requirements for pedestrians can be met.

2. Cycling: Much as for walking, the roads are steep in places and there are no cycle measures whatsoever. Only the most serious cyclists would be likely to cycle to site NES38 and back. In places it seems a physical impossibility to meet ATE's requirements for fully segregated cycle infrastructure.

3. Public Transport: Bus services are not infrequent but reliability is adversely affected by congestion and bottlenecks. Buses on services such as the 86 can often become full, even with the 20 minute frequency. Even more regular services would be required in order to make bus travel a mode of choice.

There are no bus stops on the site frontage on Fox Hill Road, the nearest stops being some 150 and 350 metres from the proposed accesses. Adding the internal site distance could put the stops further away than ATE's recommended 400 metre maximum. The northbound stop on Salt Boxx Lane would be a steep 120 metre walk to the pedestrian site entrance. Most bus stops are simple bus stop 'flags'. Current requirements are for raised bus boarder kerbs, tactile paving for partially sighted users, bus stop clearway markings, and preferably shelters. It is difficult to imagine how all this could be accommodated, along with ATE's requirement for at least 2 metres of clear footway, bearing in mind the constricted highway widths in the area.



Outdated Bus Stops on Salt Box Lane - Google

At almost 5km away (from the site centre), Chapeltown Railway Station is beyond viable pedestrian reach and unlikely to appeal to all but the most committed cyclists. This leaves just bus travel on the sustainable travel ‘list’. Site NES38 is linked to the railway station by the 86 bus service, which stops around 200 metres from the station. The service's infrequency during evenings and weekends, and its susceptibility to peak-hour congestion, mean that it does not function as a 'bus-to-rail link’. To mitigate car dependency, the Sheffield Plan highlights the need for enhanced synchronisation between the 86 bus and train departure times at Chapeltown.

4. Private Car: Since sustainable travel modes are unlikely to be made sufficiently attractive, bearing in mind the topography, constricted road widths and the age demographic, the car is highly likely to be the main mode of transport for people living in or visiting the houses on the proposed site.

Trip Generation and TRICS

TRICS is ‘Trip Rate Information Computer System’. It is effectively an industry-standard historical library of traffic figures. When developers want to build something new – such as housing or commercial space – they must demonstrate how much extra traffic the development will put on the highway network. Because the development doesn't yet exist the developer uses TRICS and its database to assess and demonstrate what has happened at similar sites in the past.

Whilst TRICS contains thousands of real-world traffic counts from across the UK and Ireland, its outputs are often controversial and site NES38 is no exception. Site NES38 faced specific TRICS-related challenges during the 2025 hearings. Critics argue that the Council’s reliance on standard 'suburban' trip rates was flawed because it failed to account for Grenoside’s steep topography and the resulting 'mobility barrier' for its elderly population. This led to a formal challenge of the transport modelling, with the Planning Inspectors consequently mandating a more robust, site-specific assessment that accounts for the 'hill factor' and current bus reliability. Developers naturally want to demonstrate the minimum impact on the highway network and might therefore cherry pick test sites. Critics argue that Planners should design for a typical busy day (called the 85th percentile), whilst Developers prefer to use the average day (the mean) which makes the impact look smaller. Thus, in real-world terms actual traffic volumes and impacts are very often significantly worse than those predicted by TRICS. Driver and other road user behaviour in ‘the real world’ is not like a computer model in any case. A common example would be where drivers stop in long lines of slow-moving main road traffic to let single vehicles in or out of minor junctions or driveways, thereby impacting on dozens of following main road vehicles.

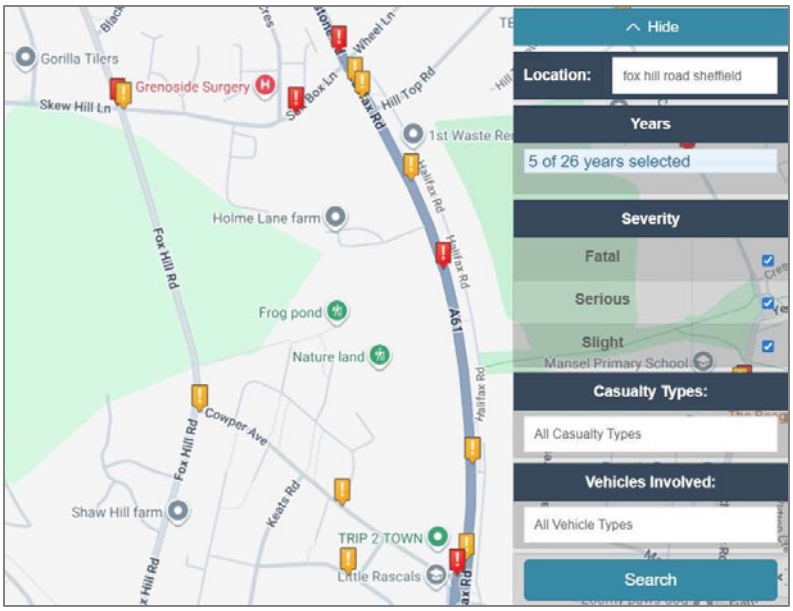
Aprica does not have the software or expertise to challenge TRICS (Trip Rate Information Computer System) and to do so would take many hours. It is therefore beyond the remit of this report but the core issue for Site NES38 seems to be the discrepancy between the theoretical models used by SCC and the likely reality of trip generation and modal transport choice.

The data should be closely checked to ensure its soundness and, if necessary, re-run using data appropriate for busy congested roads with nearby schools and other developments, such as is the case at site NES38. As mentioned above, experience has shown that in practice actual trip numbers (especially for private vehicles) are very often higher than those suggested in Transport Assessments (TA’s). Software can easily be used to manipulate and ‘adjust’ modelled outcomes, whereas in real-world circumstances, people’s behaviour and choices dictate what actually happens.

TRICS is, in any case, just a library of numbers and predicts trip numbers based on existing, similar, sample sites. It cannot model the cumulative impact of development on, say, nearby major junctions. A full micro-simulation model should be built, using software such as VISSIM ("Verkehr In Städten SIMulationsmodell" - which translates to "Traffic in Cities - Simulation Model") to show actual traffic modelling for the wider area rather than just numbers for a 'site'.

6 INJURY COLLISION RECORD

'CrashMap' is a website that uses official government data (the STATS19 database) collected by police forces across the country, to allow users to see where, when, and (for a fee) how road traffic collisions (RTC's) are occurring in their local area. The CrashMap data for the latest verified five-year period (2020 to 2024 inclusive) is shown below. There have been several slight (shown amber) and serious (shown red) injuries in the area of the site and on surrounding roads. In terms of the number of injury collisions, it should be noted that although there is little published data on unreported collisions, the Department for Transport (DfT) suggests that '*for every reported and recorded injury collision there could be as many as 5 unreported injury collisions and 20 damage-only collisions*'. Near misses could be as many as 300 per recorded injury collision.



Injury Collisions – CrashMap

7 OTHER FACTORS TO CONSIDER

The Statement of Common Ground (SOCG) between SCC and Norfolk Estates agrees that: '*The site can be safely accessed via two points on Fox Hill Road, with additional pedestrian and cycle access proposed onto Salt Box Lane; The site benefits from proximity to regular bus services on Fox Hill Road, Salt Box Lane, and Halifax Road, supporting sustainable travel for future residents; Highways, transport, and road safety matters do not present barriers to the site's allocation or delivery; The development will enhance sustainable and active travel by improving the public footpath network across the site, increasing accessibility to the wider Green Belt.*' It is agreed that a Transport Assessment will accompany future planning applications to promote sustainable travel

options. Discussions continue regarding the extent of ecological buffers and the flexibility to provide infrastructure within the Local Wildlife Site, ensuring a balance between connectivity and environmental protection. Should the site progress, these further investigations and surveys will not just be needed, they will need to prove that the measures can be successfully introduced. They will need to include detailed access designs, more detailed trip generation data and mitigation of traffic and road safety issues. The planning process will require compliance with national and local policies on highways, traffic, and road safety for pedestrians, cyclists and other users, and in terms of connected sustainable travel.

The National Planning Policy Framework (NPPF) and SCC' own Policies resist the coalescence of settlements and Greenbelt land is scored in terms of importance against such sprawl. Residents argue that developing the site would cause coalescence by significantly narrowing the green buffer between Grenoside and Ecclesfield. Critics, supported by the Campaign to Protect Rural England (CPRE), argue that '*the development violates a core purpose of the Green Belt by eroding the distinct 'valley gap' that separates these communities'*. To address this, the 2026 Main Modifications mandate *'substantial landscape buffering*' on the site's eastern boundary to prevent a perceived merge and to protect the visual integrity of the Robin Brook corridor. This remains a major bone of contention with residents and the CPRE, who maintain that, especially when viewed alongside site NES39, there would be a failure to protect the Green Belt's role in preventing settlement merger.

Air Quality

Whilst site NES38 lies just outside the city-wide Sheffield Air Quality Management Area (AQMA), air quality is a material concern due to the site's proximity to the A61 corridor and the vulnerability of Grenoside's aging demographic. Evidence submitted in 2025 (REF1.0251) suggests that whilst national NO2 limits may be met, current levels already exceed World Health Organisation (WHO) guidelines. The Main Modifications require the developer to provide an Air Quality Assessment that accounts for the cumulative impact of construction dust and increased traffic at the Skew Hill bottleneck.

8 CONCLUSIONS AND RECOMMENDATIONS

Conclusions

More evidence needs to be provided, bearing in mind the known issues around site NES38, to show that the proposed accesses would be safe and conducive to sustainable travel. Further development at this location could be inappropriate based on the known congestion problems and the challenges to creating safe ,sustainable connections to the wider area. Proposals would need to be compliant with National Planning Policy and are probably not physically deliverable given the available highway widths and steep topography.

Of the 'Four Points' mentioned in Section 3 above, the Inspectors should note the following:

Positively Prepared: The proposals do not currently meet 'objectively assessed development' or 'infrastructure requirements':

- The assessments to date appear to have been rushed in effort to meet SCC's time constraints and seem optimistically in favour of the proposed development, giving little thought to wider and cumulative impact.
- The consultation documents provide no confidence that the local highway network would be able to cope with the increase in traffic demand or that local and national policy and objectives, such as active and sustainable travel, could be achieved.

Justified: The proposals are not based on proportionate evidence:

- The allocation of site NES38 is not currently supported by proportionate or complete transport evidence. The cumulative impact of this and major neighbouring developments, in an already badly congested area, is concerning.
- TRICS data is questionable. If its outputs are not based on like-for-like samples it is possible that the site could generate significantly higher private car movements, compounded by lower than projected sustainable travel figures.

Effective: Deliverable over the plan period:

- The site cannot be made safe and sound without major external highway works and even then would be likely to present additional hazards for vulnerable road users (i.e. those walking, wheeling and cycling). It is therefore unlikely that acceptable proposals, in terms of Policy etc, could be delivered within an agreed period, if at all.

Consistent with National Policy: The proposals are not consistent with Policy such as the NPPF.

- The proposals do not currently offer enough sustainable transport improvements in an area where they are inadequate at present. The topography and constrained widths do not lend themselves to introducing such measures.
- In terms of sustainability, walking to and from the site is unlikely due to the unattractive footways and significant gradients. Footways are narrow or non-existent in places. There is no cycle infrastructure at all and no evidence is yet provided to demonstrate how LTN 1/20-compliant (segregated) cycle infrastructure could be delivered within the highway limits. Bus services are not infrequent but are not frequent or reliable enough. Bus stops are not to an acceptable standard. Rail access is impractical.
- Active Travel England (ATE) requires developments to enable at least 50% of short trips by sustainable modes by 2030. There is no likelihood of achieving this.
- The site would, for the above reasons, probably be overwhelmingly car-dependent.

Recommendations

The allocation of Site NES38 should be carefully assessed for safe and sustainable travel to be a realistic proposition. If no such proof can be provided, the site should be removed from the Sheffield Plan due to continuing road safety hazards, unmitigable impact on the highway network, and failure to be able to meet sustainability requirements.

Should any development go ahead, Grampian-style conditions need to be imposed such that no development can commence until the issues of safety, traffic impact, sustainability and other concerns have been fully addressed and the associated works completed. If this is not possible then the site should not proceed.

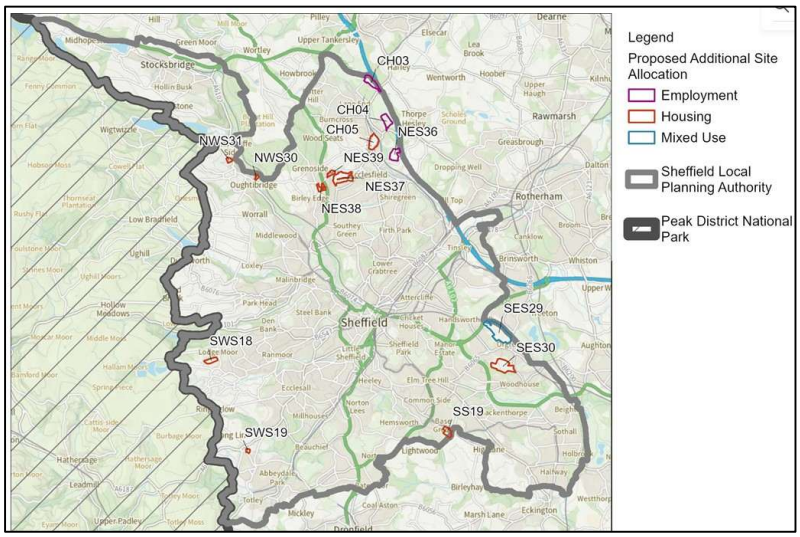
If sustainability aims are to be anywhere near successful, a robust Sustainability Strategy must be prepared in order to provide direct, safe walking and cycling links to Grenoside and beyond, via new and improved footways and paths, segregated LTN 1/20-compliant cycle infrastructure, and improved bus infrastructure with fully compliant bus stops and shelters (raised bus boarder kerbs, tactile paving, bus stop clearways). These measures should also be enshrined in Grampian Planning Conditions.

More robust and accurate assessment needs to be made of the likely cumulative impact on the wider highway network, capturing realistic site SE38 traffic figures, known existing traffic problems, and known committed residential and commercial developments in Grenoside, Ecclesfield, Chapeltown and Thorpe Hesley.

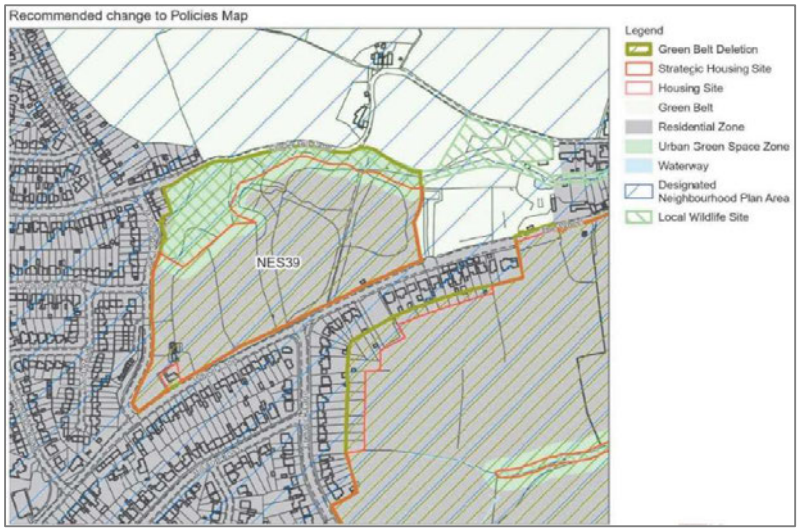
“The Sheffield Plan”

Review of Proposed Access to Site NES39 ‘Land at Wheel Lane and Middleton Lane, S35 8PU’

(also previously referred to by Sheffield City Council as Site S03035)



Map of Sites – SCC



Site Boundary - SCC

April 2026

1 TERMS OF REFERENCE

Aprica ltd has been commissioned by a local interest group to comment on the highway implications for the proposed access arrangements for Site NES39 (also previously called sites S03035 by Sheffield City Council) 'Land at Wheel Lane and Middleton Lane, S35 8PU', hereafter referred to as 'NES39', one of the sites identified in the proposed 'Sheffield Plan' ('the Plan') Consultation Documents.

The purpose of this report is to assess the transport and traffic implications of the current proposals. It is intended that this report be considered by the interest group with a view to submitting a formal response to Sheffield City Council ('SCC'). The report is based on local knowledge, prevailing highway conditions and available documents, illustrative drawings etc.

Ian Taylor (I.Eng MICE) has produced this report. Ian is an Incorporated Engineer and a Member of the Institution of Civil Engineers, with thirty-five years' experience of public and private sector highway infrastructure disciplines including transportation planning, RoSPA accredited accident investigation & prevention, traffic management, road safety audits, traffic regulations, and highway design & construction. Ian has led on numerous major highway projects for Local Authorities and has presented at Planning Committees, Council meetings, public meetings and drop-in events, and at Public Inquiry.

2 INTRODUCTION

The scope of this report is to consider the proposed 'Main Modifications' for the Sheffield Plan (the Plan), for site NES39, a site of 5.30 hectares, proposed for the construction of 148 dwellings (subject to reduction as discussed below). The intention is to offer expert comments on the site's safe and practical useability by the travelling public, and the impact on the highway network.

For ease of reference this report is separated into the following parts:

1 Terms of Reference

2 Introduction and Executive Summary

3 Background

4 Assessment of Highway Proposals

5 Sustainability

6 Injury Collision Record

7 Other Factors to Consider

8 Conclusions and Recommendations

EXECUTIVE SUMMARY

This report reviews the highway and transport implications of Site NES39 ‘Wheel Lane/Middleton Lane’ within the Sheffield Plan Main Modifications. On current evidence, there is a risk of unacceptable impact unless major, deliverable mitigation is secured up front.

Key Issues

- Access feasibility/safety: constrained highway widths, on-street parking and sub-standard footways might physically prevent compliant improvement measures, visibility and safe crossing provision.
- Network impact and cumulative effects: existing peak and school run congestion means NES39 (with NES37 and other commitments) could materially worsen delays, queuing and rat-running.
- Car dependency: limited public transport and poor walking/cycling conditions/topography make sustainable mode share targets unlikely.
- Evidence gap: access design, location, assumptions and cumulative testing are not yet sufficiently evidenced to conclude that impacts are acceptable and mitigable.
- Deliverability/phasing: scale, funding and highway constraints create a risk that mitigation is delayed or undeliverable within the plan period.

Recommendations

- A single masterplan and joint infrastructure delivery plan for NES39 and NES37 (access, internal connections, permeability/rat-running controls, phasing and funding).
- Withhold support/progression unless an adoptable, policy-compliant solution is demonstrated (visibility, junction capacity, pedestrian/cycle facilities and parking management).
- Secure “no development/occupation until delivered” conditions (Grampian-style) for critical off-site highway and active travel works.
- Require a robust cumulative transport assessment with sensitivity tests (higher car mode share and school run peaks) using appropriate modelling.
- If compliant access, mitigation and sustainable travel measures cannot be evidenced as feasible and funded, withdraw NES39 in favour of more sustainable alternatives.

3 BACKGROUND

Planning Inspectors have considered the 'Sheffield Plan' (the Plan) proposals under a number of stages of the Planning process including 'Regulation 19' of The Town and Country Planning (Local Planning) (England) Regulations 2012. Regulation 19 focused on four main tests of soundness, namely Positively Prepared: Based on a strategy that seeks to meet objectively assessed development and infrastructure requirements; Justified: Based on proportionate evidence; Effective: Deliverable over the plan period; Consistent with National Policy (such as the National Planning Policy Framework (NPPF). The Inspectors now consider the Plan to be 'sound and legally compliant subject to main modifications being agreed and made'. The Inspectors will essentially seek to determine whether adding a site or sites, such as NES39, makes the plan 'sound' (by meeting employment needs etc), or 'not sound' by creating unmitigable traffic issues. The modifications must still undergo detailed transport assessment, sustainability appraisal, habitats assessment, and public consultation and it can still be argued that the four main tests of soundness have not been satisfied because the proposed Main Modifications fail to resolve the infrastructure and highway safety issues identified during the examination.

The proposals still lack detail on matters such as access design, number and layout of houses, number of people employed in the case of employment space, and acceptable likely trip data (see below under TRICS), which makes it difficult for Inspectors to make a final decision, and for consultees to offer fully considered responses. Neither is there sufficient mention, or demonstrable evidence, of the possible cumulative effect of the addition of the proposed Greenbelt sites to the many other committed and ongoing developments in and around Ecclesfield, Grenoside and the wider area. It does not seem that the overall traffic impacts of these and other developments have been sufficiently considered in the individual site assessments for the Sheffield Plan, or as a whole.

Whilst it must be accepted that building on some Greenbelt land might offer more variety and choice of homes, along with local employment opportunities, this should only be considered over Brownfield/urban development where it can be achieved without significant impact at the proposed sites and in the wider area. More detail needs to be provided on, and more consideration given to, the impact on the existing local road network and how any proposals taken forward could be mitigated to eliminate or sufficiently reduce adverse effects. Should it not be possible to reduce adverse impacts to acceptable levels, sites should be withdrawn and alternatives sought.

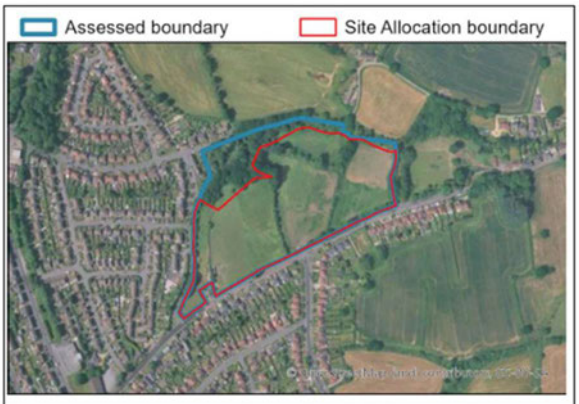
Because the sites are greenbelt sites the Inspectors require proposals to meet the 'Golden Rules' of the National Planning Policy Framework (NPPF). The Golden Rules state that for greenbelt release, sites must deliver 50% affordable housing, the upfront provision of necessary local infrastructure and the creation of enhanced, publicly accessible green spaces. This means that the developer must prove that they can mitigate the impact on local roads and provide the required improvement measures, preferably pre-commencement rather than pre-occupation to avoid construction traffic adding to the existing traffic problems. For the area in question this is likely to mean realignment of Wheel Lane to provide adequate visibility splays, prevention of 'rat running' through Middleton Lane, and possible traffic calming. It is proposed that NES39 and NES37 have a unified road network. High quality comprehensive active sustainable travel measures will also be required, connecting new homes to the Grenoside centre etc.

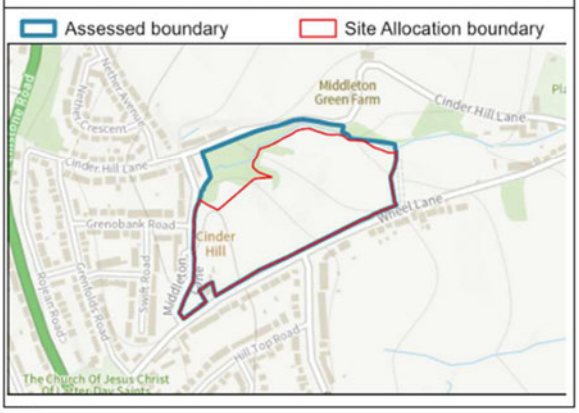
In the previous review of the proposed Sheffield Plan (July 2025) Aprica assessed site NES39 (known then as S03035). At that time no access arrangements were available. The earlier assessment is shown below along with the Council's assessment of suitability. Aprica's comments follow and largely still

stand other than the collision statistics which have been updated, and the now agreed access from somewhere along Wheel Lane (to be confirmed in detailed designs).

Green Belt site allocation appraisal (Housing)

Site Reference: S03035
Address: Land at Wheel Lane and Middleton Lane, S35 8PU
Gross site area (Site Allocation): 5.30 Hectares
Net housing area: 4.24 Hectares
Estimated housing capacity: 148 homes
Net employment area: 0.00 Hectares
Ward: West Ecclesfield Ward
Housing Market Area: Chapeltown & Ecclesfield
Ownership: Private





Page **52** of **332**

Indicator	Indicator score	Indicator score result
Distance to core public transport network (CPTN)	NN	Site more than 1200m from the Core Public Transport Network
Access to active travel/cycle network	-	Site beyond 400m of an existing or proposed route which is at LTN1/20 standard
Potential to increase the viability of public transport or support investment in new public transport infrastructure	-	Site is beyond 400m of planned bus network improvement or 800m of planned tram/rail network improvement
Availability of local facilities and education capacity	Y	Site within 800m of 3 classes of local facility
	N	No current surplus capacity for either Primary or Secondary education
	YY	No community/leisure/recreation facilities on-site

- No potential junction capacity issues previously identified within 2km of the site.
- Site is more than 5km from the M1 or A616, so risk of congestion on those roads is lower.
- There is a primary school within 3.2km of the site (although no surplus capacity).
- There is a secondary school within 4.8km of the site (although no surplus capacity).
- There is a primary health care facility within 3.2km of the site.

- Site more than 1200m from the Core Public Transport Network (as of December 2023).
- Site is more than a 10-minute walk (800 metres) to a convenience shop and at least 3 other types of community facilities or important local services.
- Site is further than 400m from an active travel/cycle network. Footpaths onsite should be retained

Aprica comment:

- This site is rated double-negative (NN) for public transport, being over 1200m from the core public transport network
- The site is unrated (yellow) for proximity to an active travel network, being over 400m from an existing or proposed route. The nearest route would be Route 67, which is more of a circular leisure loop around High Green, Wentworth, Thorpe Hesley and Parson Cross. Commuter cyclists are unlikely to find this loop beneficial, attractive, or of use to commute
- Bus travel enhancement is unlikely to be viable, with an unrated (yellow) rating for proximity to planned improvements. In reality the nearest bus stop is the two-hourly Hillsborough to Harley service, not going to or from the city centre. There is no service on a Sunday

- School and healthcare facilities have a negative (N) rating and are too far away for sustainable travel and in any event the schools are full
- The site is rated double-positive (YY) for community/leisure/recreation facilities yet it is stated that there are none. This needs clarification
- ~~There has been one slight injury on the roads in question, specifically Wheel Lane (CrashMap 2019-2023)~~
- ~~Accesses onto Wheel Lane, Middleton Lane and Cinder Hill Lane are not identified and would need to be considered further should this proposed site be progressed~~

4 ASSESSMENT OF HIGHWAY PROPOSALS FOR SITE NES39

Surrounding Network

Over the years SCC has carried out several feasibility studies for the area and some traffic management schemes have been introduced. For example High Street/St Michael's Road/Wordsworth Avenue traffic calming and improvements for pedestrians. Other studies have not resulted in any improvement schemes being taken forward. These include the High St/Yew Lane/Stocks Hill/Town End Road/Church Street loop, and a number of studies for Church St/Town End Road/The Wheel, where narrow streets, parking, visibility, pedestrian safety and parking have long been a serious concern and remain so. This is partly due to the physical inability to introduce measures due to narrow roads, restricted visibility, tight building lines etc).

Several junctions all the way from Grenoside to the M1 regularly become congested. The Common/Chapeltown Road/Ecclesfield Road suffers regular congestion and is one of the most notorious in North Sheffield. New homes, supermarkets and other new amenities have in recent years all exacerbated the long-standing traffic problems in and around Ecclesfield, Grenoside and Chapeltown.

The Wheel, Yew Lane and Creswick Lane are arterial routes between Ecclesfield, Grenoside and wider destinations via the A61 and M1. These junctions are nearly always overloaded during the morning and evening peaks.

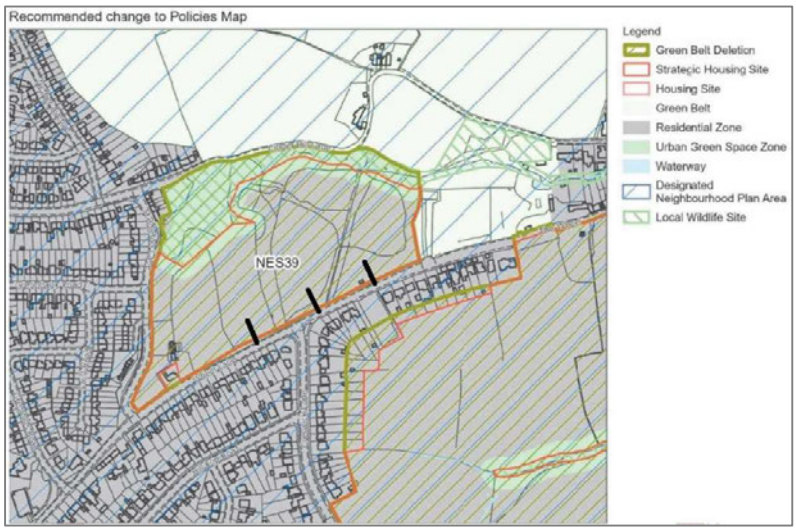
In addition to local roads being heavily congested at peak periods, the situation is greatly exacerbated by the school run, which is a variable in the localised congestion patterns in this topographically constrained area. The existing traffic associated with Yewlands Academy (around 900 students), St Thomas More Catholic School (around 200 students), Grenoside Primary School (over 300 students), and the Ecclesfield Primary and Secondary schools (for those with children at different schools), all create a concentrated volume of movement at 'school run' times, which clashes with commuter flows. Adding housing on NES39, and over 600 at NES37 along with another school and a burial ground, would add significantly to the known existing issues.

Inspectors have stated that '*Development of the site should complement and not adversely affect the delivery of the housing allocation NES37 which is located on the opposite side of The Wheel. This includes working collaboratively on the production and implementation of a single infrastructure delivery plan as required by Policy DC1*'. They have also stated that '*key considerations include retaining the public footpath, providing a 15-metre buffer to the adjacent ancient woodland, addressing flood risk, assessing and remediating potential land contamination, and implementing heritage and archaeological mitigation measures as recommended in the Heritage Impact*

Assessment. These requirements ensure sustainable, safe, and policy-compliant development of the site'.

Proposed Access

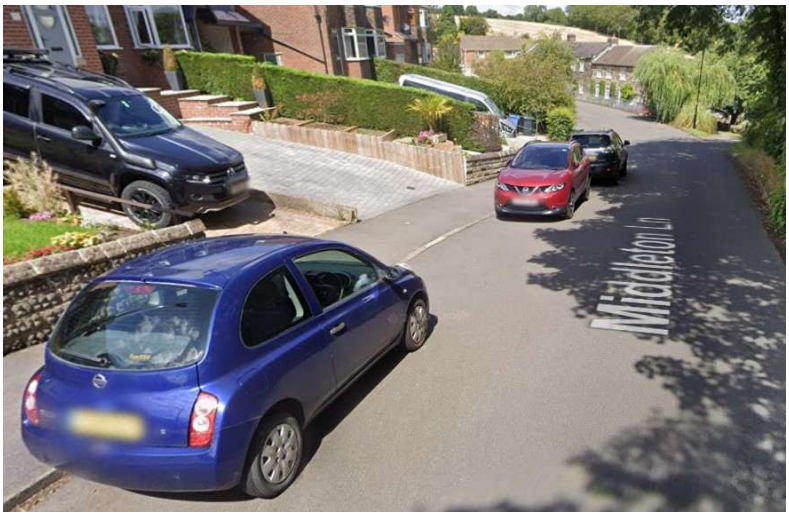
Vehicular access is proposed from Wheel Lane. The detail is to be determined through further assessment but it is understood that at the Inspectors' Hearing in October 2025 (see Section 7 below) three possible locations were discussed and agreed in principle with SCC.



Proposed Site Boundary Annotated To Show The Three Possible Locations for the Access - SCC

Local residents have stated to the Planning Inspectors that they often face long waits just to get from their driveways onto Wheel Lane. Another access on this already difficult section of highway would make matters far worse. Congestion can occur at any time of day but at 'school run' times the local roads can become a no-go zone. Roads are very narrow in places and arguably, as former local rural lanes now carrying thousands of vehicles, unsuitable for even more traffic. Parking on-street is commonplace and drivers often obstruct footways by parking partially on them.

Middleton Lane and Cinder Hill Lane are both narrow. On-street parking takes place on both roads, Cinder Hill Lane becoming too narrow to park on.



Parking on Middleton Lane – Google

The existing footpath, through the site to Cinder Hill Lane, is proposed to be retained and enhanced. A new footpath is proposed from the site to Middleton Lane. Local residents are concerned that this would mean the significant loss of trees, hedges, watercourse vegetation and historic stone walls.



Cinder Hill Lane Footpath Across Site - Google

Without careful internal planning and physical measures, internal roads at the development could create a rat-run to Middleton Lane, something that the Inspectors have raised. If the site is progressed, further assessment of the indicative access and internal layout needs to be made, with detailed designs being drawn up and assessed.

5 SUSTAINABILITY

In the UK, standards for sustainable travel and the hierarchy of travel modes are set by the Department for Transport's (DfT's) Manual for Streets (MfS) and Local Transport Note 1/20 (LTN 1/20). The DfT publishes the National Planning Policy Framework (NPPF). Paragraph 114 explicitly states that applications should "give priority first to pedestrian and cycle movements." The MfS is the go-to guide for urban design. It established the hierarchy that places pedestrians at the top and private cars at the bottom.

Active Travel England (ATE) is the government's Sustainable Travel Inspectorate. It reviews large planning applications (such as NES39) to ensure that they meet these standards. They mandate that active travel infrastructure must go beyond the immediate vicinity of the site, and they look at the 'last mile' (i.e. journeys of a mile to and from the site), expecting high quality, inclusive corridors that utilise segregated paths to ensure that walking and cycling will be a mode of choice for accessing local services. If a site is likely to be too 'car-dependent' ATE can formally object.

ATE state that for site NES39: '*The rural character of Grenoside should be protected; A unified infrastructure plan is required with the adjacent site NES37, with an integrated internal road and path network to prevent fragmented traffic impacts and reduce car dependency*'. To mitigate the loss of Greenbelt land, the Planning Inspectors ordered a significant reduction in housing capacity (from 148 to around 70 units) to allow for a 2.1 hectare strategic green buffer along the northern and eastern boundaries. ATE has said that '*the site must deliver high-permeability pedestrian and cycle links, specifically a new soft gateway to Middleton Lane and the enhancement of the existing public right of way toward Cinder Hill Lane'*.

The South Yorkshire Mayoral Combined Authority (SYMCA) has been mandated by the DfT that all local transport authorities are required to review and update their statutory Local Transport Plans (LTP's) to align with current national and local priorities, and to provide a more consistent basis for determining future investment priorities. 'Connecting Sheffield' is part of the long-term vision for the future of travel in the city of Sheffield, creating high-quality, convenient and safer routes into and around the city for cycling, walking and public transport. Funding has been made available, from central Government and other sources, to deliver work that aims to transform the city and enable people to make better travel choices. The website https://haveyoursay.sheffield.gov.uk/connecting-sheffield gives updates on projects. At present there are none in the vicinity of site NEES37 or north Sheffield in general, but hopefully a case will be made for at least some studies in the area.

For site NES39 the hierarchy of travel modes – 1. Walking, 2. Cycling & wheeling, 3. Public transport, 4. Private car – needs more consideration and more detail provided on how active and sustainable travel can genuinely be achieved, before the site progresses. This is explored in more detail below.

Sustainable Travel Modes

1. Walking: Around site NES39, pedestrian facilities are severely restricted. Wheel Lane and The Wheel have sub-standard footway widths (less than 1 metre wide in places) and obstructions such as house and garden walls which prevent adherence to LTN 1/20 accessibility standards. The area also has a challenging topography, with gradients often exceeding the 1 in 20 threshold for inclusive mobility. ATE has classified NES39 as a topographically sensitive site. Whilst acknowledging the natural 8 to 12% slopes, ATE has called for a design-led mitigation strategy. This requires the developer to bypass existing steep highway gradients by creating a contour-following internal

network. All primary pedestrian links must adhere to LTN 1/20 standards, ensuring a maximum 5% gradient by the use of switchbacks and mandatory 2 metre level ‘landings’ for every 500mm of vertical rise. This is essential to ensure that the development meets national 'Inclusive Mobility' standards and the legal requirements of the Equality Act 2010. The current severance caused by the A61 creates a high-risk environment for vulnerable road users. Without a comprehensive program of off-site 'walking and wheeling' infrastructure, the site, along with NES37, remains isolated from community core areas. It seems unlikely, due to the constricted highway boundaries and the gradients, that ATE’s requirements for pedestrians can be met.



Wheel Lane Footways Narrow and Obstructed - Google



Middleton Lane Footway Narrow and Obstructed - Google

2. Cycling: Much as for walking, the roads are steep in places and there are no cycle measures whatsoever. Only the most serious cyclists would be likely to cycle to site NES39 and back. It seems a physical impossibility to meet ATE’s requirements for fully segregated cycle infrastructure, especially with the steep topography in the area.

3. Public Transport: Bus services are infrequent (the M92 being two-hourly and the 765 being a school bus). There are no stops on Cinder Hill Lane and no services on Middleton Lane. Most bus

stops are simple bus stop ‘flags’. Current requirements are for raised bus boarder kerbs, tactile paving for partially sighted users, bus stop clearway markings, and preferably shelters. It is difficult to imagine how all this could be accommodated, along with ATE’s requirement for at least 2 metres of clear footway, bearing in mind the constricted highway widths in the area.



Outdated Overgrown and Obstructed Bus Stops on Wheel Lane – Google

At almost 5km away (at least an hour’s walk including steep gradients), Chapeltown Railway Station is beyond viable pedestrian reach and unlikely to appeal to all but the most committed cyclists. This leaves just bus travel on the sustainable motorised travel list. In order for rail travel to be viable, a feeder bus service would be required, with reliable and consistent (15 minutes or less) timetabling. This is unlikely to happen, other than under short-term Travel Plan incentives, leaving just the car for travel to and from a railway station.

4. Private Car: Since sustainable travel modes are currently poor and unlikely to be made sufficiently attractive, the car is highly likely to be the main mode of transport for people living in or visiting the houses, school or burial ground on the proposed site.

Trip Generation and TRICS

TRICS is ‘Trip Rate Information Computer System’. It is effectively an industry-standard historical library of traffic figures. When developers want to build something new – such as housing or commercial space – they must demonstrate how much extra traffic the development will put on the highway network. Because the development doesn't yet exist the developer uses TRICS and its database to assess and demonstrate what has happened at similar sites in the past. Developers naturally want to demonstrate the minimum impact on the highway network and might naturally cherry pick test sites.

Whilst TRICS contains thousands of real-world traffic counts from across the UK and Ireland, its outputs are often controversial and site NES39 is no exception. The traffic impact assessments TIA’s) for sites NES39 and NES37 have been challenged on the grounds of TRICS data suitability, specifically regarding the selection of locational proxies. Critics allege that the standard trip rates applied do not account for Grenoside’s severe topographical gradients and that the TRICS methodology fails to identify the 'peak within a peak' demand generated by the co-location of housing

and education facilities. In addition it has been suggested, in regard to the adjacent NES37 site, that there are no combined housing/burial ground sites in the TRICS 'library'. All of this leads to the potential underestimation of traffic figures and over-estimation of sustainable travel take up. Critics also argue that Planners should design for a typical busy day (called the 85th percentile), whilst Developers prefer to use the average day (the mean) which makes the adverse impact look smaller. Thus, in real-world terms, actual traffic volumes and impacts are very often significantly worse than those predicted by TRICS. Driver and other road user behaviour in 'the real world' is not like a computer model in any case. A common example would be where drivers stop in long lines of slow-moving main road traffic to let single vehicles in or out of minor junctions or driveways, thereby impacting on dozens of following main road vehicles.

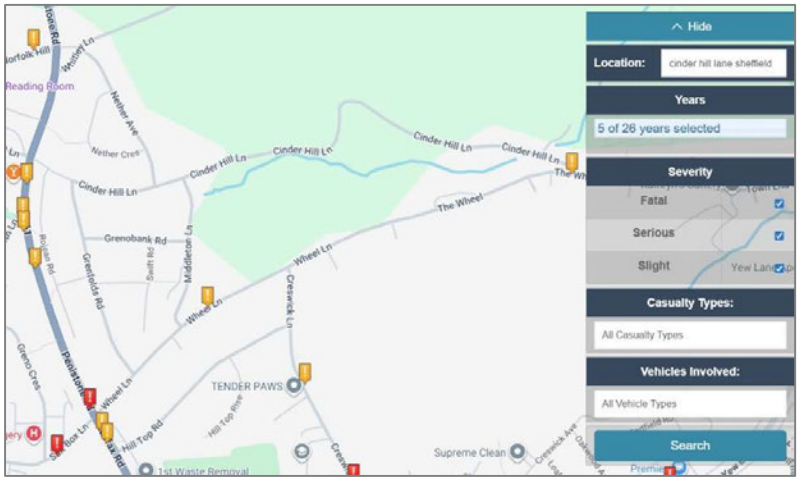
Aprica does not have the software or expertise to challenge TRICS (Trip Rate Information Computer System) and to do so would take many hours. It is therefore beyond the remit of this report but the core issue for Site NES39 seems to be the discrepancy between the theoretical models used by SCC and the likely reality of trip generation and modal transport choice.

The data should be closely checked to ensure its soundness and, if necessary, re-run using data appropriate for busy congested roads with nearby schools and a possible burial ground, such as those around site NES39. As mentioned above, experience has shown that in practice actual trip numbers (especially for private vehicles) are very often higher than those suggested in Transport Assessments (TA's). Software can easily be used to manipulate and 'adjust' modelled outcomes, whereas in real-world circumstances, people's behaviour and choices dictate what actually happens.

TRICS is, in any case, just a library of numbers and predicts trip numbers based on existing, similar, sample sites. It cannot model the cumulative impact of development on, say, nearby major junctions. A full micro-simulation model should be built, using software such as VISSIM ("Verkehr In Städten SIMulationsmodell" - which translates to "Traffic in Cities - Simulation Model") to show actual traffic modelling for the wider area rather than just numbers for the one site. This is particularly important for NES39 as it is very close, and connected by the Inspectors' requirements, to the larger NES37.

6 INJURY COLLISION RECORD

'CrashMap' is a website that uses official government data (the STATS19 database) collected by police forces across the country, to allow users to see where, when, and (for a fee) how road traffic collisions (RTC's) are occurring in their local area. The CrashMap data for the latest verified five-year period (2020 to 2024 inclusive) is shown below. There have been several slight (shown amber) and serious (shown red) injuries in the area of the site and on surrounding roads. In terms of the number of injury collisions, it should be noted that although there is little published data on unreported collisions, the Department for Transport (DfT) suggests that '*for every reported and recorded injury collision there could be as many as 5 unreported injury collisions and 20 damage-only collisions*'. Near misses could be as many as 300 per recorded injury collision.



Injury Collisions - CrashMap

7 OTHER FACTORS TO CONSIDER

The Statement of Common Ground (SOCG) between SCC and Limes Developments agrees that access to NES39 would be provided from Wheel Lane, subject to further technical assessments at the planning stage. Road safety will be addressed through a detailed Transport Assessment, ensuring that access points are designed to protect all users, including pedestrians and cyclists. Future planning applications will promote walking, cycling, and public transport use, in line with local and national policy, to encourage sustainable and accessible travel for new residents.

Residents argue that the development would lead to higher traffic volumes on local roads, raising concerns about congestion and road safety, especially given the area's topography and current rural use, there are reduced opportunities for sustainable travel They feel that SCC has not fully assessed the impact on openness and permanence, which includes considering the effects of increased traffic and changes to travel patterns.

At a Sheffield Plan Examination Hearing in October 2025 the Inspectors discussed the site area, access and highway issues, the site's role in separating Grenoside from Chapeltown (coalescence – see below), and its impact on local character and landscape value. The hearing also addresses open space provision, biodiversity (including effects on the Cinder Hill Brook Local Wildlife Site and the Local Nature Recovery Network), archaeological considerations, infrastructure planning (especially collaboration with NES37), land contamination risks, delivery timescales, and the justification for removing adjoining land from the Green Belt. The outcome of the hearing for site NES39 was that the Inspectors deemed the site to be 'sound' for development, provided that specific 'Main Modifications' are implemented. The Inspectors mandated a reduction in housing capacity and the inclusion of significant landscape buffers to protect the rural character of Grenoside. As mentioned above, they ruled that NES39 must be developed through a unified masterplan with the adjacent site NES37, ensuring that vehicular access and infrastructure are coordinated as a single network rather than fragmented junctions. Whilst the principle of access from Wheel Lane was accepted, the final design must prove it can accommodate necessary visibility splays and provide dedicated pedestrian and cycle permeability into the existing village.

The National Planning Policy Framework (NPPF) and SCC's own Policies resist the coalescence of settlements and Greenbelt land is scored in terms of importance against such sprawl. Residents

argue that developing site NES39, particularly with NES37, would cause coalescence, merging Grenoside into Ecclesfield and Parson Cross.

The Draft Sheffield Plan Green Belt Review – Appraisal of Proposed Additional Site Allocations and Consequential Deletions mentions that the proposed allocation for site NES39 has been reduced in size during the examination process if the site is removed from the Green Belt, the new boundary would be weaker, relying on the woodland edge and a hedgerow. Whilst SCC's own assessment showed that NES39 performs moderately well against the Green Belt purposes, it plays a relatively weak role in preventing the merging of settlements and offers limited opportunities to 'round off' the existing urban edge. Overall, the evidence suggests that NES39 continues to make a valuable contribution to the Green Belt, particularly in protecting the countryside, and its removal would weaken the boundary and reduce this protection.

The Sheffield Plan Proposed Additional Site Allocations document for NES37, the neighbouring site, confirms that development must comply with the above-mentioned 'Golden Rules' of the National Planning Policy Framework; A masterplan is required for NES39 and NES37 together, and must be submitted with any planning application; The site must address flood risk through mitigation measures identified in the Level 2 Strategic Flood Risk Assessment; Development should be coordinated with NES37 (on the opposite side of The Wheel), including a joint infrastructure delivery plan; Additional requirements include a 15 metre buffer to the adjacent ancient woodland, retention of public footpaths, and thorough assessments and mitigation for heritage, archaeology, and potential land contamination.

Air Quality

Site NES39 is situated within the city-wide Sheffield Air Quality Management Area (AQMA), necessitating a comprehensive Air Quality Assessment to address the impact of the estimated 2,000 additional daily vehicle movements. Under current planning policy, the introduction of sensitive receptors, such as the nearby proposed Secondary and SEND educational facilities, within an AQMA requires robust mitigation to ensure compliance with national nitrogen dioxide (NO_2) and particulate matter (PM_{10}) limits. Proposed interventions could include EV charging and 'green' buffer zones. The cumulative impact, however, of this development and NES37 along with other proposed site allocations remains a point of contention. The area's topography could also exacerbate local concentrations of pollutants during peak 'school run' periods. If suitable measures cannot be guaranteed to work, the site should be withdrawn.

8 CONCLUSIONS AND RECOMMENDATIONS

Conclusions

More evidence needs to be provided, bearing in mind the known issues around site NES39, that the proposed access would be safe, connective without leading to rat running, and conducive to sustainable travel. Further development at this location would currently seem inappropriate, based on the known congestion problems. Proposals would need to be compliant with National Planning Policy and are probably not physically deliverable given the available highway widths etc.

Of the 'Four Points' mentioned in Section 3 above, the Inspectors should note the following:

Positively Prepared: The proposals do not currently meet 'objectively assessed development' or 'infrastructure requirements':

- The assessments to date appear to have been rushed in effort to meet SCC's time constraints and seem optimistically in favour of the proposed development, giving little thought to wider and cumulative impact.
- The consultation documents provide no confidence in the TRICS modelling, the impact assessments overall, or that the local highway network would be able to cope with the increase in traffic demand. Neither is there anything to suggest that that local and national policy and objectives, such as active and sustainable travel, could be genuinely achieved.

Justified: The proposals are not based on proportionate evidence:

- The allocation of site NES39 is not currently supported by proportionate or complete transport evidence. The cumulative impact of this and major neighbouring developments such as NES37 and others in an already badly congested area, is concerning.
- TRICS data is questionable and it is possible that the site could generate significantly higher traffic movements, particularly by private car. If TRICS outputs are not based on like-for-like sites the projected sustainable travel figures are likely to be far too optimistic.

Effective: Deliverable over the plan period:

- The site cannot be made safe and sound without major external highway works and even then would be likely to still present additional hazards for vulnerable road users (i.e. those walking, wheeling and cycling), and are unlikely to sufficiently address congestion. It is therefore unlikely that acceptable proposals, in terms of Policy etc, could be delivered within an agreed period, if at all.

Consistent with National Policy: The proposals are not consistent with Policy such as the NPPF.

- The proposals do not offer enough sustainable transport improvements in an area where they are inadequate at present. The topography and constrained widths do not lend themselves to introducing such measures.
- The proposals would have an unacceptable impact on traffic and road safety for the local highway network and its residents.
- In terms of sustainability, walking to and from the site is unlikely due to the unattractive footways, the topography and the significant traffic volumes passing close to those walking. Footways are narrow or non-existent in places. There is no cycle infrastructure at all and no evidence is provided to demonstrate how LTN 1/20-compliant cycle infrastructure could be delivered within the highway limits. Bus services are infrequent and bus stops are not to an acceptable standard. Rail access is impractical.

- Active Travel England (ATE) requires developments to enable at least 50% of short trips by sustainable modes by 2030. There is no likelihood of achieving this.
- The site would, for the above reasons, probably be overwhelmingly car-dependent.

Recommendations

The allocation of Site NES39 should be very carefully assessed to ensure that safe and sustainable travel is a realistic proposition. If no such guarantee can be provided, the site should be removed from the Sheffield Plan due to continuing road safety hazards, unmitigable impact on the highway network, and failure to be able to meet sustainability requirements.

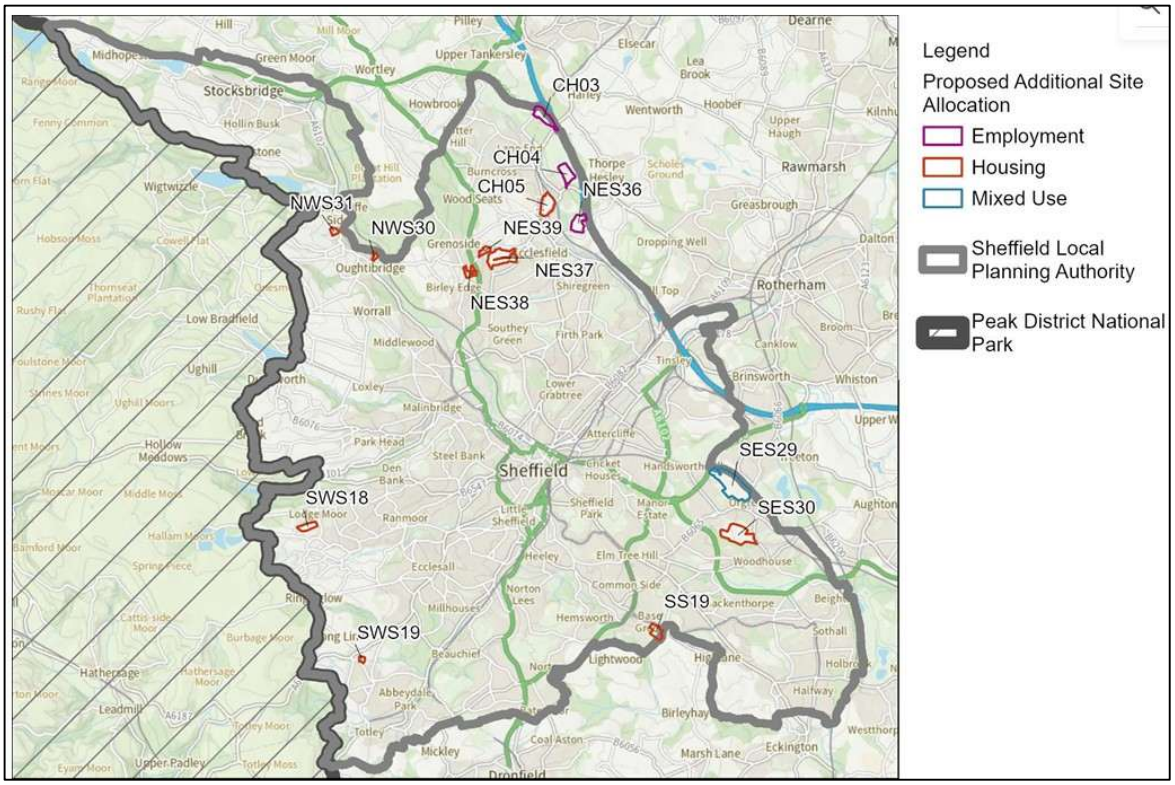
Should any development go ahead, Grampian-style conditions need to be imposed such that no development can commence until the issues of safety, traffic impact, sustainability and other concerns have been fully addressed and the associated works completed. If this is not possible then again the site should not proceed.

If sustainability aims are to be anywhere near successful, a robust Sustainability Strategy must be prepared in order to provide direct, safe walking and cycling links to Grenoside, Ecclesfield and other local facilities via new and improved footways and paths, segregated LTN 1/20-compliant cycle infrastructure, and improved bus frequency with with fully compliant bus stops and shelters (raised bus boarder kerbs, tactile paving, bus stop clearways). These measures should also be enshrined in Grampian-style planning conditions.

More robust and accurate assessment needs to be made of the likely cumulative impact on the wider highway network, capturing realistic site SE39 and NES37 traffic, known existing traffic problems and known committed residential and commercial developments in Grenoside, Ecclesfield, Chapeltown, Thorpe Hesley etc.

“The Sheffield Plan”

Assessment of Cumulative Impact of Sites CH03, CH04, CH05, NES36, NES37, NES38 & NES39 on Ecclesfield, Chapeltown and Grenoside



Map of Sites – SCC

April 2026

1 TERMS OF REFERENCE

Aprica ltd has been commissioned by a local interest group to comment on the highway implications for several proposed 'Sheffield Plan' Greenbelt development sites in and around Ecclesfield, Chapeltown and Grenoside. The sites in question are CH03, CH04, CH05, NES36, NES37, NES38 and NES39, shown on the above map.

The purpose of this summary report is to assess the overall, cumulative, impact of the current proposals for the sites. It is intended that this report be considered by the interest group with a view to submitting a formal response to Sheffield City Council ('SCC'). The report is based on local knowledge, prevailing highway conditions and available documents, illustrative drawings etc. The assessment should be read in conjunction with the individual Transport Statements prepared for each site.

Ian Taylor (I.Eng MICE) has produced this report. Ian is an Incorporated Engineer and a Member of the Institution of Civil Engineers, with thirty-five years' experience of public and private sector highway infrastructure disciplines including transportation planning, RoSPA accredited accident investigation & prevention, traffic management, road safety audits, traffic regulations, and highway design & construction. Ian has led on numerous major highway projects for Local Authorities and has presented at Planning Committees, Council meetings, public meetings and drop-in events, and at Public Inquiry.

2 INTRODUCTION

The scope of this report is to consider the cumulative impact of the proposed 'Main Modifications' for the Sheffield Plan, specifically addressing the dense cluster of residential, general employment, and large-scale logistics allocations proposed across the S35 corridor. The sites concerned comprise CH03, CH04, CH05, NES36, NES37, NES38 and NES39. These sites have been assessed individually and Transport Statements prepared for each. The Assessments can be read in conjunction.

This report is separated into the following parts:

1 Terms of Reference

2 Introduction and Executive Summary

3 Cumulative Impact

4 Hotspot Analysis

5 Flawed Baseline Data and Sustainability Failures

6 Mitigation

7 Recommendations

EXECUTIVE SUMMARY

The individual Transport Statements for these sites, collectively, highlight a local highway network that is not just ‘busy’ but operating at structural breaking point. Whilst individual site promoters might claim their specific allocations only add marginal, manageable traffic, the cumulative reality is an increased state of permanent network stress where the system has lost all residual resilience.

The simultaneous introduction of hundreds of residential commuter vehicles (from sites like NES37, NES38, and CH05) alongside the continuous, 24/7 influx of Heavy Goods Vehicles and commercial vans generated by the 16-hectare logistics hub at NES36, creates an unmitigable conflict. The North Sheffield corridors are fundamentally incapable of absorbing these competing traffic demands without triggering total system failure. Any minor incident, such as a vehicular collision, motorway obstruction, or the daily ‘school run’, will inevitably cascade into area-wide gridlock.

Based on the cumulative evidence, the current approach to the Sheffield Plan in this area is fundamentally unsound. Before any further consideration of these sites takes place, a whole-area micro-simulation model should be commissioned to account for rat running, lifelike driver behaviour and the traffic generation and movement across all the sites. Sites that offer the highest safety risk or zero sustainable travel potential should be considered for removal from the plan. Any development that does progress should be under Grampian-style conditions whereby no works can take place until major strategic junction improvements, such as at the M1 Junction 35, the A61 and the major hot spots on the local network are fully delivered.

3 CUMULATIVE IMPACT

The following matrix demonstrates how the seven sites interact to create local and strategic network (SRN) failure points:

Hotspot Location	Contributing Sites	Nature of Cumulative Impact	Severity Rating
M1 Junction 35 Gateway	CH03, CH04, CH05, NES36	**SRN Failure:** Commuter vehicles and 24/7 heavy logistics (HGV/LGV) queuing onto the M1 mainline; strategic instability.	CRITICAL
Chapeltown Centre & Warren Lane	CH03, NES36	**Commercial Rat-Running:** M1 J35A routing restrictions force westbound industrial traffic through the residential core, clashing with CH03 commuter flow.	CRITICAL
The Ecclesfield "Cross"	NES37, CH05, NES39	**Village Paralysis:** Combined school run and commuter traffic critically exceed historic junction capacities.	SEVERE
Local Lanes (Yew/Wheel/Jumble)	NES36, NES37, NES39	**Safety Erosion:** Major residential and industrial rat-running on semi-rural lanes; severe vehicle/pedestrian conflict.	HIGH
Skew Hill / A61 Corridor	NES38, CH05	**Corridor Saturation:** Total loss of resilience; knock-on of minor isolated delays leading to area-wide gridlock.	HIGH

4 HOTSPOT ANALYSIS

Strategic Road Network (SRN) Failure: M1 Junction 35

The interface between the local network and the M1 is the most critical failure point identified in this assessment.

- **The 'Blocking Back' Risk:** Sites CH03, CH04, and NES36 are located within immediate proximity to the M1. The unprecedented volume of heavy logistics traffic from NES36 will saturate the A629 Cowley Hill/Cowley Way junctions, causing queues to physically extend back onto the M1 slip roads.
- **National Policy Conflict:** National Highways (NH) policy forbids development that causes queuing on the motorway mainline due to the severe risk of high-speed rear-end collisions.
- **HGV/Residential Deadlock:** The continuous 24/7 freight movements from the logistics allocations will compete for the exact same limited road space as the 600+ residential car trips generated by NES37 and CH05, creating a strategic deadlock at the primary gateway to Chapeltown and Ecclesfield.
- **The M1 J35A Layout and the Chapeltown Rat Run:** A critical failure in the Council's strategic modelling is the assumption that the SRN will seamlessly absorb the industrial traffic generated by sites like NES36. This ignores a fundamental geographic reality, that M1 Junction 35A is a restricted junction offering no northbound entry or southbound exit. Consequently, the motorway cannot function as a local bypass for traffic travelling between

the M1 J35 corridor and the A616/Thorncliffe industrial areas. Commercial routing algorithms and natural commuter behaviour will default to the path of least resistance. Instead of undertaking a massive motorway detour, industrial traffic will be structurally forced directly through the residential centre of Chapeltown via Cowley Lane and Lound Side, overwhelmingly burdening the already failing Warren Lane/Thorncliffe Road junction alongside commuter traffic from CH03.

- **The Village Core - The Ecclesfield Cross (A6135/B6087):** The village core serves as a physical funnel for traffic from CH05, NES37, and NES39.
- **The School-Run Multiplier:** Site NES37 includes a new secondary school and SEND provision. This creates a 'peak within a peak', where local residential roads reach 100% capacity exactly when pedestrian activity—specifically vulnerable children—is at its highest.
- **Lack of Physical Width:** The historic nature of the Ecclesfield Cross means there is no residual highway land available to widen junctions or introduce sustainable travel infrastructure. The impact is therefore unmitigable through traditional engineering.
- **Deterioration of Amenity: Traffic Speeds and Residential Rat-Running** As primary arteries (A61 and A629) reach total saturation, driver behaviour will violently shift towards residential relief routes.
- **Inappropriate Use of Rural Lanes:** Warren Lane (CH03) and Yew Lane (NES37/39) are narrow residential roads with topographical constraints. Similarly, the potential utilisation of Jumble Lane or Loicher Lane for NES36 access or routing poses a severe threat. These semi-rural lanes possess narrow carriageways, blind bends, and a complete absence of footways. Forcing 24/7 industrial freight traffic or displaced residential commuters onto these lanes creates an unacceptable collision risk for local residents and vulnerable road users.

5 FLAWED BASELINE DATA & SUSTAINABILITY FAILURES

The Transport Assessments (TAs) justifying these allocations rely on standard TRICS (Trip Rate Information Computer System) database averages. When assessing cumulative impact, this methodology is critically flawed. For commercial sites like NES36, the reliance on traditional 'B8 storage' data completely fails to capture the hyper-intensive reality of a modern logistics hub. It grossly underestimates "last-mile" LGV (van) movements and masks the massive, simultaneous spikes caused by 24/7 shift changeovers violently clashing with the traditional commuter peaks generated by the residential allocations.

The Sheffield Plan mandates sustainable travel, yet the cumulative reality of these sites guarantees absolute car dependency.

The primary public transport link for the NES36/Cowley corridor is the M35 bus, an hourly service with no late-evening or Sunday provision. It is fundamentally incompatible with the 24/7 operational demands of the logistics allocation.

Sites like NES38, NES39, and the Cowley Hill access points feature steep gradients and hostile freight environments that effectively make 'Active Travel' impossible for the average commuter, guaranteeing private car reliance across the entire S35 portfolio.

The M1 Junction 35 corridor is a documented air quality hotspot (2025 Air Quality ASR). The simultaneous development of a major logistics hub alongside the wider S35 housing allocations will introduce thousands of new, daily combustion-engine movements. This cumulative increase in

emissions directly threatens the "Very High" ecological integrity of adjacent Ancient Woodlands (e.g., Smithy Wood and Hesley Wood) through chronic nitrogen deposition, representing a failure to balance economic development with statutory environmental protections.

6 MITIGATION

The campaign group and other residents maintain that the impacts of these seven sites cannot be mitigated. It is a view supported by the evidence given in this assessment and the associated individual Transport Statements. There are many physical and policy barriers. The primary reasons for concern are:

- Zero Residual Capacity: In planning law, if a road is already at 100% capacity, even a small increase is considered ‘severe’ because it triggers total system failure.
- Topographical Mythology: Sites like NES36, NES38 and NES39 feature steep gradients that effectively make ‘Active Travel’ (walking, wheeling and cycling) impossible for the average resident. Consequently, nearly 100% of new residents will be using private cars, further overloading the identified hotspots.
- The Safety Red Line: With the high numbers of recorded injury collisions in the area, any cumulative increase in traffic volume poses an increased threat to public safety.

7 RECOMMENDATIONS

Based on the cumulative evidence, the current approach to the Sheffield Plan in the Ecclesfield, Chapeltown, and Grenoside area is unsound. The following actions are urgently recommended:

- Mandatory Micro-Simulation: Isolated, generic junction modelling must be discarded. The Council must commission a comprehensive, whole-area micro-simulation model (e.g., VISSIM) that simultaneously assesses the ‘busy day’ (85th percentile) impact of all seven sites, explicitly accounting for the J35A routing restrictions, logistics shift-change spikes, and lifelike rat-running behaviour.

- Immediate Review and Removal of Allocations: Sites that offer the highest safety risks, generate unmitigable industrial traffic, or possess zero realistic sustainable travel potential (specifically naming NES36, CH03, and NES39) must be removed from The Sheffield Plan to prevent severe residual network failure.

- Infrastructure-Led Delivery (Grampian Conditions): If any of these allocations are progressed, strict Grampian-style conditions must be legally applied across the S35 corridor, whereby no development can commence until major strategic junction improvements and physical measures preventing commercial rat-running through local lanes are fully funded, delivered, and operational.

Outlook

RE: Sheffield Plan Main Modifications representations

From [redacted]
Date Tue 2026-05-05 4:38 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Hi again [redacted]

Sorry to email at this late stage but the Chapeltown Ecclesfield group are concerned that the MM numbers have not been quoted on the documents. For clarification the cross-references are as follows:

- CH03 (Warren Lane) – MM459
- CH04 (Hesley Wood) - MM460
- CH05 (Strawberry Fields) - MM461
- NES36 (Smithy Wood) - MM350
- NES37 (Townend Farm) - MM351
- NES38 (Holme Lane Far.) - MM352
- NES39 (Wheel Lane/ Middleton Lane) - MM353.

Regards,
Ian

From: SheffieldPlan <sheffieldplan@sheffield.gov.uk>
Sent: 05 May 2026 10:09
To [redacted]
Subject: Sheffield Plan Main Modifications representations

Hi Ian,

Thanks for your message earlier. I just wanted to confirm receipt of all the emails. We will pass the two onto the Inspectors:

Transport Statements and Cumulative Impact Assessment on behalf of the Chapeltown, Ecclesfield and Grenoside Save our Green Belt Community Action Group, (relating to sites CH03, CH04, CH05, NES36, NES37, NES38 and NES39)

Transport Statements and Cumulative Impact Assessment on behalf of the Save S13 Green Belt: The Sapphire McCarthy Campaign Group, (relating to sites SES29 and SES30)

Thanks,

[redacted]

Planning Service - City Futures
Sheffield City Council
Howden House, 1 Union St, Sheffield, S1 2SH
(0114) 273 4634

We offer an integrated planning and building control service
Websites: www.sheffield.gov.uk/planning or www.sheffield.gov.uk/buildingcontrol
Location: 5th Floor Howden House, 1 Union Street, S1 2SH

Apply for planning permission online at: www.planningportal.gov.uk/apply
Apply for building regulation permission online to: buildingcontrol@sheffield.gov.uk
Your email address, and any other personal information you may have shared with us, will only be processed in accordance with the Council's commitment to comply with the UK GDPR.
If you would like further information, please refer to Sheffield City Council's Privacy Notice

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REF5.0211

Outlook

Sheffield Plan Main Modifications Consultation Responses for Sites SE29 and SE30 Handsworth Road Finchwell Road and Beaver Hill Road, S13 - Save S13 Green Belt: The Sapphire McCarthy Campaign Group

From [redacted]
Date Sat 2026-05-02 8:35 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

1 attachment (2 MB)
Sheffield Plan Sites SE29 SE30 Handsworth Sheffield v2.0.pdf;

[redacted]

Good morning,

In advance of the 'Sheffield Plan Main Modifications' consultation closing date of 5pm on 5th May 2026, please find attached a Transport Statement for Sites SE29 and SE30, which I hereby submit on behalf of the **Save S13 Green Belt: The Sapphire McCarthy Campaign Group.**

Should you have any queries please feel free to contact me by email or on the number below.

I should be grateful if you would confirm safe receipt.

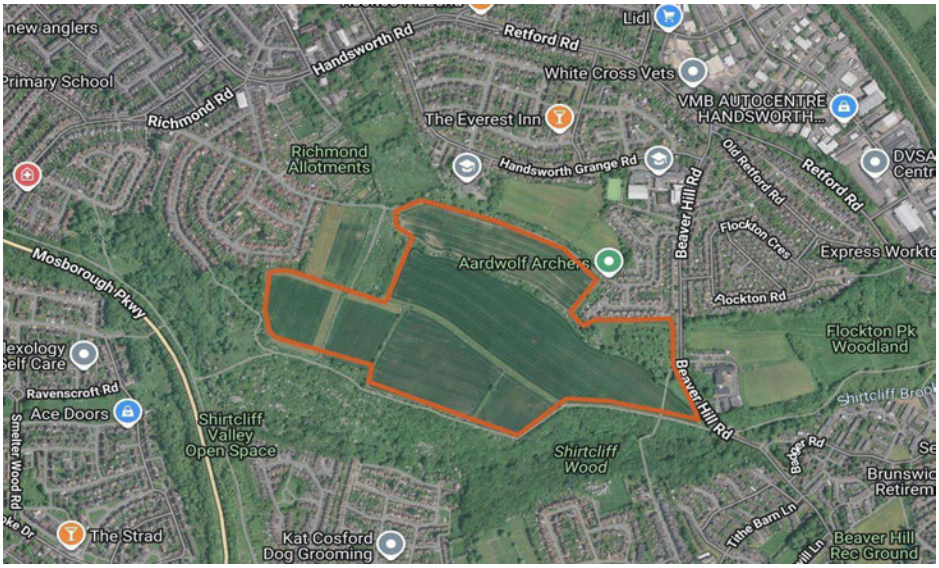
Regards,
Ian Taylor
Aprica ltd
[redacted]

“The Sheffield Plan”

Review of Proposed Sites SES29 and SES30 Handsworth Rd, Finchwell Rd & Beaver Hill Rd, Sheffield S13



SES29 - Handsworth Hall Farm, Finchwell Road, S13 9AS – Google



SES30 - Land between Bramley Lane and Beaver Hill Road, S13 7JH - Google

April 2026

1 TERMS OF REFERENCE

Aprica ltd has been commissioned by the Save S13 Greenbelt campaign to comment on the highway implications of the proposed Main Modifications MM410 and MM411 for sites SES29 '*Handsworth Hall Farm, Land at Finchwell Road, S13 9AS*' and SES30 '*Land between Bramley Lane and Beaver Hill Road, S13 7JH'* hereafter referred to as 'SES29' and 'SES30'. These Greenbelt sites have been identified in the proposed 'Sheffield Plan' ('the Plan') consultation documents as potential sites for mixed use (SES29) and housing (SES30) developments.

The purpose of this report is to assess the transport and traffic implications of the current proposals. It is intended that this report be considered by the campaign group with a view to submitting a formal response to Sheffield City Council ('SCC'). The report is based on local knowledge, prevailing highway conditions and available documents, illustrative drawings etc.

Ian Taylor (I.Eng MICE) has produced this report. Ian is an Incorporated Engineer and a Member of the Institution of Civil Engineers, with thirty-five years' experience of public and private sector highway infrastructure disciplines including transportation planning, RoSPA accredited accident investigation & prevention, traffic management, road safety audits, traffic regulations, and highway design & construction. Ian has led on numerous major highway projects for Local Authorities and has presented at Planning Committees, Council meetings, public meetings and drop-in events, and at Public Inquiry.

2 INTRODUCTION

The scope of this report is to consider the proposed 'Main Modifications' to the Sheffield Plan (the Plan), for Site SES29: 56.40 hectares of Greenbelt land earmarked for mixed use of 870 homes and 20 hectares of employment space, and Site SES30: 35.28 hectares of Greenbelt land earmarked for the construction of 827 homes, a secondary school, and a multi-faith burial ground. The two sites lie around 1km apart by road. The intention is to offer expert commentary on the sites' safe and practical useability by the travelling public, the impact on the highway network and the possible cumulative effects of both sites being developed.

For ease of reference this report is separated into the following parts:

1 Terms of Reference

2 Introduction and Executive Summary

3 Background

4 Sheffield City Council and Other Documentation

5 Assessment of Highway Proposals

6 Sustainability

7 Injury Collision Record

8 Other Factors to Consider

9 Cumulative Impact

10 Conclusions and Recommendations

EXECUTIVE SUMMARY

This report, commissioned by the Save S13 Greenbelt campaign, reviews the transport and highway implications of the Sheffield Plan proposed Main Modifications MM410 (SES29: Handsworth Hall Farm/Finchwell Road) and MM411 (SES30: land between Bramley Lane and Beaver Hill Road), and the cumulative effect of developing both sites.

The evidence currently available does not demonstrate that the local road network in the vicinity of these proposed Greenbelt allocations can accommodate additional trips safely and efficiently, nor that Active Travel England's LTN 1/20 expectations for sustainable travel can be met. It is recommended that SES29 and SES30 not be taken forward unless and until robust evidence and a fully funded, deliverable mitigation and sustainable transport package is secured.

Key risks result from:

- Existing congestion on a constrained network - regular queuing and unreliable journeys on the B6066/B6200 corridors, with limited scope for capacity improvements.
- Mitigation risk - proposed signalisation at Retford Road/Beaver Hill Road sits very close to the new Lidl signals, increasing 'blocking back' risk and leaving significant residual queues.
- High likelihood of car-dependency - settlement-edge locations severed by busy B-roads make mode shift difficult without high-quality comprehensive alternatives.
- Active travel deliverability - achieving LTN 1/20-compliant routes (including segregation where needed) is uncertain within current highway constraints and steep gradients (notably Beaver Hill Road).
- Trip generation uncertainty - TRICS inputs/mode shares may be optimistic. If understated, impacts on already stressed junctions and corridors could be made materially worse.
- Road safety and severance - recorded injury collisions (2020–2024) include serious/fatal outcomes. More traffic and crossings increase exposure and risk of conflict.

Together the sites could add around 1700 homes, employment land, a secondary school and a burial ground onto the same constrained corridors. The report finds limited evidence that cumulative impacts alongside other committed/emerging development have been robustly tested.

As a minimum the proposals require:

- Robust trip generation testing using appropriate TRICS sample site inputs plus sensitivity tests, appropriate to congested, car-dominant corridors.
- Cumulative dynamic modelling (such as VISSIM micro-simulation) covering both sites, the closely spaced signals, school peaks and committed development in the wider area.
- A deliverable sustainable transport package meeting ATE expectations and LTN 1/20 standards, secured early, not left as aspiration.
- Enforceable phasing/conditions including Grampian-style conditions so that mitigation and safety measures are delivered before development proceeds.

Conclusion

If the above evidence and measures cannot be secured and introduced, the report's position is that SES29 and SES30 should be removed from the Sheffield Plan.

3 BACKGROUND

Planning Inspectors have considered the 'Sheffield Plan' (the Plan) proposals under a number of stages of the Planning process including 'Regulation 19' of The Town and Country Planning (Local Planning) (England) Regulations 2012. Regulation 19 focused on four main tests of soundness, namely **Positively Prepared:** Based on a strategy that seeks to meet objectively assessed development and infrastructure requirements; **Justified:** Based on proportionate evidence; **Effective:** Deliverable over the plan period; **Consistent with National Policy** (such as the National Planning Policy Framework (NPPF). The Inspectors now consider the Plan to be 'sound and legally compliant subject to main modifications being agreed and made'. The Inspectors will essentially seek to determine whether adding a site or sites, such as SES29 and SES30, makes the plan 'sound' (by meeting employment needs etc), or 'not sound' by creating unmitigable traffic issues. The modifications must still undergo detailed transport assessment, sustainability appraisal, habitats assessment, and public consultation and it can still be argued that the four main tests of soundness have not been satisfied because the proposed Main Modifications fail to resolve the infrastructure and highway safety issues identified during the examination.

The proposals still lack detail on matters such as access design, precise number of houses (since MM223 makes all numbers "indicative" and are neither minimums or maximums), number of people employed, and acceptable likely trip data (see below under TRICS), which makes it difficult for Inspectors to make a final decision, and for consultees to offer fully considered responses. Neither is there sufficient mention, or demonstrable evidence, of the possible cumulative effect of the addition of the proposed Greenbelt sites to the many other committed and ongoing developments in and around Handsworth, for example the new Lidl store immediately between the two sites, the expanding Advance Manufacturing Park (AMP) at Highfield Spring, the Waverley housing development, and the nearby SES28 allocation on Beighton Road. It does not seem that the overall traffic impacts of these and other developments have been sufficiently considered in the individual site assessments for the Sheffield Plan, or as a whole.

Whilst it must be accepted that building on some Greenbelt land might offer more variety and choice of homes, along with local employment opportunities, this should only be considered over Brownfield/urban development where it can be achieved without significant impact at the proposed sites and in the wider area. More detail needs to be provided on, and more consideration given to, the impact on the existing local road network and how any proposals taken forward could be mitigated to eliminate or sufficiently reduce adverse effects. Should it not be possible to reduce adverse impacts to acceptable levels, sites should be withdrawn and alternatives sought.

Because the sites are greenbelt sites the Inspectors require proposals to meet the 'Golden Rules' of the National Planning Policy Framework (NPPF). The Golden Rules state that for greenbelt release, sites must deliver 50% affordable housing, the upfront provision of necessary local infrastructure and the creation of enhanced, publicly accessible green spaces. This means that the developer must prove that they can mitigate the impact on local roads and provide the required improvement measures, preferably pre-commencement rather than pre-occupation to avoid construction traffic adding to the existing traffic problems. For the area in question this is likely to mean more local signalisation of junctions, improvements to the Strategic Road Network (SRN) and other infrastructure changes. Significant active travel measures will also be required.

4 SHEFFIELD CITY COUNCIL AND OTHER DOCUMENTATION

SCC and their consulting partners AECOM say that: '*Handsworth Hall Farm (SES29) is highly accessible by public and active transport, although development at these locations would still add pressure to already congested local roads at peak times*.' Highly accessible by active transport is disputed. There is more on this matter under Sustainability below. Their reports go on to state that '*the sites at Handsworth (SES29, SES30) are characterised by fairly sensitive landscapes where development would reduce openness and alter landscape function, with complete mitigation difficult to achieve*.' This, on the other hand, is not disputed.

The Integrated Impact Assessment confirms that '*The local road network is known to be highly congested during peak hours, with development likely to add further pressure*.' It then concludes that '*this strategic location would generate "moderate positive effects" in transport terms'*. The document therefore recognises serious current and future congestion, while still reaching an overall positive conclusion on transport and accessibility, a contradiction.

MM410 - Main Modifications for proposed Site Allocation SES29 outlines that: '*Vehicular access requires further transport assessment and detailed transport modelling to ensure safe and efficient operation; the masterplan must integrate with surrounding road infrastructure while minimising impacts on existing communities; junction improvements are required at the Retford Road/Beaver Hill Road junction and contributions may be required for additional improvements at other strategic or local highway junctions; Development must demonstrate that the local and strategic road network can accommodate additional trips safely and efficiently; The site lies within 200 metres of a road with traffic flows exceeding 19,000 trips per day, increasing sensitivity to pedestrian and cyclist safety - safe vehicle, pedestrian, and cycle access arrangements must be demonstrated at the planning application stage; any existing public footpaths or permissive routes crossing the site must be retained, protected, and safely integrated into the layout; The layout must provide and prioritise safe pedestrian and cycle connections within the site and to surrounding neighbourhoods; The masterplan should encourage modal shift away from private car use, particularly in relation to the scale of housing and employment proposed; The site must safeguard opportunities for a new railway station, allowing space for station access, pedestrian and cycle links across the rail line and potential car parking and ancillary infrastructure - financial contributions towards a new station may be required; Ensure that the scale of residential and employment development does not compromise highway safety, is supported by appropriate transport infrastructure improvements and encourages safe, sustainable, and multimodal travel choices*'. All these are valid points and are discussed later in this report but should be thoroughly assessed by the Inspectors and SCC if the development goes ahead. If there is any doubt about them, the site should be withdrawn from the Sheffield Plan.

MM 411, Main Modifications for proposed Site Allocation for site SES30, states that: '*Access to the site via Beaver Hill Road will be subject to further transport assessment; Improvements to the Retford Road/Beaver Hill Road junction are required; Additional developer contributions may be required for highway improvements at other strategic and local network junctions, reflecting the cumulative traffic impact of up to 827 new homes; Any changes to the highway network must be supported by transport assessments; The scale of residential development is expected to generate significant additional traffic which must be mitigated across local roads and the wider strategic network, not just immediate access points; Highway design and improvements must ensure safe access and egress for all users, including vehicles, pedestrians and cyclists; Existing*

public footpaths and permissive paths crossing the site must be retained and protected, helping to avoid conflict between vehicles and non-motorised users; Masterplanning must account for land stability and public safety risks, including those arising from historic coal mining, which could affect road construction and safety; Protection and integration of existing footpaths supports walking and sustainable travel - the Masterplan is expected to support connectivity with surrounding areas, encouraging walking and cycling rather than reliance on private cars; Safeguarded land for a secondary school within the site highlights the need for safe walking and cycling routes for pupils, through careful traffic management to mitigate school-related peak-hour congestion, and future transport planning should address school travel patterns, including potential for sustainable school travel plans'. Again these valid points are discussed later in this report but should be thoroughly assessed by the Inspectors and SCC. If there is any doubt about them, the site should be withdrawn from the Sheffield Plan.

The Transport Assessment: Report on Local Road Networks says that: 'The A630 Sheffield Parkway/B6200 Handsworth Road, once reverted to the standard layout, is found to be within capacity and does not require mitigation; The Retford Road/Beaver Hill Road junction is forecast to experience significant congestion, especially in the PM peak, with capacity exceeding 150% in the 2039 Local Plan scenario - the main issue is a large increase in right-turning traffic from Retford Road to Beaver Hill Road – proposed mitigation resolves the issue and comprises full signalisation of all arms of the junction, a dedicated right-turn bay and retention of the left-turn lane for westbound traffic, existing pedestrian crossings retained with potential for additional facilities and possible bus priority measures; Ongoing monitoring is recommended as development sites come forward'. These assertions are discussed later in the report.

The National Planning Policy Framework (NPPF) and SCC's own Policies resist the coalescence of settlements, to guard Greenbelt land against urban sprawl. It is suggested that developing these two large sites would add significantly to such sprawl and would coalesce development.

Sheffield Online, in December 2025, ran an article on residents' concerns about severe traffic congestion and unsafe parking caused by school drop-off and pick-up times for Handsworth Grange Academy and Ballifield Primary School. They said that '*the narrow road becomes chaotic at school times, with cars parking on zig-zags, pavements, grass verges and even private driveways. This blocks access for residents including disabled people, damages verges and often leads to arguments and unsafe situations. Despite repeated reports to the police, the schools, and Sheffield City Council, locals feel that no effective action has been taken. They are calling for stronger enforcement and better management to improve safety for children, parents, and residents'*. This seems to strongly contradict SCC's position on local roads being within capacity and not requiring mitigation. There is other evidence, later in this report, to suggest that the actual situation on the local highway network is not working as well as SCC suggests, and indeed would be made far worse by further development.

5 ASSESSMENT OF HIGHWAY PROPOSALS FOR SITES SES29 and SES30

Sites SES29 and SES30 Immediate Highway Network

The two sites both lie on the busy B6066, just 1km apart and on either side of the even busier B6200 Retford Road. The layout forms what is effectively a large staggered B-road crossroads.

Indicative Access Arrangements have been provided for both sites but in the absence of further detail and further assessment of trip data etc, it is difficult to comment at this stage. It is, however, very likely that the access proposals will change.



Indicative Access SES29 – Savills EXAM179



Illustrative Concept Plan SES30 – EXAM168

Between the two sites there is a new Lidl (opened in December 2025), at the junction of Rotherham Road and Retford Road. New traffic signals were installed at that junction, in an effort to reduce the effect of all the additional traffic. Evidence suggests that the signals have not helped sufficiently. Residents state that traffic queues often reach all the way up Handsworth Road to St. Mary's Church, with a former 2 to 3 minute journey now taking 10 to 15 minutes.



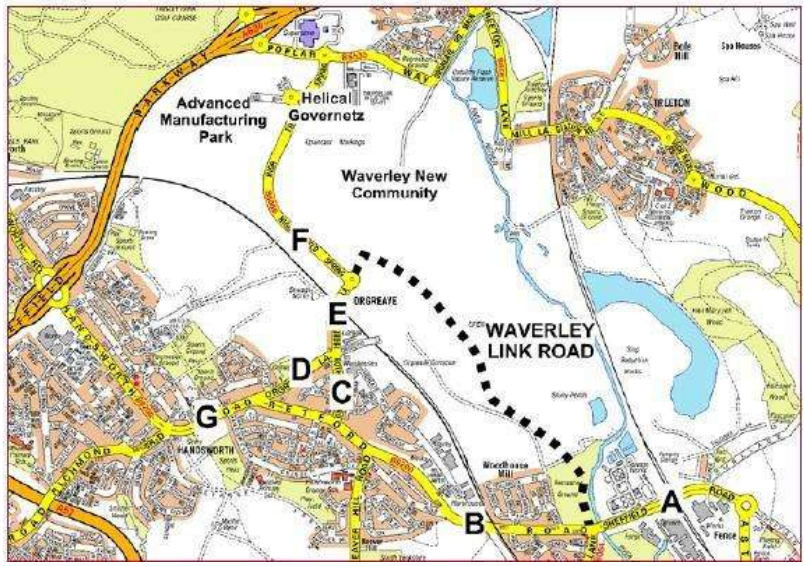
Looking East from Orgreave Lane Towards Lidl,
Queue Length Over 400m – Local Resident Photo



Part of Queue from St Mary's Church To Lidl,
Queue Length Approximately 800m – Local Resident Photo

In addition to the Lidl, also between the two sites, are Handsworth Grange Community Sports College, exits from the large Ballifield housing estate, a One Stop supermarket, the vast Dore House Industrial Estate, Flockton Park Football Ground and Woodland Park, and South Yorkshire Fire and Rescue's Training Centre. All add to congestion around the B6066/B6200 junction.

Just a few hundred metres further afield are the Handsworth Medical Practice, Ballifield Primary School, the large Poplar Way industrial/commercial site and adjacent Waverley Housing Estate. To the south is the centre of Woodhouse. Together, these facilities attract significant traffic numbers to the area of and around the B6066/B6200. The growing Waverley Estate currently has around 1800 dwellings, the overall capacity being around 4000. Since, technically, the estate falls within the Rotherham (RMBC) area it appears to have been overlooked in SCC's assessments of impact. Mitigation was planned, many years ago (around 2010) for the impact of the Waverley Estate, in the form of the 'Waverley Link Road'. Despite traffic figures being assessed from a 2007 baseline to predicted over-capacity figures of up to 139% for Handsworth Road the link road has never been built, allegedly due to a dispute between RMBC and SCC.



Screenshot of Proposed Waverley Link – RMBC Leaflet 2010

It is noted that a new school is proposed as part of the SES30 Schedule of Proposed Main Modifications. This too would add to congestion, particularly at 'school run' times.

The proposed mitigation for SES29 and SES30 is to install traffic signals at the junction of the B6200 Retford Road and the B6066 Beaver Hill Road. This hardly seems proportionate to the known problems and strong evidence of the severe traffic problems that already exist. Alternatives, such as a roundabout, have not been possible even to explore due to the constrained highway boundaries. This is likely to be the case for other measures such as sustainable travel incentives (discussed below). Furthermore the proposed signals would be just 200 metres from those installed in December 2025 for the new Lidl supermarket. This would leave space between the signals installations for around 25 stationary vehicles (a mix of HGV/LGV/car/motorcycle) or as few as 10 slow moving vehicles. The Traffic Assessment (TA) modelling predicts, even with mitigation, a PM peak queue of 52 car lengths. This would clearly leave traffic queuing between and through the signals, blocking Rotherham Road.

On-street and verge parking is commonplace on all of the local roads, further impeding the flow of through-traffic, particularly buses and HGV's, and arguably affecting road safety for users such as cyclists or crossing pedestrians.



Overspill Parking, SY Fire & Rescue Training Centre – Resident Photo

Wider Highway Network

In terms of the Strategic Road Network (SRN), the A630 Sheffield Parkway, one of the most critical arterial routes in the region, is less than 2km away. The Handsworth Road junction is the B6200/B6066, taking traffic directly to and from the Parkway, straight through the area in question. Traffic also accesses and egresses the A630 via Poplar Way, again a route through the area of concern, to Woodhouse, Beighton and Crystal Peaks shopping centre. Handsworth Grange Road is already a notorious 'rat-run' between Beaver Hill Road/Handsworth Road and The Parkway and city centre, as shown in the photo below.



Handsworth Grange Road – Resident Photo

6 SUSTAINABILITY

In the UK, standards for sustainable travel and the hierarchy of travel modes are set by the Department for Transport's (DfT's) Manual for Streets (MfS) and Local Transport Note 1/20 (LTN 1/20). The DfT publishes the National Planning Policy Framework (NPPF). Paragraph 114 explicitly states that applications should "give priority first to pedestrian and cycle movements." The MfS is the go-to guide for urban design. It established the hierarchy that places pedestrians at the top and private cars at the bottom.

Active Travel England (ATE) is the government's Sustainable Travel Inspectorate. It reviews large planning applications (such as SES29 and SES30) to ensure that they meet these standards. If a site is too 'car-dependent' ATE can formally object. They are concerned that these sites are each at the edge of the 'settlement', and are severed by the B6200 and B6066. ATE are not content with simple footway measures or shared use cycle markings etc, they require prioritised measures for pedestrians and fully segregated cycle facilities, not just within and to and from the nearby highway but to the proposed Waverley Railway Station and the wider area. There is no Active Travel Check at present and therefore the proposals do not meet ATE's published national standards.

The South Yorkshire Mayoral Combined Authority (SYMCA) has been mandated by the DfT that all local transport authorities are required to review and update their statutory Local Transport Plans (LTP's) to align with current national and local priorities, and to provide a more consistent basis for determining future investment priorities. 'Connecting Sheffield' is part of the long-term vision for the future of travel in the city of Sheffield, creating high-quality, convenient and safer routes into and around the city for cycling, walking and public transport. Funding has been made available, from central Government and other sources, to deliver work that aims to transform the city and enable people to make better travel choices. The website https://haveyoursay.sheffield.gov.uk/connecting-sheffield gives updates on projects. It is suggested that the proposed allocations for SES29 and SES30 are inconsistent with the 'Connecting Sheffield' strategic framework, in that the framework mandates a 'mode-shift first' approach to all major growth areas. Whilst the emerging Local Plan (via MM410 and MM411) identifies the need for active travel and mass transit integration, these requirements remain aspirational rather than secured and lack a committed delivery timeline within the Infrastructure Delivery Plan (IDP).

For sites SS29 and SES30 the hierarchy of travel modes – 1. Walking, 2. Cycling & wheeling, 3. Public transport, 4. Private car – needs much more consideration, more detail provided on how active and sustainable travel can genuinely be achieved, and more comfort that the measures would be guaranteed to be delivered prior to development.

The TA: Public Transport & Active Travel and Appendix cites improvements to bus stops, good connections to the proposed railway station, and better connectivity and sustainable transport options for the local community'. This is very ambitious and even if it could be delivered, the fact remains that the local highways are unattractive to pedestrians and cyclists, and are divided by busy, noisy and air-polluted B roads.

Sustainable Travel Modes

1. Walking: The local footways between and around sites SES29 and SES30 are not overly wide but have scope to be widened by the removal of grass verges and clearance of foliage. Notwithstanding, they are bordered along their entire lengths by busy B roads with heavy traffic, noise and poor air quality. To encourage people to walk requires much more than wide continuous footways. The environment and local topography would be a strong limiting factor in people choosing to walk. Beaver Hill Road, for example, is particularly steep. ATE's recommended maximum gradient is 1 in 20 (5%). Beaver Hill Road is typically at least 1 in 14 (~7%) and in places 1 in 7 (~14%) which is over ATE's 'critical' maximum of 8%.

2. Cycling: As above, ATE's recommended gradients are far exceeded on Beaver Hill Road. Furthermore to introduce cycling infrastructure to LTN 1/20 standards would be difficult if not impossible. Constrained highway widths and heavy volumes of traffic would be sure to deter all but the most serious of cyclists.

3. Public Transport: Bus services in the area are regular it seems, but buses can be held up amongst all the other congestion, particularly during the school run period. Not all the bus stops are to current standards, which require raised bus boarder kerbs, tactile paving for partially sighted users, bus stop clearway markings, and preferably shelters unless the stops are 'alighting only'. There would need to be bus stop provision within the developments to make bus travel attractive and to bring bus stops within the widely accepted 400 metre maximum walk away.

The nearest railway station to the sites, currently, is the Woodhouse Station, some 1.5km or so away. This is close to or beyond (adding possible walking distances within the sites) ATE's 'last mile'. There have been long-discussed proposals for a station at Waverley and it is mentioned in the Sheffield Plan proposals, but according to Network Rail "*the project remains in the development phase, timescales are under review and no formal milestones or delivery timetable have been finalised*". That is: it is still only in discussion and is by no means a certainty. Even if this new station were built it would be a minimum 1.25km from the closest point of SES30, and 1.7km from its furthest point, making Woodhouse station still the more practical station.

4. Private Car: In the absence of guaranteed, suitable and attractive sustainable travel modes, the car is highly likely to be the main mode of transport for people living in or visiting the houses on the proposed sites.

Trip Generation and TRICS

TRICS is the 'Trip Rate Information Computer System'. It is effectively an industry-standard historical library of traffic figures. When developers want to build something new – such as housing or commercial space – they must demonstrate how much extra traffic the development will put on the highway network. Because the development doesn't yet exist the developer uses TRICS and its database to assess and demonstrate what has happened at similar sites in the past.

Whilst TRICS contains thousands of real-world traffic counts from across the UK and Ireland, its outputs have been controversial for the Sheffield Plan assessments. ATE has challenged TRICS

numbers on the grounds of sites not being as sustainable as the 'test' sites (with major tram and bus hubs etc) do not reflect the reality of the sites under consideration. Developers naturally want to demonstrate the minimum impact on the highway network and might therefore cherry pick test sites. Critics argue that Planners should design for a typical busy day (called the 85th percentile), whilst Developers prefer to use the average day (the mean) which makes the impact look smaller. Thus, in real-world terms actual traffic volumes and impacts are very often significantly worse than those modelled. Driver and other road user behaviour in 'the real world' is not like a computer model in any case. A common example would be where drivers stop in long lines of slow-moving main road traffic to let single vehicles in or out of minor junctions or driveways, thereby impacting on dozens of following main road vehicles. Sites SES29 and particularly SES30 will be severely affected by 'the school run' on B roads, so not a typical (average) am or pm peak. In terms of the proposed burial ground it is not known whether or not there are any comparable housing/burial ground TRICS examples, and therefore output data could suggest lower traffic figures than would be the case.

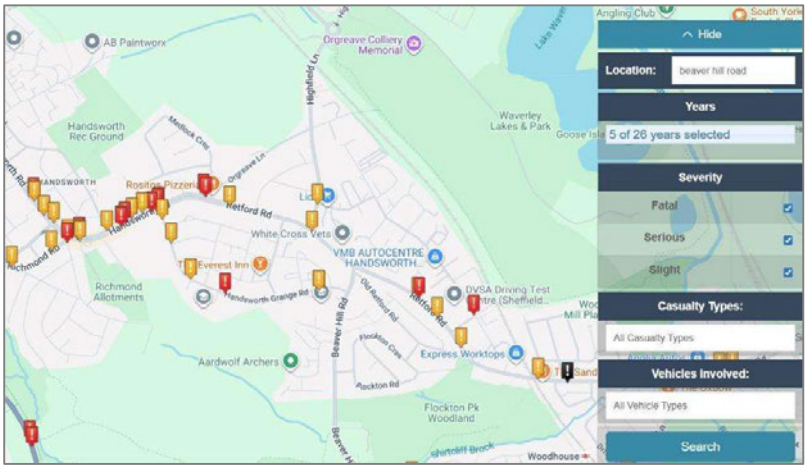
Aprica does not have the software or expertise to challenge TRICS and to do so would take many hours. It is therefore beyond the remit of this report but the core issue seems to be the discrepancy between the theoretical model used by SCC and the likely reality of modal transport choice.

The data should be closely checked to ensure its soundness and, if necessary, re-run using data appropriate for busy, congested, vehicle-dominant roads such as those around sites SES29 and SES30. As mentioned above, experience has shown that in practice actual trip numbers (especially for private vehicles) are very often higher than those suggested in Transport Assessments (TA's). Software can easily be used to manipulate and 'adjust' modelled outcomes, whereas in real-world circumstances, people's behaviour and choices dictate what actually happens.

7 INJURY COLLISION RECORD

'CrashMap' is a website that uses official government data (the STATS19 database) collected by police forces across the country, to allow users to see where, when, and (for a fee) how road traffic collisions (RTC's) are occurring in their local area.

For the latest verified five-year period (2020 to 2024 inclusive) CrashMap shows a high number of injury collisions in the area, particularly on Handsworth Road/Retford Road, several of which resulted in serious injuries and a fatality. In terms of the number of injury collisions, it should be noted that although there is little published data on unreported collisions, the Department for Transport (DfT) suggests that '*for every reported and recorded injury collision there could be as many as 5 unreported injury collisions and 20 damage-only collisions*'. Near misses could be as many as 300 per recorded injury collision.



Injury Collisions in the Area Around Sites SES29 and SES30 - CrashMap

8 OTHER FACTORS TO CONSIDER

Handsworth Hall Farm is within 250 metres of a historic landfill area and near Environment Agency waste permit sites. Development would therefore involves remediation.

Bramley Lane is of archaeological interest including cropmark features. Current activity includes archaeological trenching and surveys to ensure that historical assets are protected before development takes place. SCC confirms that '*Development would reduce openness and alter landscape function, with complete mitigation difficult to achieve*'.

The B6066 between Handsworth and Woodhouse is prone to flooding. The culvert beneath the road often blocks, or lacks sufficient capacity to accommodate flows from the watercourse on SES30 and Shirtcliffe Brook, causing the road to flood and cutting off access to Woodhouse.



Flooding on Beaver Hill Road – Resident Photo



Flooding on Beaver Hill Road near the Proposed Access to SES30 – Resident Photo

9 POTENTIAL CUMULATIVE IMPACT OF BOTH SITES BEING DEVELOPED

Together, the two sites SES29 and SES30 would provide around 1700 new homes, a secondary school, a burial ground and significant employment space. Adding the likely volumes of traffic associated with these proposed developments, and the additional 2,200 homes at Waverley yet to be built, to the traffic already using the B6066, B6020 and other local and distributor roads would increase the existing, known and proven, traffic problems in the area. The wider highway network already struggles because of significant levels of local and commuter traffic, and heavy vehicles associated with the existing commercial sites. The issues affect local roads as well as the A630 Sheffield Parkway, A57 Aston Bypass and the M1 Motorway.

The individual Transport Assessments (TA's) for these sites are already in question over their accuracy, due to the alleged cherry-picking of sample sites to make outputs look more favourable for the developers. Moreover, there is very little to offer confidence that the cumulative impacts have been given due consideration and proposed mitigation. Some of the wider proposals for mitigation are just 'ideas' with no secure funding. Without significant investment in sustainable measures and traffic interventions to reduce current levels of congestion and car-dependency, things could only get worse if the sites were developed, particularly if both sites successfully go through planning.

Safety concerns on local roads would again be exacerbated by additional traffic, most likely to be made up of private cars. Pedestrian severance, by the B6020 and B6066, would remain whatever measures were introduced. The same goes for cyclists, who would arguably be even more poorly accommodated than pedestrians since suitable cycle measures would be more difficult to introduce, if not impossible. Adding multiple controlled crossings, to attract pedestrians, would no doubt slow down traffic, leading to even more congestion. School parking is already causing chaos at school run times and providing another school would only add to these school-related issues.

There is conflicting argument in SCC's assessments, in that on the one hand they state that the sites have been selected based on manageable traffic issues, yet the Transport Assessment suggests that problems will not be solved, or will worsen.

Given the strong evidence of significant local constraints affecting both sites, development of either site, or both together, is likely to create further highway impacts that cannot be satisfactorily mitigated. Each site has separate yet similar issues, such as severance and the lack of opportunity to address their unattractiveness for sustainable travel. To consider delivering both, in such close proximity such that they would create compounded issues, seems completely inappropriate.

10 CONCLUSIONS AND RECOMMENDATIONS

Conclusions

There is strong evidence that significant traffic issues exist throughout the area of the two sites, SES29 and SES30. SCC has stated that the likely further significant impact requires mitigation. A sufficient level of mitigation, to address traffic capacity issues, congestion, severance and sustainable travel, seems highly unlikely if not impossible.

The TRICS modelling is questionable and it has been suggested that sample sites have been cherry-picked to show much lower traffic impact and higher likelihood of sustainable travel. The cumulative, further-reaching impacts have been largely overlooked and in any case TRICS is not necessarily the right tool for the job. A full area-wide model, produced via 'dynamic simulation' would be more appropriate and is in any case the next logical step.

Road safety is a proven concern in the area and any proposals should be scrutinised under the Road Safety Audit (RSA) process. The RSA is separated into 4 parts: Stage 1 - Completion of Preliminary Design; Stage 2 - Completion of Detailed Design; Stage 3 - Completion of Construction; Stage 4 - Post Opening Monitoring 12 months after opening.

Of the 'Four Tests' mentioned in Section 3 above, the Inspectors should note the following:

Positively Prepared: The proposals do not currently meet 'objectively assessed development' or 'infrastructure requirements':

- The assessments appear to have been rushed in effort to meet SCC's deadlines and seem optimistically in favour of the proposed developments.
- The Strategic Highway Network (SRN) seems to have been prioritised over the local network's already significant traffic and safety issues.
- The consultation documents provide no confidence that the local highway network would be able to cope with the increase in traffic demand. Neither is there anything to offer confidence that local and national policy and objectives, such as active and sustainable travel, could be achieved.

Justified: The proposals are not based on proportionate evidence:

- The allocation of sites SES29 and SES30 are not currently supported by proportionate or complete transport evidence. The cumulative impacts of the sites, alongside major neighbouring developments in an already badly congested area, is concerning. TRICS data

is questionable and it is possible that the sites would generate significantly higher traffic movements, particularly by private car.

- If TRICS outputs are not based on like-for-like sites the projected sustainable travel figures are likely to be far too optimistic. A full micro-simulation model now needs to be built in any case, using software such as VISSIM ("Verkehr In Städten SIMulationsmodell" - which translates to "Traffic in Cities - Simulation Model") to show actual traffic modelling rather than just numbers.

Effective: Deliverable over the plan period:

- The sites cannot be made safe and sound without major external highway works and even then would be likely to still present additional hazards and congestion, compounding existing known traffic problems. It is therefore unlikely that acceptable proposals, in terms of Policy etc, could be delivered within an agreed period, if at all.

Consistent with National Policy: The proposals are not consistent with Policy such as the NPPF.

- The proposals do not offer viable sustainable transport improvements in an area where they are inadequate at present.
- The proposals would have an unacceptable impact on traffic and road safety for the local highway network and its residents.
- In terms of sustainability, walking to and from the sites is unlikely due to the unattractive footways where significant traffic volumes pass close-by to those on foot. There is no cycle infrastructure at all and no evidence is provided to demonstrate how LTN 1/20-compliant cycle infrastructure could be delivered within the existing highway boundaries.
- Bus services are not infrequent but not all bus stops are to an acceptable standard.
- Rail access is currently impractical at 1.5km away. The new proposed Waverley Station, if built, would be a minimum of 1.25km away (up to 1.7km from its furthest point). Woodhouse Station would therefore remain the closest station for many, leaving rail travel impractical and unattractive.
- Active Travel England (ATE) requires developments to enable at least 50% of short trips by sustainable modes by 2030. There is no likelihood of this being achieved.
- The sites would, as things stand, be overwhelmingly car-dependent adding unacceptably to the known issues that already exist in the area.
- The current mitigation proposals seem reactive rather than proactive.

Recommendations

An area-wide traffic simulation model now needs to be produced to show dynamic simulation of traffic movement. A VISSIM micro-simulation might be appropriate.

The allocation of sites SES29 and SES30 should be very carefully assessed for safe and sustainable travel to be a completely realistic proposition. If no such proof can be provided, the sites should be removed from the Sheffield Plan due to likely road safety hazards, unmitigable constraints on the local highway network, and failure to be able to meet sustainability requirements.

Should any development go ahead, Grampian-style Conditions need to be imposed such that no development can commence until the issues of safety, traffic impact, sustainability and other

concerns have been fully addressed and works completed, including suitable measures in the wider local highway network area. If this is not possible the site should not proceed.

If sustainability aims are to be anywhere near successful, a robust Sustainability Strategy must be prepared in order to provide direct safe walking and cycling links not just to locations around the sites (schools, supermarkets, shops, medical facilities and commuter destinations etc) but in the wider areas of Handsworth, Woodhouse and the proposed railway station. Such measures need to be LTN 1/20-compliant (fully segregated cycle infrastructure and improved bus infrastructure for instance). These measures should also be enshrined in Grampian Planning Conditions.

REF5.0212

Outlook

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

From [redacted]
Date Sat 2026-05-02 9:35 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[redacted]

Dear Strategic Planning Team,

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

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

I therefore set out below my objections to specific modifications.

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

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

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

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

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

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

MM18- With SS19 being one of the first green belt sites to be developed, and a year 7 place deficit until 2028/29, this does not provide the assurance that there will be adequate educational provision in the S12 area. Paragraph 3.2.3 of the Integrated Impact Assessment Report Addendum: Modifications Consultation (document here) states that, if a city centre school was built, it would be unlikely to be ready in time for the forecast peak deficit in places, weakening this mitigation further still. The moderation also fails to address how the educational needs of a post 16 student population, which continues to rise and will peak in 2028/29, will be met. This is a particular concern for S12 as the population will increase significantly with the planned development and south-east Sheffield has no post-16 provision.
There are also significant concerns about primary school provision across the S12 area, with Charnock Primary Academy (the primary school closest to SS19) already being oversubscribed by 33% (Sheffield City Council, 2025). The plan proposes the development of approximately 1,600 new homes in this part of the city (Draft Sheffield Local Plan Interactive Map and Sheffield Additional Site Allocations), growth that would ordinarily require a new primary school if delivered as a single strategic development. However the plan fails to demonstrate that essential education infrastructure can support the proposed level of growth.
MM19- The wording "include consideration" is non-binding and fails to secure delivery. The modification does not commit to a new facility, which is not allocated a site, and does not address the spatial mismatch between need and provision. S12, which lies outside the Central Sub-Area, is expected to absorb significant residential growth with just one extra consultation room being allocated to the area in the plan, despite having pockets of high deprivation and subsequent poor health outcomes. MM19 does not demonstrate how healthcare needs arising from this growth will be met, and fails the NPPF tests of effectiveness and justification, and risks exacerbating health inequalities unless strengthened.
Concerns around the impact of development on health and wellbeing are supported by the revised IIA (which can be found here) which states that 'some new site allocations may reduce the overall amenity experienced by nearby residents. Although the Plan already includes measures to minimise these effects, it is unlikely that all remaining negative impacts can be fully avoided'. Paragraph 5.2.2 of this document also acknowledges that removal of greenbelt will have 'some negative effects in terms of mental health and wellbeing' on surrounding communities.
MM20 -The phrase "wherever practicable" is unacceptably ambiguous in a policy area that is critical to sustainable development and infrastructure delivery. It provides no commitment or assurance that transport improvements will be secured. The modification fails the NPPF tests of effectiveness and clarity, and risks undermining modal shift, accessibility, and safety objectives. It also weakens the plan's ability to secure equitable outcomes across sub-areas. The wording must be replaced with a firm commitment to secure transport improvements proportionate to development scale and impact, supported by planning obligations and the Infrastructure Delivery Plan.
This is particularly important for the S12 area, where transport is a significant concern in relation to the scale of development proposed. The Sheffield Local Plan identifies approximately 1,600 new homes across S12, which will inevitably generate a substantial increase in traffic movements and place additional pressure on an already constrained local road network. However, due to the dispersed spatial distribution of these allocations, there is currently no clear or coordinated transport strategy demonstrating how the cumulative impact of these developments will be mitigated.
The plan does not provide sufficient detail regarding required junction improvements, public transport capacity, pedestrian and cycling infrastructure, or wider highway mitigation measures necessary to support this level of growth. Without clear and deliverable transport commitments, there is a risk that the cumulative traffic impacts will significantly worsen congestion, reduce road safety, and undermine the sustainability of the area. Paragraph 5.6.5. If the IIA states that site SS19 'benefits
from its proximity to the blue tram route and a high-frequency bus corridor', however, the lived experience of current residents is that this route is already under pressure during peak times and

buses are infrequent and unreliable. As such, it is unclear how the proposed level of housing growth in S12 can be accommodated without substantial and clearly defined transport infrastructure improvements.
MM127 & MM128- The Plan suggests that Green Belt windfall sites could deliver up to 50% affordable housing, but there is no evidence this is achievable in practice. In fact, the Council's own evidence shows that sites like SS19 are only likely to deliver around 30% affordable housing. This creates a clear gap between what the policy promises and what can actually be delivered.
The Plan also relies on "windfall" sites to deliver higher levels of affordable housing. However, windfall sites are uncertain and cannot be guaranteed to come forward, or to deliver the infrastructure and affordable housing needed.
This means the Plan is relying on outcomes that may never happen, while still allowing development on Green Belt land.
The Council's own housing needs evidence shows that the majority of housing need in Sheffield is for affordable housing. However, the Plan relies on sites such as SS19 that are only likely to deliver around 30% affordable housing, alongside uncertain windfall development. This fails to align with the identified need and undermines the justification for releasing Green Belt land. As a result, the approach is not justified, not reliable, and does not provide confidence that the promised affordable housing will be delivered.
MM224 MM 227- These modifications recognise that some sites have constraints (such as flood risk, access issues, and environmental limits), but there is no evidence of any level of recalculation to ascertain the reduction in buildable area and therefore reduction of the number of homes expected from those sites.
This raises concerns that the Plan is overestimating how many homes can actually be delivered. If parts of sites cannot be built on, the total housing numbers should be reduced accordingly.
In the case of sites such as SES13, the Plan acknowledges the need for buffers but does not reassess how this affects the number of homes the site can deliver.

More worryingly, SS19 is not included in these modifications even with significant constraints, including flood risk and the ecological corridor as well as additional buffers for the brook and hedgerows, this creates a risk that the Plan is relying on housing numbers that are not realistic, which undermines confidence that the overall housing target can be met & with such a low "buffer" of housing above the target, the plan could fail should the reality be reflected.
As a result, the Plan is not reliable, the modifications are not consistent across sites and does not provide a clear or accurate picture of what can actually be delivered.
MM429 (SS19) - The S12 Green Belt Action Group has submitted two previous consultation statements for MM429 (SS19) which highlight significant site constraints including flood risk and the ecological corridor, the need to protect the robin brook and its impact on the Moss Valley SSSI along with access constraints and hedgerow buffers but SS19 is not referenced in MM224 or MM227, which should require recalculation of housing impact across site allocations. This omission is concerning. If SS19's constraints are serious enough to warrant modification text, they should also trigger a reassessment of its contribution to housing supply. The failure to cross-reference SS19 in the impact recalculation undermines the credibility of the housing trajectory and suggests that constraint-driven reductions are not being applied consistently. This raises soundness concerns under NPPF paragraph 36(b) and (c): the plan may not be justified or effective if constrained sites are retained without transparent recalibration. The inconsistency also risks undermining spatial equity, as less constrained sites may be overburdened to compensate for undeliverable allocations like SS19.
It is also apparent that even with amended brook buffers and hedgerow buffers, the appropriate buffering has not been removed from the developable area, it is believed this will have an impact on the number of houses that are deliverable on the site and therefore impact the viability of the site.

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

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

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

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

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

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

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

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

Yours sincerely,

Haley Spyve

REF5.0213

Outlook

RE: Please do not build on greenbelt land at White Lane Woodhouse etc. There are enough pockets of unused wasteland around Sheffield without destroying the countryside. I appreciate housing is needed but at what cost. How many houses are empty and negl...

From [redacted]
Date Tue 2026-05-12 8:38 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

[redacted]

From my opening comments you get I am against building on greenbelt land S12 S13 (these areas affect me directly)and any other greenbelt land. There are many pockets of unused land and empty houses crying out to be put back into housing stock. Halfway where the Mill pub once stood derelict and overgrown, Lightwood another blot on the landscape. Empty park houses boarded up in Richmond Park, Hollinsend Park. I have raised these issues with my local councillor but still nothing is done. I will not have a rant about the shocking state of the roads if you drive a car you know but I will ask where the money goes from fines for going thru town bus gates etc this should be ploughed back into major road infrastructure and there is no need to mess with Shalesmoor making it cycle friendly.

Chris Greenwood

Sent from Samsung Mobile on O2

-------- Original message --------
From: SheffieldPlan <sheffieldplan@sheffield.gov.uk>
Date: 08/05/2026 11:22 (GMT+00:00)
To: [redacted]
Subject: Re: Please do not build on greenbelt land at White Lane Woodhouse etc. There are enough pockets of unused wasteland around Sheffield without destroying the countryside. I appreciate housing is needed but at what cost. How many houses are empty and negl...

Hi,

Thank you for your email.

We weren't able to fully read your comments because they were posted in the email title which has a character limit. Please could you resubmit them in the email itself or as an attached document to ensure we have your comments in full.

Thank you,

[redacted]

From: [redacted]
Sent: 02 May 2026 10:09 AM
To: SheffieldPlan <sheffieldplan@sheffield.gov.uk>
Subject: Please do not build on greenbelt land at White Lane Woodhouse etc. There are enough pockets of unused wasteland around Sheffield without destroying the countryside. I appreciate housing is needed but at what cost. How many houses are empty and neglecte...

Sent from Samsung Mobile on O2

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REF5.0214

Outlook

S13 Green Belt Plan

From [redacted]
Date Sat 2026-05-02 11:46 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[redacted]

Hello,

I am writing this E-Mail to strongly object to the plans for the S13 Green Belt. The plans to build so many houses in one area is absolutely crazy.To build on this Green Belt in a so called Sheffield a Green City is madness.Sheffield is not a Green City with this Plan.Pollution to increase,Traffic to increase,Already Schools,Doctors and Dentist full and more Dirty Air to Breath.S13 needs this Green Belt many people use it for health reasons and to get fresh air so many people have breathing problems due to the increase of traffic and pollution in this area.Sheffield City Council say that they have no more brownfield sites look closer and I think that you will find them.The green belt is full of Nature, Plants, Trees,Wildlife and walks for people to enjoy.Is this a so called Green City to destroy all of this.Once it is gone its gone for good.People vote for their councillors to represent them and to listen to what they are saying the people of S13 are telling you the facts as to why this Plan should not go ahead for once listen to the public.

Many Thanks,
D Tomkins S13 Resident.

REF5.0215

Outlook

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

From [redacted]
Date Sat 2026-05-02 1:24 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[redacted]

Dear Strategic Planning Team,

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

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

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

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

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

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

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

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

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

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

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

Yours faithfully,

Paul Ratcliffe
[redacted]
02/05/2026

REF5.0216

Outlook

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

From [redacted]
Date Sat 2026-05-02 2:42 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[redacted]

Dear Strategic Planning Team,

I have lived at [redacted] and am aware of traffic congestion; the increase in traffic particularly at rush hour; the difficulty in getting local school places; GP surgerys where appointments are nigh on impossible to access and I am extremely concerned about the proposed extra houses being built. I have just returned from our regular walk from here to Ridgeway and back, passing the beautiful fields in question where hundreds more houses are planned and I am horrified. How vehicles will access the surrounding main roads at rush hour when there are always queues in both directions with Supertram also sharing the road is beyond my comprehension. More pollution, accidents, road rage and stress for residents old and new must surely be the outcome?

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

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

I therefore set out below my objections to specific modifications.

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

Further to this, paragraph 5.9.8 of the Impact Assessment Report Addendum: Modifications Consultation (referred to in this document as IIA from this point, which can be found here) confirms that 'permanent negative effects would remain' on the environment and landscape character of SS19 as a result of its development. The assessment also confirms in

paragraph 5.9.12 that the moderation of allocating green belt sites for development will have predominantly negative effects that will be difficult to fully mitigate.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The modifications also fail to consider the impact of North East Derbyshire District Council's Local Plan, particularly its proposed allocation immediately adjacent to SS19 (site reference

45900), which could deliver a further 348 homes alongside shops or a care facility. It is significant that the landowner, promoter and developer for site 45900 are the same as for SS19, yet NEDDC has assessed 45900 as unsuitable for development due to the same constraints repeatedly raised in relation to SS19.

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

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

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

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

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

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

Yours sincerely,

Mrs Teresa Bernadette Loxley

Sent from my Galaxy

REF5.0217

Outlook

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

From [redacted]
Date Sat 2026-05-02 3:44 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Strategic Planning Team,

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

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

I therefore set out below my objections to specific modifications.

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

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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.

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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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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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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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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,

Tracy Wilson & Carl Brocklehurst

[redacted]

REF5.0218

Outlook

Objection to the Proposed Main Modifications to the Sheffield Local Plan - Site SES13

From [redacted]
Date Sat 2026-05-02 5:27 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

[redacted]

We are writing to object to the proposed Main Modification 227 (MM227) in the Sheffield Local Plan in relation to site SES13.

Main Modification 227 is a proposed amendment to a Condition on Development that already exists for site SES13.

We object to MM227 in relation to site SES13 for the following reasons:

It weakens the protections that the original Conditions on Development provided.

It makes the Condition on Development optional rather than compulsory.

The wording "Explore" and "Where feasible" are non-binding and fail to secure delivery. Therefore MM227 would provide no commitment or assurance that the Condition on Development will be delivered.

The original Condition on Development was clear and specific. MM227 make the condition unacceptably ambiguous.

The wording regarding Biodiversity Net Gain is confusing and unclear.

MM227 would dilute the requirements.

There are no longer requirements to provide buffers or to remove any part of the site from the developable area.

Environmental protections were considered to be necessary and so important that they were specified as a Condition on Development. However, MM227 would weaken that Condition on Development to such an extent that it would become invalid and pointless.

The Reason for Change is given as "To ensure the Condition on Development is effective". We completely disagree as MM227 would make the condition much less effective.

For the reasons stated above we believe the Planning Inspectors should NOT go ahead with Main Modification 227 and the original Condition on Development should remain as it is for site SES13.

Mr. D Brocklehurst & Mrs. J Brocklehurst

[redacted]

REF5.0219

Outlook

Sheffield Plan Consultation feedback

From [redacted]
Date Sat 2026-05-02 6:19 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Hi

I responded to the original consultation and I would like to raise my existing concerns.

1. The Sheffield plan and its allocation to housing and commercial land still disproportionately puts a huge amount of the burden on the Ecclesfield, Grenoside and Chapeltown area.

- This will lead to over development of the area without adequate infrastructure, including Drs and Dentists. This will most likely lead to serious illness and loss of life, as people will not be able to get appointments and this will spiral impacting on the whole area. I understand two extra consultation rooms have been made as the solution - that will never cover an increase in people linked to the proposed housing.

- The burden of the additional housing and commercial land should be shared around the whole Sheffield area. This doesn't seem to be happening and SCC simply seem to want to sign off this plan which is inadequate and using Tom Hunts response to a question we put about the plan at the Grenoside consultation that Marie Tindball arranged "if we had, had more time the plan would have looked very different". Why not ask for more time and get the plan right rather than just looking to box tick and get off the desk

- Road network is already stretched and some of the surveys were done at unrealistic times / dates. The traffic will be unbearable and cause significant delay. The pollution will be an issue.

2. Townend Farm

- The issue of food security and being able to provide for ourselves has been highlighted agin with the Iran war. There is so much "brownfield land available" and this should be used first.

- Wildlife destruction and environment destruction cannot be undone and doesn't seem to be given the importance it should have

- Adele and Andrew Riddle being robbed of there livelihood and home

3. Use Brownfield land and not Greenfield

- it makes no sense for ecological reason to use green productive fields for building when alternatives exist
- even if it costs more money, we should always use brownfield before green field

4. Due process does not seem to have been followed and it feels like this is just a done deal

- throughout the process a large volume of material has been made available after the initial deadline dates were set. This is not appropriate and it feels like the SCC is simply hearing objections and then commissioning papers to overcome. This does not feel like the correct way to conduct business.

Kind regards

Anita

REF5.0220

Outlook

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

From [redacted]
Date Sat 2026-05-02 6:55 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Strategic Planning Team,

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

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

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

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

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

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

The Council's own appraisal says the Main Modifications make the Plan worse

for soil and land, landscape, biodiversity and transport. That is not my claim - it
is in the Council's own IIA.

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

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

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

In conclusion, the release of Green Belt land in Sheffield is not necessary, and there is clear evidence to support this. There is a strong and growing community committed to protecting this protected land, and we urge the Council and developers to prioritise the use of brownfield sites first. The key question remains: will the Council listen to

the people of Sheffield and act to preserve the Green Belt, or risk repeating history such as the street trees campaign?

Yours faithfully,

Paul Ratcliffe
[redacted]
02/05/2026

REF5.0221

Outlook

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

From [redacted]
Date Sat 2026-05-02 9:25 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[redacted]

Dear Strategic Planning Team,
I am writing to object to the proposed Main Modifications to the Sheffield Local Plan, and particularly those that impact site SS19. While I recognise the need for a sound and deliverable plan, several of the modifications materially weaken safeguards that are essential for public safety, statutory compliance, and the fair distribution of development impacts across the city.
For these reasons, the proposed modifications fail to meet the tests of soundness set out in paragraph 36 of the National Planning Policy Framework (NPPF), specifically that the Plan must be justified, effective, and consistent with national policy.
I therefore set out below my objections to specific modifications.
MM7- This reframes the purpose of the Green Belt by highlighting only its role in
supporting urban regeneration, while omitting the full set of Green Belt purposes set out in the NPPF. This narrow and reductive wording misrepresents national policy, weakens the strategic function of the Green Belt, and risks distorting future decision-making by
implying that regeneration is its primary or sole purpose. Sheffield's Green Belt prevents sprawl and safeguards the countryside, yet MM7's selective emphasis creates an imbalanced narrative that could be used to justify further releases. The modification is therefore not justified, not effective, and should be amended to reflect the complete
statutory purposes of the Green Belt.
Further to this, paragraph 5.9.8 of the Impact Assessment Report Addendum: Modifications Consultation (referred to in this document as IIA from this point, which can be found here) confirms that 'permanent negative effects would remain' on the environment and landscape character of SS19 as a result of its development. The assessment also confirms in paragraph 5.9.12 that the moderation of allocating green
belt sites for development will have predominantly negative effects that will be difficult to fully mitigate.**MM10 MM11 MM90-MM93 -** The Sheffield Local Plan relies on a significant windfall

allowance of 7,475 homes out of a total supply of 39,159 homes (MM90), equating to approximately 19% of the overall housing supply.
This represents a substantial proportion of housing delivery being dependent on
unallocated and uncertain sites, which by definition are not plan-led. The Plan does not provide sufficient evidence to demonstrate that this level of windfall delivery will be realised in a consistent, sustainable, or timely manner.
MM92 defines that the housing trajectory shows that the Sheffield Local Plan delivers only 298 dwellings above the identified requirement of 38,020 homes. This represents a margin of less than 1% across the entire plan period, providing no
meaningful flexibility to account for delays, non-delivery, viability issues, or infrastructure constraints. This is particularly concerning given the Plan provides only a very small margin above its housing requirement, meaning any shortfall in windfall delivery would
result in the Plan failing to meet its targets.
MM18- With SS19 being one of the first green belt sites to be developed, and a year 7 place deficit until 2028/29, this does not provide the assurance that there will be adequate educational provision in the S12 area. Paragraph 3.2.3 of the Integrated Impact Assessment Report Addendum: Modifications Consultation (document here) states that, if a city centre school was built, it would be unlikely to be ready in time for
the forecast peak deficit in places, weakening this mitigation further still. The moderation also fails to address how the educational needs of a post 16 student population, which continues to rise and will peak in 2028/29, will be met. This is a particular concern for S12 as the population will increase significantly with the planned development and south-east Sheffield has no post-16 provision.
There are also significant concerns about primary school provision across the S12 area, with Charnock Primary Academy (the primary school closest to SS19) already being oversubscribed by 33% (Sheffield City Council, 2025). The plan proposes the development of approximately 1,600 new homes in this part of the city (Draft Sheffield
Local Plan Interactive Map and Sheffield Additional Site Allocations), growth that would ordinarily require a new primary school if delivered as a single strategic development.
However the plan fails to demonstrate that essential education infrastructure can
support the proposed level of growth.**MM19-** The wording “include consideration” is non-binding and fails to secure delivery.
The modification does not commit to a new facility, which is not allocated a site, and does not address the spatial mismatch between need and provision. S12, which lies outside the Central Sub-Area, is expected to absorb significant residential growth with just one extra consultation room being allocated to the area in the plan, despite having pockets of high deprivation and subsequent poor health outcomes. MM19 does not

demonstrate how healthcare needs arising from this growth will be met, and fails the NPPF tests of effectiveness and justification, and risks exacerbating health inequalities unless strengthened.
Concerns around the impact of development on health and wellbeing are supported by the revised IIA (which can be found here) which states that 'some new site allocations may reduce the overall amenity experienced by nearby residents. Although the Plan already includes measures to minimise these effects, it is unlikely that all remaining
negative impacts can be fully avoided'. Paragraph 5.2.2 of this document also acknowledges that removal of greenbelt will have 'some negative effects in terms of mental health and wellbeing' on surrounding communities.
MM20 -The phrase "wherever practicable" is unacceptably ambiguous in a policy area that is critical to sustainable development and infrastructure delivery. It provides no commitment or assurance that transport improvements will be secured. The modification fails the NPPF tests of effectiveness and clarity, and risks undermining modal shift, accessibility, and safety objectives. It also weakens the plan's ability to secure equitable outcomes across sub-areas. The wording must be replaced with a firm commitment to secure transport improvements proportionate to development scale and impact, supported by planning obligations and the Infrastructure Delivery Plan.
This is particularly important for the S12 area, where transport is a significant concern in relation to the scale of development proposed. The Sheffield Local Plan identifies approximately 1,600 new homes across S12, which will inevitably generate a substantial increase in traffic movements and place additional pressure on an already constrained local road network. However, due to the dispersed spatial distribution of these allocations, there is currently no clear or coordinated transport strategy demonstrating how the cumulative impact of these developments will be mitigated.
The plan does not provide sufficient detail regarding required junction improvements,
public transport capacity, pedestrian and cycling infrastructure, or wider highway
mitigation measures necessary to support this level of growth. Without clear and
deliverable transport commitments, there is a risk that the cumulative traffic impacts willsignificantly 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 existingbuilt-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,
K Johnson

Sent from my iPhone

REF5.0222

Outlook

Sheffield local plan - main modifications MM411 - Site SES30

From [redacted]
Date Sat 2026-05-02 9:37 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Here is your final letter with today's date added:

Rebecca White
[redacted]
2 May 2026

Sheffield City Council
Planning inspectors

Dear Sir/Madam,

Re: Sheffield Local Plan – Consultation on Main Modifications (MM411 – Site SES30)

I am writing in response to the consultation on the Main Modifications to the Sheffield Local Plan, specifically Main Modification MM411 relating to the proposed allocation of Site SES30.

Grounds of Objection

For the avoidance of doubt, I consider the Sheffield Local Plan, in respect of Main Modification MM411 and the allocation of Site SES30, to be unsound.

The plan fails the tests of soundness set out in paragraph 35 of the National Planning Policy Framework (NPPF), as it is:

- **Not positively prepared** – it does not demonstrate that development needs cannot be met through less harmful alternatives, including the use of available brownfield land.
- **Not justified** – it is not based on proportionate or robust evidence and does not represent the most appropriate strategy when considered against reasonable alternatives.
- **Not effective –** there is no clear evidence that Site SES30 is deliverable within the plan period.
- **Not consistent with national policy** – the allocation conflicts with multiple provisions of the NPPF, as set out below.

In addition, the plan fails to meet the legal Duty to Cooperate under Section 33A of the Planning and Compulsory Purchase Act 2004.

I am writing to express my deep disappointment following the recent hearings and the decision made by the independent inspector. As a member of the local community, I feel that the time, effort, and genuine concern shown by residents has not been meaningfully taken into account. This is where we live. It is part of our daily lives and our identity as a community, and it has been for generations of local families.

I, along with many others—including professionals—firmly believe that the proposals for Site SES30 are wholly unsuitable. The inclusion of a proposed multi-faith burial ground and a secondary school raises serious concerns. At the hearings it was stated that neither of these uses were required, yet the land would still be allocated. If these uses are not needed, then a key part of the justification for releasing the land disappears. There is also concern that these uses may not be genuine long-term requirements and that the site could ultimately be used for further housing instead.

I cannot understand how anyone could look at this site and see anything other than how beautiful it is. To destroy this area would be morally wrong. Once it is gone, it will be gone forever. I cannot imagine living in Woodhouse without these fields, which I have known and used since childhood, as have generations of my family before me. Our community is very village-like, and the proposed development would fundamentally damage this.

The land within Site SES30 remains largely as it would have been for centuries. It can be traced back to the Domesday Book of 1066, and charters exist relating to these fields from around 1130. This area has played a central role in people's everyday lives—people have lived here, worked here, raised families here, and been laid to rest here. This is our local history and we are very proud of it.

Part of this site includes the Cinder Hill Quaker Burial Ground, which is recorded on the local heritage list and has been recommended for formal adoption, with input from South Yorkshire Archaeology Service. The site is clearly marked on historic maps across multiple time periods, reinforcing its long-standing importance.

It should also be noted that the burial ground is currently being assessed by organisations including Historic England and Hallam Historic Buildings. This indicates that its full heritage significance is still being actively evaluated. It is therefore premature to allocate the site for development before this process is complete, contrary to paragraph 194 of the NPPF.

In addition, elements of the original dry stone boundary walls associated with the burial ground remain in situ and pre-date 1 July 1948. These structures form part of the historic curtilage of the burial ground and are considered to be protected as curtilage structures in planning terms. Their presence further reinforces the historic integrity of the site.

Despite this, there appears to have been little or no meaningful assessment of these heritage assets within the plan. This is contrary to paragraphs 199 and 203 of the NPPF. Furthermore, given that the land has remained largely undisturbed for centuries, archaeological remains are likely to be present. Paragraph 205 of the NPPF requires appropriate assessment, which has not been demonstrated.

The proposed allocation would result in the loss of valued open space, contrary to paragraph 99 of the NPPF. The land is actively used by the community for recreation, including walking and dog walking, and is clearly not surplus. No replacement provision has been identified.

There are also significant environmental constraints. The site contains protected trees, established and potentially ancient hedgerows, and important natural features. It is located near ancient woodland, an irreplaceable habitat protected under paragraph 180(c) of the NPPF.

The land is also likely to include Best and Most Versatile agricultural land, which paragraph 174(b) of the NPPF seeks to protect. In addition, there are natural springs, watercourses, historic mine workings, and known flooding issues, raising serious concerns regarding stability and flood risk, contrary to paragraph 167.

Public footpaths cross the site and are well used by the community, and their loss or diversion would significantly harm accessibility and amenity.

When all of these constraints are considered cumulatively, it is unclear how development could be delivered without causing significant harm. In my view, the site is not realistically deliverable within the plan period.

There are also serious ecological concerns. Under the Environment Act 2021, all developments must deliver at least 10% Biodiversity Net Gain. However, there is no evidence showing how this could be achieved at Site SES30. The Council's own ecological assessment assigns high importance to the habitats across the site and even suggests the land could be suitable for BNG registration. This is a clear contradiction.

The ecological appraisal was published after the decision to allocate the site and states that protected species surveys should have been completed beforehand. This demonstrates that the allocation was made without a complete and robust evidence base, contrary to paragraph 35 of the NPPF. The full impact on wildlife remains unknown.

There also appears to be inconsistency in the Council's environmental approach. While initiatives such as tree planting are being promoted, the plan proposes development on established natural habitats. Tree planting cannot replace the complexity and biodiversity value of long-established ecosystems. This raises concerns about whether environmental objectives are being applied consistently, contrary to paragraph 174 of the NPPF.

There are also wider concerns regarding Green Belt policy. Paragraph 140 of the NPPF states that Green Belt boundaries should only be altered in exceptional circumstances. In this case, the justification appears to rely on the provision of a school and burial ground. If these uses are not required, then the exceptional circumstances no longer exist.

The loss of Green Belt is permanent and irreversible. Once removed, it cannot be reinstated. Releasing this land without clear and justified need is therefore unacceptable.

The Main Modifications refer to Green Belt "golden rules," including affordable housing, open space under Policy NC15, and compensatory improvements. However, there is no clear mechanism showing how these will be secured or enforced. It is unclear how established Green Belt can be meaningfully replaced. This reliance on vague measures undermines the effectiveness and justification of the plan.

The Council's own Integrated Impact Assessment shows that the modified plan performs worse in key areas including soil and land, landscape, biodiversity, and transport. This raises serious concerns as to how the plan can be considered justified.

Evidence from the Campaign to Protect Rural England indicates that there is sufficient brownfield land for over one million homes, with a significant proportion already having planning permission. Brownfield land is a continually renewing resource, yet this option does not appear to have been properly explored.

At the same time, the UK is losing approximately 3,800 acres of countryside each year, including Green Belt land. This highlights the importance of protecting what remains.

There is also inconsistency in site selection. Sites such as SES27 have been removed due to lack of availability, yet SES30 is being proposed without clear evidence that it is deliverable. The site is subject to agricultural tenancies, which may take considerable time to resolve, and there is no evidence demonstrating that this can be achieved within the plan period. Paragraph 67 of the NPPF requires sites to be deliverable, which has not been demonstrated.

There is also clear evidence from decisions across England that Green Belt policy is being applied more rigorously elsewhere.

The Secretary of State upheld Thurrock Council's refusal of development on Green Belt land, including housing, shops, and a medical centre, on the basis of harm to the Green Belt and local community. Similarly, development proposals to the east of Tring in Hertfordshire for up to 1,400 homes were refused due to inappropriateness and lack of very special circumstances.

Other councils, including Dudley, Hertsmere, North East Derbyshire, and Cheshire West and Chester, have withdrawn or refused Green Belt developments following concerns about harm and lack of need.

At Arkley in Barnet, a planning inspector rejected development due to harm to openness, important views, and the land's role in recreation.

Locally, Sheffield City Council refused development at Loicher Lane, Ecclesfield, on Green Belt land due to its urbanising effect and harm to openness. At Parkwood Springs, a large brownfield site, residential development was ruled out in order to protect green space and avoid encroachment on Green Belt.

These examples demonstrate that Green Belt policy is being applied more rigorously elsewhere, even where sites present fewer constraints than SES30.

There are also serious procedural concerns. The allocation of SES30 has been introduced through Main Modifications, which should not introduce new sites unless absolutely necessary for soundness. This should have triggered consultation under Regulation 18 or 19, which did not occur.

The Duty to Cooperate also appears not to have been met, with insufficient evidence of effective engagement with neighbouring authorities such as Rotherham and Derbyshire, contrary to Section 33A of the Planning and Compulsory Purchase Act 2004 and paragraph 24 of the NPPF.

I also wish to raise concerns regarding the inspector's letter, which provided limited reasoning. While public objection was acknowledged, there was little explanation as to how those concerns were considered. This lack of transparency undermines confidence in the process.

Residents were not properly informed of these proposals. Many did not receive letters, and even now some residents remain unaware. As a community, we have had to raise funds ourselves to inform others and obtain legal advice, which should not have been necessary.

This process has left residents feeling that their views do not matter and that decisions are being made without proper consideration of the community.

In my view, and based on the range and severity of constraints identified, the proposed allocation of Site SES30 is not realistically deliverable within the plan period. The cumulative impact of environmental, heritage, ecological, and infrastructure constraints raises fundamental questions about whether development could proceed without causing significant and unacceptable harm.

As such, the allocation cannot be considered effective, as required by paragraph 35 of the NPPF, and therefore fails a key test of soundness.

For the avoidance of doubt, the plan fails the legal Duty to Cooperate and the tests of soundness set out in paragraph 35 of the NPPF, and therefore cannot lawfully be adopted in its current form.

For all of these reasons, I strongly believe that Site SES30 should be removed from the Local Plan and retained as Green Belt, to continue performing the purpose for which it was originally designated—protecting the countryside, preventing urban sprawl, and preserving the character of the area for future generations.

Thank you for taking the time to consider my comments.

Yours faithfully,
Rebecca White

REF5.0223

Outlook

Fwd: Objection to the use of Greenbelt Site NWS31 ("Horse Field")

From [redacted]
Date Sat 2026-05-02 11:11 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>; [redacted]

External email

Please see attached objections to the Sheffield plan in respect of the horse field at Wharncliffe side NWS31

Isabella Gillespie

---------- Forwarded message ---------
[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.

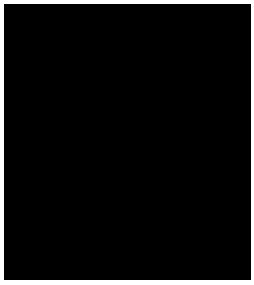
For the reasons outlined above, I respectfully request that site NWS31 be removed from the Sheffield Plan. The proposal is neither sound nor legally compliant and would result in significant and unjustified harm to the local community and environment.

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.

Yours faithfully,

Isabella Gillespie



REF5.0224

Outlook

Objection to SE30 - Main Modification MM411

From [redacted]
Date Sun 2026-05-03 9:18 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

1 attachment (52 KB)
Site SES30_May2026.pdf;

External email

3rd May 2026

Site SES30 - Bramley Lane / Beaver Hill Road (MM411)

I consider it unsound to release this site from the Green Belt. I want the site removed from the plan and kept as Green Belt.

The S13 greenbelt is an essential greenspace supporting wildlife and recreation in Handsworth that along with SES29 -Hall Farm fulfills the prime objective of preventing urban sprawl into Rotherham (RMBC) whose own continued RMBC Waverley development sprawls right up to the boundary with Handsworth.

I understand that under the Environment Act 2021, all new developments are legally required to deliver at least 10% Biodiversity Net Gain (BNG). I have been unable to find how the Council will achieve this on SES30 and there is no mention of it in MM411. Surely this must be clearly stated by the council? How will the proposed inclusion of SES30 result in more or better-quality natural habitat than there was before? The proposed number of new homes on SES30 will suffocate Shirtcliff wood nature reserve, the proposed fifteen-metre buffer is wholly inadequate to protect this ancient woodland. The Council's own ecological assessment assigns high importance to every area of habitat on the site. This ecological appraisal was published months after the decision to allocate the site and states that protected species surveys should have been completed before determining to put the site forward. Shirtcliff is a narrow woodland no more than hundred metres at its widest, home to ancient trees, flora and wildlife, it is already under pressure from competing recreational demands. It will not survive such a large development proposed in SES30.

I believe the council has over allocated greenbelt/green field land instead of maximising brownfield regeneration.

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

I would like to be notified of the final report.

Yours sincerely

Nigel Dorman

[redacted]

3rd May 2026

Site SES30 - Bramley Lane / Beaver Hill Road (MM411)

I consider it unsound to release this site from the Green Belt. I want the site removed from the plan and kept as Green Belt.

The S13 greenbelt is an essential greenspace supporting wildlife and recreation in Handsworth that along with SES29 -Hall Farm fulfills the prime objective of preventing urban sprawl into Rotherham (RMBC) whose own continued RMBC Waverley development sprawls right up to the boundary with Handsworth.

I understand that under the Environment Act 2021, all new developments are legally required to deliver at least 10% Biodiversity Net Gain (BNG). I have been unable to find how the Council will achieve this on SES30 and there is no mention of it in MM411. Surely this must be clearly stated by the council? How will the proposed inclusion of SES30 result in more or better-quality natural habitat than there was before? The proposed number of new homes on SES30 will suffocate Shirtcliff wood nature reserve, the proposed fifteen-metre buffer is wholly inadequate to protect this ancient woodland. The Council's own ecological assessment assigns high importance to every area of habitat on the site. This ecological appraisal was published months after the decision to allocate the site and states that protected species surveys should have been completed before determining to put the site forward. Shirtcliff is a narrow woodland no more than hundred metres at its widest, home to ancient trees, flora and wildlife, it is already under pressure from competing recreational demands. It will not survive such a large development proposed in SES30.

I believe the council has over allocated greenbelt/green field land instead of maximising brownfield regeneration.

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

I would like to be notified of the final report.

Yours sincerely



Nigel Dorman



REF5.0225

Outlook

Objection to SES29 - Main Modification MM410

From [redacted]
Date Sun 2026-05-03 10:04 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

1 attachment (51 KB)
Site SES29_May2026.pdf;

External email

3rd May 2026

Site SES29 - MM410 Handsworth Hall Farm, Land at Finchwell Road, S13 9AS

I consider it unsound to release this site from the Green Belt. I want the site removed from the plan and kept as Green Belt.

The S13 greenbelt is an essential greenspace supporting wildlife and recreation in Handsworth that along with SES30 - Bramley Lane / Beaver Hill Road fulfills the prime objective of preventing urban sprawl into Rotherham (RMBC) whose own continued RMBC Waverley development sprawls right up to the boundary with Handsworth.

Sheffield council is pursing a policy of low density homes per hectare fostering urban sprawl into the neighbouring council (Rotherham) without demonstrating sufficient cooperation with Rotherham regarding housing. As such I believe the council has over allocated greenbelt/green field land instead of maximising brownfield regeneration.

The council has made unachievable housing figure assumptions demonstrating its rushed inclusion into the plan in order to meet government home building figures. This does not justify using greenfield/belt land in S13.

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

I would like to be notified of the final report.

Yours sincerely

Nigel Dorman

[redacted]

3rd May 2026

Site SES29 - MM410 Handsworth Hall Farm, Land at Finchwell Road, S13 9AS

I consider it unsound to release this site from the Green Belt. I want the site removed from the plan and kept as Green Belt.

The S13 greenbelt is an essential greenspace supporting wildlife and recreation in Handsworth that along with SES30 - Bramley Lane / Beaver Hill Road fulfills the prime objective of preventing urban sprawl into Rotherham (RMBC) whose own continued RMBC Waverley development sprawls right up to the boundary with Handsworth.

Sheffield council is pursing a policy of low density homes per hectare fostering urban sprawl into the neighbouring council (Rotherham) without demonstrating sufficient cooperation with Rotherham regarding housing. As such I believe the council has over allocated greenbelt/green field land instead of maximising brownfield regeneration.

The council has made unachievable housing figure assumptions demonstrating its rushed inclusion into the plan in order to meet government home building figures. This does not justify using greenfield/belt land in S13.

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

I would like to be notified of the final report.

Yours sincerely



Nigel Dorman



REF5.0226

Outlook

Sheffield Plan Modifications

From [redacted]
Date Sun 2026-05-03 10:08 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Sirs

Hi

I responded to the original consultation and I would like to raise my existing concerns as these have not been addressed in the modification corresponance.

1. The Sheffield plan and its allocation to housing and commercial land still disproportionately puts a huge amount of the burden on the Ecclesfield, Grenoside and Chapeltown area.

- This will lead to over development of the area without adequate infrastructure, including Drs and Dentists. This will most likely lead to serious illness and loss of life, as people will not be able to get appointments and this will spiral impacting on the whole area. I understand two extra consultation rooms have been made as the solution - that will never cover an increase in people linked to the proposed housing.

- The burden of the additional housing and commercial land should be shared around the whole Sheffield area. This doesn't seem to be happening and SCC simply seem to want to sign off this plan which is inadequate and using Tom Hunts response to a question we put about the plan at the Grenoside consultation that Marie Tindball arranged "if we had, had more time the plan would have looked very different". Why not ask for more time and get the plan right rather than just looking to box tick and get off the desk.

- Road network is already stretched and some of the surveys were done at unrealistic times / dates. The traffic will be unbearable and cause significant delay. The pollution will be an issue.

2. Townend Farm

- The issue of food security and being able to provide for ourselves has been highlighted agin with the Iran war. There is so much "brownfield land available" and this should be used first.

- Wildlife destruction and environment destruction cannot be undone and doesn't seem to be given the importance it should have.

- Adele and Andrew Riddle being robbed of their livelihood and home.

3. Use Brownfield land and not Greenfield

- it makes no sense for ecological reason to use green productive fields for building when alternatives exist
- even if it costs more money, we should always use brownfield before green field

- Sheffield historically has had one of the largest industrial bases in the UK and I fine it incredible the council could not find enough brownfield sites.

4. Due process does not seem to have been followed with numerous documents presented after decisions have been made.

- if this was any other industry presenting important documents after decisions/consultation dates would have at the very least aroused suspicion and in most cases just been thrown out as important decisions are not able to be challenged as all of the documentation has not been made available in the public domain.

Martyn Gregory
[redacted]

REF5.0227

Outlook

Sheffield Plan Main modifications response

From [redacted]
Date Sun 2026-05-03 11:20 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

1 attachment (1,014 KB)
CH04 MM submission final .docx;

External email

Please find attached my response to the main modifications
Sent via email as I cannot get the online link to work for some reason.!

Yours
Lynda Jackson

SHEFFIELD LOCAL PLAN EXAMINATION

SHEFFIELD PLAN MAIN MODIFICATIONS CONSULTATION MAY 2026

Submitted to: Sheffield Local Plan - Inspectors

Subject: Objection to Main Modifications MM460

Date: May 2026

Respondent: Lynda Jackson

Sheffield Local Plan Examination
Main Modifications Consultation

I write in response to the Main Modifications consultation on the Sheffield Local Plan, specifically in relation to the proposed allocation of Site CH04 (Hesley Wood) under Main Modification MM460.

Please find enclosed my detailed representation, which sets out a comprehensive objection to the allocation. This submission has been prepared having regard to the statutory tests of soundness under Section 20(5) of the Planning and Compulsory Purchase Act 2004 and the requirements of paragraph 35 of the National Planning Policy Framework.

In summary, it is submitted that the allocation of Site CH04 is not sound. The evidence demonstrates that the site is subject to significant and interrelated constraints, including contamination, ground instability, ecological sensitivity, transport limitations, and proximity to existing residential and commercial receptors. These issues are not adequately resolved within the Main Modifications and are instead deferred to later stages of the planning process.

Particular concern is raised in relation to transport impacts, where the evidence indicates that safe and suitable access cannot be achieved and that the residual cumulative impacts on the highway network would be severe. The network is already operating at or beyond capacity, and the addition of development at CH04 would contribute to systemic failure.

The submission also identifies fundamental deficiencies in the evidence base, including the absence of an up-to-date Brownfield Land Register and the failure to demonstrate that reasonable alternatives to Green Belt release have been exhausted.

For these reasons, and as set out in detail within the accompanying report, it is respectfully requested that the allocation of Site CH04 be found unsound and removed from the Plan.

I would welcome the opportunity to participate in any further hearing sessions in relation to this matter.

Yours faithfully,

Lynda Jackson

OBJECTION REPORT – MM460 - SITE CH04 (HESLEY WOOD)

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1. Introduction

This report provides a detailed and evidence-based objection to the allocation of Site CH04 (Hesley Wood) within the Sheffield Local Plan, as confirmed by Main Modification MM460. It has been prepared in the context of the statutory examination process and is intended to assist the Inspector in assessing whether the Plan satisfies the requirements of soundness under Section 20(5) of the Planning and Compulsory Purchase Act 2004. In particular, the report considers whether the allocation is justified, effective, and consistent with national policy, as required by paragraph 35 of the National Planning Policy Framework.

National policy, as set out in the National Planning Policy Framework, requires that previously developed land is prioritised and that Green Belt boundaries should only be altered in exceptional circumstances. This necessarily implies a sequential approach, whereby less constrained and more sustainable sites are considered first. It is therefore particularly concerning that Sheffield City Council, which has historically played a role in the development of national policy frameworks, appears not to have maintained a robust and up-to-date Brownfield Land Register since 2019, as required under the Town and Country Planning (Brownfield Land Register) Regulations 2017.

The absence of a current register since 2019 represents a material deficiency in the evidence base. This omission is not a minor administrative oversight but a critical failure that goes to the heart of the Plan's justification. In the absence of a robust, up-to-date register, there is no credible basis on which the Council can claim that brownfield opportunities have been exhausted. The release of Green Belt land at CH04 in these circumstances is therefore not only unjustified but indicative of a flawed and unsound site selection process. Put simply, the Plan seeks to rely on exceptional circumstances that it has not demonstrated, supported by evidence it has not properly prepared.

Consequently, the Council cannot meet the requirements of paragraphs 140–143 of the National Planning Policy Framework, which require that exceptional circumstances are fully evidenced. Without this foundational evidence, the allocation of CH04 is not justified and fails to satisfy the statutory test of soundness under Section 20(5) of the Planning and Compulsory Purchase Act 2004.

The conclusions reached in this report are that the allocation of Site CH04 fails all three of these tests. The site is subject to a range of significant and interrelated constraints, including contamination, unstable ground conditions, ecological sensitivity, and proximity to existing residential and commercial receptors. These constraints are not adequately addressed within the Plan or within Main Modification MM460, which

instead relies on the deferral of critical issues to later stages of the planning process. This approach is inconsistent with the requirements of plan-making and undermines the credibility of the allocation.

2. Site Context and Characteristics

Site CH04 comprises approximately 15.86 hectares of land located at Hesley Wood, to the north of Cowley Hill in the S35 area. The site is proposed for general employment use, with approximately 13.35 hectares identified for industrial and logistics development. The scale of development envisaged is substantial and is consistent with large-format warehouse and distribution uses, potentially extending to approximately 1,000,000 square feet of floorspace.

The site itself is a former colliery spoil heap which has undergone natural regeneration over time and is now heavily wooded. This woodland has become established and performs a number of important ecological and environmental functions. The landform is characterised by significant changes in level, with the site occupying an elevated position above existing residential development. In addition, the site contains multiple mine shafts and is located adjacent to a Local Wildlife Site. It is also notable that an operational public house and restaurant is located within the wooded area in close proximity to the proposed development zone.

These characteristics combine to create a site that is inherently complex and constrained. Importantly, the constraints are not isolated but interact in ways that amplify risk. For example, the presence of contamination within a sloping site directly above residential properties creates a clear pathway for pollutant migration. Similarly, the removal of woodland to facilitate development has implications not only for ecology but also for ground stability and hydrology.

Contradictions - The modification states that development will be confined to the Industrial Zone, yet acknowledges that:

- access roads
- remediation
- land remodelling

will take place within the Local Wildlife Site and Green Space Zones.

This demonstrates that impacts extend beyond the defined development area, which ultimately gives no exact boundaries unlike all other sites within the Plan.

3. Contamination and Ground Conditions

MM460 - "The site has been identified as having potentially contaminated land..."

This clause confirms the presence of contamination but defers assessment and remediation to the planning application stage.

This is a critical failing. Under Policy ES6 and paragraph 189 of the National Planning Policy Framework, sites should be suitable for their intended use at the point of allocation.

The known presence of contamination, combined with the risks of pollutant mobilisation through runoff and airborne particulates, requires detailed assessment prior to allocation. The failure to provide such evidence renders the allocation premature.

The presence of contamination at Site CH04 is not speculative but is evidenced by site investigations undertaken in 2012. Laboratory analysis of groundwater and leachate samples identified dissolved metals, including arsenic, chromium, nickel and zinc, together with detectable concentrations of polycyclic aromatic hydrocarbons (PAHs). The recorded concentrations of PAHs in water samples were in the range of approximately 0.8 to 0.88 micrograms per litre. These substances are widely recognised as toxic and, in the case of PAHs, potentially carcinogenic.

In addition to groundwater contamination, soil analysis demonstrates that PAH concentrations within the spoil material are elevated, in some cases reaching levels in the thousands of micrograms per kilogram. Statistical analysis of the dataset indicates that these concentrations exceed screening values associated with a residential end-use scenario. This confirms that contamination is not only present but is spatially distributed across the site.

The nature of colliery spoil further exacerbates these concerns. Spoil material is inherently heterogeneous and can contain a wide range of contaminants, including combustion residues and heavy metals. It is also structurally unstable and behaves unpredictably when disturbed. In its current condition, the woodland covering the site plays a critical role in stabilising the spoil and limiting the mobilisation of contaminants.

The development proposed under Main Modification MM460 would require extensive earthworks, including excavation, regrading, and land remodelling. These activities would disturb previously stabilised material and expose contaminants to weathering processes. Under paragraph 189 of the National Planning Policy Framework, planning decisions should ensure that land is suitable for its intended use, taking account of ground conditions and contamination. In this case, no detailed remediation strategy has been provided, and no evidence demonstrates that the site can be made suitable.

Instead, these matters are deferred to the planning application stage, which is inconsistent with the requirements of sound plan-making.

Under Sheffield Plan Part 2 **Policy ES6 (Contaminated and Unstable Land)**, development must demonstrate that:

- Land instability and contamination can be safely addressed
- Risks to users and the environment are mitigated
- Remediation is viable and deliverable

However, for CH04:

- The site comprises colliery spoil material with highly variable composition
- No detailed geotechnical assessment has been provided at Plan stage
- No evidence is presented demonstrating that large-scale regrading can be safely achieved

Critical issue:

The Plan allocates the site **before demonstrating compliance with Policy ES6**, contrary to sound planning practice.

EXAM 188 confirms that CH04 is subject to very significant mining constraints, including in excess of ten recorded mine entries, shallow coal workings and coal outcrops, and that the site comprises spoil material from the former Smithy Wood Colliery.

The Mining Remediation Authority advises that development would require detailed investigation, avoidance of mine entries and their zones of influence, and likely remediation. These constraints are extensive and site-wide. When combined with known contamination issues, this creates a highly complex development scenario. There is no evidence that the cumulative impact of these constraints has been assessed in terms of capacity, viability or deliverability.

4. Fundamental Constraints and Environmental Risk

The site comprises colliery spoil which may contain heavy metals, hydrocarbons, and other contaminants. In its current state, woodland cover stabilises the material and reduces environmental risk. However, development would require extensive earthworks, exposing and mobilising these materials.

This creates two primary risk pathways:

- **Contaminated runoff:** Increased surface water flow carrying pollutants downslope toward existing residential areas
- **Airborne pollution:** Dust and particulates generated during construction, potentially containing harmful substances

These risks are heightened by:

- the elevated position of the site
- proximity of housing
- scale of required engineering works

No evidence has been provided to demonstrate that these risks can be effectively mitigated.

5. Runoff, Hydrology and Pollution Pathways

The elevated topography of Site CH04 creates a direct and significant pathway for pollutant migration. The development process would involve the removal of woodland which would significantly alter drainage patterns, and the disturbance of contaminated spoil material, resulting in exposed surfaces that are highly susceptible to erosion and runoff. At the same time, the removal of vegetation would reduce slope stability, increasing the risk of erosion and ground movement. These impacts are interrelated and amplify each other.

Rainfall interacting with these exposed materials would mobilise contaminants and transport them downslope. Given the position of the site relative to existing residential areas, this runoff would naturally flow toward housing located at lower elevations. The presence of confirmed contaminants, including heavy metals and PAHs, means that this runoff would likely carry harmful substances. Contaminated runoff would flow downslope toward existing housing. This is a critical omission in the Plan and IIA.

This is not a theoretical or low-probability risk. It is a predictable consequence of disturbing contaminated material on a sloping site. The absence of detailed hydrological modelling or contamination risk assessment within the Plan represents a significant gap in the evidence base. Under paragraphs 173 to 175 of the National Planning Policy Framework, development should not increase flood risk elsewhere or give rise to pollution. In this case, there is no evidence demonstrating compliance with these requirements.

6. Failure of the Integrated Impact Assessment

The Integrated Impact Assessment does not adequately capture the complexity of CH04. It fails to assess the cumulative impact of the site's constraints, including ground conditions, woodland loss, ecological sensitivity, and proximity to residential areas. It also does not provide a robust comparison with alternative sites.

As a result, the assessment does not provide a sound basis for the allocation of CH04 and does not meet the requirements of a comprehensive environmental assessment.

7. Air Quality and Human Health

The disturbance of contaminated spoil material also gives rise to significant air quality concerns. Large-scale earthworks, including excavation and material handling, will generate dust and airborne particulates. Given the confirmed presence of contaminants within the soil, these particulates are likely to contain PAHs and heavy metals.

Such substances are capable of being inhaled and may pose risks to human health, particularly with prolonged exposure. The scale of development proposed at CH04, combined with the duration of construction activities, suggests that exposure could be both sustained and significant. The proximity of residential properties further increases the potential impact.

In addition, the presence of a public house and restaurant within the wooded area introduces a further sensitive receptor. This is a location where members of the public gather, including outdoor seating areas where food and drink are consumed. The potential for contaminated particulates to settle in such areas raises clear public health concerns.

Under paragraph 191 of the National Planning Policy Framework, planning decisions should ensure that development is appropriate for its location, taking into account the likely effects on health and living conditions. The Plan does not include any detailed air quality assessment and does not demonstrate how these risks would be mitigated either during construction or during occupation. Similarly, local policy (including Policy ES6) requires that contamination is properly assessed and addressed.

The proposed allocation of Site CH04 for general employment use (including Classes B2 and B8) introduces a significant degree of uncertainty in relation to the nature of future operations and their associated environmental impacts. In the absence of an identified occupier or defined end use, it is not possible to properly assess the type, scale, or intensity of activities that may take place on the site. Industrial uses within these classes can include a wide range of processes, some of which involve the storage,

handling, or movement of potentially hazardous materials. This uncertainty is particularly concerning given the proximity of sensitive receptors, with residential properties located approximately 75 metres from the proposed works and a public house and restaurant approximately 85 metres away. Without clarity on the nature of operations, the Plan cannot demonstrate that ongoing emissions, including dust, fumes, noise, and potential accidental releases, can be adequately controlled to protect human health and amenity.

In addition to operational impacts, the underlying characteristics of the site introduce the potential for ongoing environmental risk. The site comprises contaminated colliery spoil, and even following remediation, there remains the possibility of residual contamination being mobilised through disturbance, surface water movement, or changes in ground conditions over time. This creates a continuing pathway for pollutants to migrate beyond the site boundary, particularly given the elevated topography and natural drainage patterns toward surrounding areas. The proximity of a public-facing hospitality use further amplifies this concern, as it represents a location where members of the public may be exposed to airborne particulates or deposited contaminants during normal use of outdoor spaces. In this context, the lack of a clearly defined operational profile, combined with the inherent risks associated with the site's ground conditions, means that the long-term impacts on human health cannot be reliably assessed or dismissed at the plan-making stage.

8. Woodland, Ecology and Biodiversity

The existing woodland at Hesley Wood is an established ecological resource. It supports biodiversity, contributes to habitat connectivity, and performs important environmental functions, including soil stabilisation and water regulation. Its removal would result in immediate and significant ecological harm, habitat loss, disruption of ecological connectivity, and the loss of natural stabilisation and water regulation processes.

The Plan acknowledges that harm to the Local Wildlife Site may occur but relies on mitigation and compensation measures. However, it is well established that mature woodland cannot be replaced within a meaningful timeframe. Newly planted habitats take decades to develop comparable ecological value, and in the interim, there is a net loss of biodiversity.

Under the Environment Act 2021, development is required to deliver biodiversity net gain. Given the relatively high baseline value of the site, achieving this requirement would be particularly challenging. The Plan does not demonstrate how net gain would be achieved, nor does it provide evidence that suitable compensation land is available.

The removal of woodland also has secondary effects, including increased erosion, reduced water absorption, and greater mobilisation of contaminants. These factors further compound the environmental risks associated with the site.

9. Residential and Commercial Impacts

The proximity of the proposed development, including the access roadway and associated land required for ground remediation and reconfiguration, to existing receptors is a matter of significant concern. Measured distances indicate that the nearest residential property lies approximately 75 metres from the proposed works, with an established public house and restaurant located approximately 85 metres away.

These distances are materially closer than previously understood and place both residential and commercial receptors firmly within the zone where adverse impacts are most likely to be experienced. While separation distances must always be considered in context, the nature of the development proposed at Site CH04 is such that these distances are insufficient to provide meaningful protection.

The site occupies an elevated position above these receptors and comprises contaminated colliery spoil which will require extensive disturbance. As a result, both surface water runoff and airborne particulates have direct and credible pathways to surrounding properties. In hydrological terms, the horizontal distance is of limited relevance where the natural gradient of the land directs flow toward receptors. The disturbance of contaminated material will increase the mobilisation of pollutants, which are likely to be transported downslope during rainfall events.

In terms of air quality, the proposed earthworks will generate dust and fine particulates over a sustained construction period. Given the confirmed presence of contaminants within the soil, including heavy metals and polycyclic aromatic hydrocarbons, there is a clear risk that airborne particulates will contain harmful substances. Receptors located within 75 to 85 metres fall well within the range at which such impacts are typically experienced, particularly in the absence of exceptional mitigation measures.

The proximity of a public-facing hospitality use further increases the sensitivity of the site. The pub and restaurant represent a location where members of the public gather and where outdoor spaces may be used for food and drink consumption. The potential for contaminated particulates to settle within these areas introduces a direct public health consideration which has not been addressed within the Plan.

Taken together, the reduced separation distances, combined with the elevated topography, known contamination, and scale of proposed earthworks, indicate that the relationship between the site and surrounding receptors is fundamentally incompatible

with the type of development proposed. The Plan does not demonstrate that these impacts can be mitigated to an acceptable level.

The proximity also creates a constant contamination prospect as the access route continues to be used by a variety of vehicles including HGV's and the emissions and dust created by its use for access.

10. Engineering Complexity and Deliverability

The development of Site CH04 would require extensive engineering works. These include large-scale cut-and-fill operations, stabilisation of spoil material, remediation of contamination, and the treatment of mine shafts. The presence of mine shafts requires detailed investigation and consultation with the Coal Authority and may result in constraints on developable land.

These engineering requirements are complex and costly, and they introduce a high degree of uncertainty. No detailed technical evidence has been provided to demonstrate that the site can be developed safely and effectively. Instead, the Plan assumes that these issues can be addressed at a later stage, which is inconsistent with the requirement for allocations to be evidence-based.

The site is listed at the Mining Remediation Authority as High Risk area and the number of mine access points is numerous as can be seen from the below image which includes many sites on the proposed access to the site.

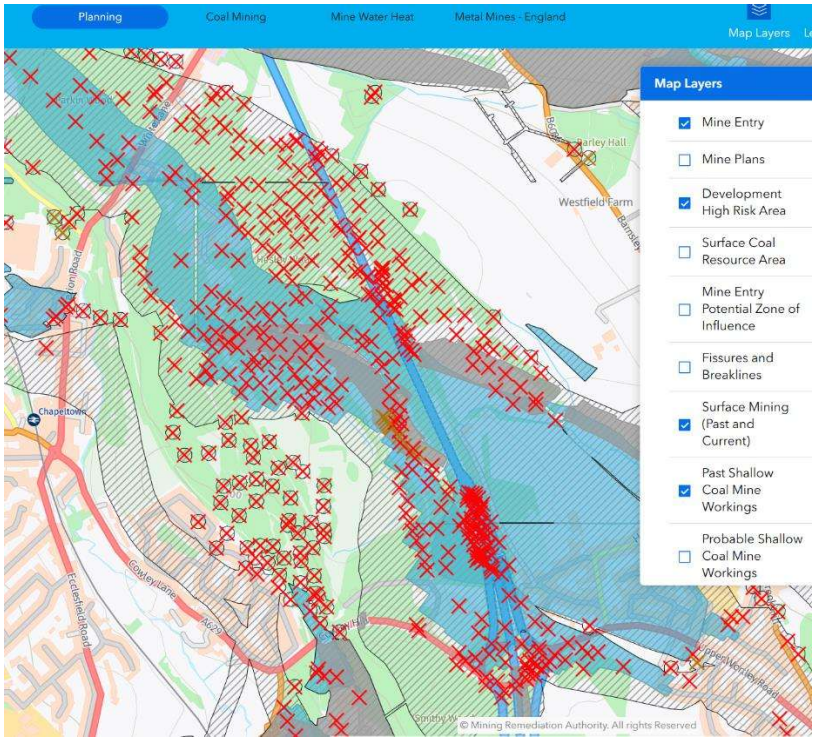


Figure 1Mine entry, high risk area, surface and shallow mine works

EXAM 188 confirms that CH04 is subject to very significant mining constraints, including in excess of ten recorded mine entries, shallow coal workings and coal outcrops, and that the site comprises spoil material from the former Smithy Wood Colliery.

The Mining Remediation Authority advises that development would require detailed investigation, avoidance of mine entries and their zones of influence, and likely remediation. These constraints are extensive and site-wide. When combined with known contamination issues, this creates a highly complex development scenario. There is no evidence that the cumulative impact of these constraints has been assessed in terms of capacity, viability or deliverability. **Quote from Exam 188**

"CH04 This site comprises the spoil material from the nearby Smithy Wood Colliery and the site has a historic mining legacy, with approx.10+ mine entries recorded within the site. It is within a DHRA and is identified as an area with probable shallow coal mine workings - in the north and east of the site where coal outcrops are also located. Given historic mining activity, any formal planning application submitted which includes layout as a consideration *should be supported by CMRA informed by site investigations to locate the mine entries and assess their condition and calculate their zone of influence to inform layout.* **These features are likely to require remediation. Include a condition on development requiring a CMRA**."

This requirement has not been included in the modifications and is grave error of judgement to not include this requirement. Without it this site cannot be included in the plan.

11. Transport, Access and Cumulative Impact

The allocation of Site CH04 is fundamentally undermined by clear and compelling transport evidence demonstrating that safe and suitable access cannot be achieved and that the surrounding highway network is already operating beyond its effective capacity.

A detailed technical review by Ian Taylor (I.Eng MICE), an Incorporated Engineer and Member of the Institution of Civil Engineers with over 35 years' experience has been undertaken of the proposed access arrangements, confirms that the site lies less than 500 metres from M1 Junction 35, a location already subject to significant and recurring congestion, with queues frequently extending back onto the motorway slip roads. This is a matter of particular concern given that national policy requires development to be prevented or refused where there would be an unacceptable impact on highway safety or where the residual cumulative impacts on the road network would be severe. The evidence demonstrates that both of these thresholds are met.

The proposed access point is located directly opposite the signalised Cowley Way junction, which is already operating at or beyond capacity and is subject to frequent congestion and gridlock conditions. The introduction of a new access at this location, serving a large-scale employment or logistics site, would introduce substantial volumes of heavy goods vehicles, light goods vehicles and employee traffic into an already constrained junction. No robust or evidence-based mitigation strategy has been presented to demonstrate that this additional demand could be accommodated safely or efficiently.

The surrounding highway network, including Cowley Hill and Nether Lane, is already heavily trafficked and physically constrained, with limited scope for widening or improvement. These routes also function as informal "rat run" corridors linking the motorway to surrounding settlements, further compounding congestion and safety risks. The existing collision record reinforces these concerns, with multiple serious and slight injury collisions recorded along Cowley Hill and the M1 slip road corridor.

In terms of sustainable transport, the site performs poorly. Walking routes are fragmented, steep, and in many cases absent. Cycling infrastructure is limited and does not meet modern design standards. Public transport provision is weak, with poorly located bus stops and a railway station located approximately 1.6 kilometres away. As a result, the site is inherently dependent on private car use.

However, the most significant concern arises when CH04 is considered cumulatively alongside other allocations within the S35 corridor, including CH03, CH05, NES36, NES37, NES38 and NES39.

A comprehensive cumulative impact assessment demonstrates that the highway network is already operating at what is described as a "structural breaking point" and has effectively reached a condition of zero residual capacity. While individual site assessments may suggest that impacts are manageable in isolation, the combined effect of these developments results in a level of demand that fundamentally exceeds network capacity.

The interaction between residential traffic and continuous 24-hour logistics movements creates what can only be described as a strategic deadlock, particularly at key junctions such as Cowley Hill and M1 Junction 35. The evidence demonstrates that the North Sheffield corridor is incapable of absorbing these competing demands without triggering systemic failure, whereby even minor disruptions result in area-wide congestion and loss of network functionality.

The cumulative impacts extend beyond primary routes into local centres such as Chapeltown and Ecclesfield, where constrained road layouts mean that junction capacity is already exceeded. The introduction of additional traffic would result in widespread congestion, effectively paralysing local movement and access.

As primary routes become saturated, traffic displacement onto unsuitable residential and rural routes becomes inevitable. Roads such as Warren Lane, Yew Lane and

Jumble Lane, which are narrow, lack footways and contain significant geometric constraints, would experience increased traffic flows, including heavy goods vehicles. This creates a severe risk of vehicle-pedestrian conflict and a material deterioration in safety.

Critically, the evidence demonstrates that these impacts are not capable of being mitigated through conventional engineering solutions. The network is already operating at or near full capacity, meaning that even marginal increases in traffic result in disproportionate and severe consequences. This condition of zero residual capacity confirms that the system has no ability to absorb additional demand without failure.

Furthermore, the transport modelling underpinning the Plan is likely to underestimate real-world impacts. Standardised trip rate assumptions do not adequately capture the intensity of modern logistics operations, including 24-hour freight movements, shift changes, and delivery patterns. As a result, the true scale of traffic generation is likely to be materially higher than that assumed within the Plan.

In this context, the allocation of Site CH04 is not supported by robust or proportionate transport evidence. The site cannot be safely accessed, and its development would contribute to severe cumulative impacts on the highway network.

12. Viability and Market Demand

The cumulative effect of the constraints described above is to create a site with exceptionally high abnormal development costs. The engineering and environmental challenges associated with CH04 translate directly into increased costs. Indicative previous developed site comparisons suggest that development costs for CH04 could be in the range of £1 million to £4 million per hectare, compared to approximately £100,000 to £500,000 per hectare for more typical brownfield sites.

At the same time, the proposed scale of development does not align with market demand in Sheffield, which is predominantly for small to medium-sized units. The delivery of large-scale logistics space requires specific occupiers, and there is no evidence that such demand exists for this location.

The absence of identified developers or occupiers further undermines confidence in deliverability. In a competitive market, developers are likely to prioritise less constrained and more viable sites. The removal of woodland adds additional costs, including clearance, biodiversity compensation, and long-term management. These factors compound the already high-cost base and further undermine the deliverability of the site.

Evidence from current market listings indicates that the majority of demand is for small to medium-sized units, generally between 1,000 and 20,000 square feet, with an average unit size of approximately 16,000 square feet.

While larger units do exist, they are relatively limited and are typically delivered in response to specific occupier requirements. Developments of the scale proposed at CH04, totalling up to 1,000,000 square feet, would require multiple large occupiers or a prolonged period of phased delivery.

This creates a mismatch between the proposed development and actual market demand. Although overall vacancy rates in the logistics sector may be low, this reflects demand for smaller units rather than large-scale facilities. As a result, there is a significant risk that the site would not be fully occupied within the Plan period.

The volume of larger developments that are still unoccupied both in Sheffield and adjoining areas clearly demonstrates that there is not the demand for such units. The regeneration and upgrade of the current stock would be more cost effective and reduce the need for further land release.

Comparative Cost Analysis

Site Type	**Typical Abnormal Cost per Hectare**
Brownfield (previously developed)	£100k – £500k
CH04 (colliery spoil site)	£1M – £4M+

This represents a cost differential of approximately:

5 to 10 times higher for CH04

Average cost for tree felling,

removal and disposal is estimated at £10,000–£50,000+ per hectare

Mine Shaft Treatment

Investigation, stabilisation, Grouting and capping works

Estimated £50,000 - £500,000 per shaft

Ground Stabilisation

Treatment of unstable spoil, Potential piling or reinforcement, Long-term settlement considerations

Estimated: **£200,000–£1,000,000+ per hectare**

Earthworks (Cut-and-Fill Operations)

Regrading of spoil heap, Creation of level development platforms, Potential removal of unsuitable material

Estimated: **£500,000–£2,000,000+ per hectare**

Previously developed (brownfield) sites within Sheffield typically benefit from:

- Established infrastructure (roads, utilities)
- Known ground conditions
- Previous engineering or remediation works

Site Clearance costs at these sites between £20,000 and £300,000 for contamination.

The allocation of CH04 is speculative, with no identified developer or end-user committed to its delivery.

While the absence of an occupier is not, in itself, contrary to planning policy, it is highly material in this case due to the significant constraints affecting the site, including colliery spoil conditions, mine shafts, ecological constraints, and the requirement for extensive earthworks.

These constraints introduce substantial cost, complexity, and risk. In the absence of a committed delivery partner, there is no evidence that development is viable or achievable within the Plan period.

Accordingly, the allocation of CH04 fails to demonstrate that the site is deliverable and therefore conflicts with the requirement for effectiveness under paragraph 35 of the National Planning Policy Framework.

13. Brownfield Land Register and Sequential Approach

The Council is under a statutory duty to maintain a Brownfield Land Register under the Town and Country Planning (Brownfield Land Register) Regulations 2017. This register should be updated regularly and used to inform site selection.

However, there is no clear evidence that an up-to-date register has been maintained since 2019. This represents a material deficiency in the evidence base. Without a comprehensive understanding of available brownfield land, it is not possible to demonstrate that all reasonable alternatives have been exhausted.

Under paragraphs 140 to 143 of the National Planning Policy Framework, Green Belt release requires exceptional circumstances, which must be fully evidenced. The failure to properly assess brownfield alternatives undermines the ability to demonstrate such circumstances.

14. Main Modification MM460 – Specific Sentences

This section provides a detailed, clause-by-clause critique of Main Modification MM460 relating to Site CH04. The purpose is to assess whether the wording of the modification is sufficient to demonstrate that the allocation is justified, effective, and consistent with national policy as required by paragraph 35 of the National Planning Policy Framework.

It is submitted that the wording of MM460 relies extensively on deferred assessment, unproven mitigation, and assumptions of deliverability that are not supported by evidence. As such, the modification fails to address the fundamental unsoundness of the allocation.

"As this allocation was removed from the Green Belt, proposals should deliver compensatory improvements..."

The wording acknowledges that the site has been removed from the Green Belt but fails to demonstrate that the **exceptional circumstances test** has been properly satisfied. Under paragraphs 140–143 of the National Planning Policy Framework, Green Belt release must be justified through a clear demonstration of need and lack of alternatives.

The reliance on "compensatory improvements" does not remedy the loss of Green Belt. Such measures are secondary and cannot substitute for the requirement to demonstrate that the allocation itself is justified. Furthermore, the wording allows for "alternative improvements" without defining their scope or ensuring equivalence, rendering the requirement imprecise and unenforceable.

"Due consideration should be given to any impacts of flood risk..."

This wording is insufficiently robust. The phrase "due consideration should be given" is discretionary and does not require that flood risk be resolved prior to development. Given the elevated position of the site and the known risks associated with runoff from colliery spoil, a stronger requirement is necessary.

Under paragraphs 173–175 of the National Planning Policy Framework, development must not increase flood risk elsewhere. The absence of a requirement for demonstrated compliance at allocation stage is a significant omission, particularly given the risk of contaminated runoff affecting residential areas below the site.

"Subject to further transport assessment work..."

This clause explicitly defers the question of access. The requirement for "further transport assessment work" indicates that access has not been established as feasible.

Under paragraph 110 of the National Planning Policy Framework, safe and suitable access must be achievable for all users. The absence of confirmed access arrangements at the point of allocation undermines the conclusion that the site is deliverable.

"Contributions may be required to highways improvements..."

The use of "may" introduces uncertainty and fails to quantify the scale of required infrastructure. This wording does not demonstrate that necessary improvements are deliverable or viable.

The transport evidence demonstrates that safe and suitable access cannot be achieved and that the residual cumulative impacts on the road network would be severe. The highway network is already operating at structural breaking point with zero residual capacity, and the addition of traffic from Site CH04, in combination with other allocations, would result in systemic failure. These impacts cannot be mitigated and are fundamentally inconsistent with national policy requirements.

"Development must comply with Policy GS3..."

While compliance with Policy GS3 is required, this clause does not reconcile the inherent conflict between large-scale industrial development and the safeguarding of landscape character.

The site is currently wooded and forms part of the visual Green Belt. The scale of earthworks and building mass required would fundamentally alter the landscape. The wording does not demonstrate how this conflict can be resolved.

"Built development will only take place within the Industrial Zone..."

This clause is materially undermined by the subsequent wording, which acknowledges that:

- access roads
- ground remediation

- land remodelling

will be required within the Local Wildlife Site and Urban Green Space Zones.

This represents an internal contradiction. While development is nominally restricted to the Industrial Zone, the infrastructure required to enable that development extends beyond it. As such, the environmental impact cannot be confined to the designated area.

"Unavoidable harm to the Local Wildlife Site will be kept to a minimum..."

This wording concedes that harm to the Local Wildlife Site is expected. Under paragraph 193 of the National Planning Policy Framework, harm to sites of biodiversity value should be avoided or, where unavoidable, adequately mitigated and compensated.

However, the phrase "kept to a minimum" is vague and unenforceable. It does not define what constitutes acceptable harm, nor does it demonstrate that harm has been minimised through site selection.

"Unavoidable harm must be fully compensated..."

The requirement for compensation is acknowledged but not substantiated. In the case of woodland habitats, particularly those associated with long-established ecological systems, compensation is inherently limited.

Under the Environment Act 2021, biodiversity net gain must be achieved. However, the replacement of established woodland cannot be achieved within a meaningful timeframe. The wording does not demonstrate that equivalent habitat can be delivered, either on-site or off-site, nor does it address the long-term management requirements.

"Explore opportunities to provide ecological corridors..."

The use of the term "explore opportunities" is aspirational rather than mandatory. It does not guarantee delivery and does not provide a clear mechanism for implementation.

Given the acknowledged harm to existing habitats, stronger and enforceable requirements are necessary to ensure that ecological connectivity is maintained or enhanced.

"A buffer is required... minimum 15 metres..."

While the inclusion of a buffer is noted, a 15-metre buffer to woodland, particularly where it is associated with an Ancient Woodland designation, is at the lower end of accepted practice and may be insufficient to prevent indirect impacts.

Furthermore, the effectiveness of the buffer is undermined by the scale of adjacent development and associated disturbance, including noise, lighting, and human activity.

“The site has been identified as having potentially contaminated land…”

This clause confirms the presence of contamination but defers assessment and remediation to the planning application stage.

This is a critical failing. Under Policy ES6 and paragraph 189 of the National Planning Policy Framework, sites should be suitable for their intended use at the point of allocation.

The known presence of contamination, combined with the risks of pollutant mobilisation through runoff and airborne particulates, requires detailed assessment prior to allocation. The failure to provide such evidence renders the allocation premature.

“The site is suitable for employment development”

The assertion that the site is “suitable” is not supported by the evidence base. Suitability requires that the physical characteristics of the site do not present insurmountable constraints or unacceptable risks. In the case of CH04, the presence of colliery spoil, multiple mine shafts, established woodland, and proximity to residential development introduces a combination of constraints that go beyond routine mitigation.

The site contains potentially contaminated materials which, when disturbed, may pose risks to human health and the environment through both runoff and airborne pathways. No detailed geotechnical or contamination assessment has been provided at Plan stage to demonstrate that these risks can be safely managed. As such, the conclusion of suitability is premature and unsupported.

“Constraints can be addressed through mitigation”

This phrase represents a critical weakness in MM460. It assumes that all constraints are capable of mitigation without demonstrating that such mitigation is feasible, effective, or viable.

In particular, the removal of woodland and disturbance of spoil material would increase the risk of contaminated runoff and dust generation. These are not impacts that can be fully mitigated through standard measures, especially given the proximity of residential properties. The interaction between contamination, hydrology, and topography creates a scenario in which mitigation is uncertain and potentially ineffective.

Mitigation should not be assumed; it must be evidenced. MM460 fails to provide such evidence.

“Development will be supported subject to detailed assessment at application stage”

This wording effectively defers critical issues to a later stage in the planning process. However, national policy requires that site allocations are based on robust evidence demonstrating that development is achievable.

By postponing key assessments—such as contamination, stability, hydrology, and ecological impact—the Plan fails to demonstrate that the site is deliverable. This approach is inconsistent with the requirement for plans to be justified and effective.

The scale and nature of the constraints at CH04 are such that they should be resolved, or at least clearly demonstrated to be resolvable, prior to allocation.

"The site will contribute to employment land supply"

While the site may theoretically contribute to employment land supply, this statement does not consider whether the site is necessary or whether it will actually be delivered.

There is already a substantial supply of employment land and premises within Sheffield, including sites that are available for immediate development. These sites are less constrained, lower cost, and more attractive to the market.

In addition, the scale of development proposed at CH04—up to 1,000,000 square feet—does not align with typical market demand, which is predominantly for smaller units. The assumption that the site will contribute meaningfully to supply is therefore questionable.

"The site is deliverable within the Plan period"

This assertion is not supported by evidence. Deliverability depends on a combination of technical feasibility, viability, and market demand.

In the case of CH04, development would require extensive and costly engineering works, including earthworks, stabilisation, contamination remediation, and ecological mitigation. These factors introduce significant uncertainty and risk.

Furthermore, the absence of an identified developer or occupier raises additional concerns regarding the likelihood of delivery. The scale of development proposed would likely require a phased approach over an extended period, increasing the risk that the site will not be fully delivered within the Plan period.

"Environmental impacts can be mitigated"

This statement underestimates the scale and complexity of the environmental impacts associated with the site.

The removal of established woodland would result in the loss of habitat and ecological function, which cannot be replaced in the short term. The disturbance of contaminated spoil material introduces risks of both water and air pollution. Increased runoff may affect residential areas, while dust and particulates may impact air quality.

These impacts are not simply matters of mitigation but raise questions about the fundamental appropriateness of the site for development.

“The site benefits from a suitable location”

While the site may have strategic advantages in terms of location, this does not outweigh the significant constraints identified.

A suitable location must be considered in the round, taking into account environmental, technical, and social factors. In this case, the proximity to residential areas, combined with the risks associated with contamination and pollution, undermines the suitability of the location.

Main Modification MM460 confirms the allocation of Site CH04 but does not resolve its fundamental issues. Instead, it relies on the deferral of key matters to the planning application stage. These include contamination assessment, flood risk, access, and ecological impact.

The wording of MM460 is notably weak, relying on terms such as “should”, “may”, and “subject to”, which do not impose firm requirements. The modification also contains internal contradictions, particularly in relation to the extent of development within and beyond the Industrial Zone.

Importantly, MM460 acknowledges that harm to ecological features is likely but does not demonstrate that such harm can be adequately mitigated or compensated.

The reliance on compensatory improvements does not satisfy the requirement to demonstrate exceptional circumstances for Green Belt release under the National Planning Policy Framework. Compensation is not a substitute for justification.

When read as a whole, MM460 demonstrates a consistent pattern:

- key constraints are acknowledged
- resolution is deferred
- mitigation is assumed rather than evidenced

This approach is fundamentally inconsistent with the requirements for sound plan-making.

The modification does not demonstrate that:

- the site is suitable
- the site is deliverable
- environmental impacts can be acceptably managed

15. Soundness

For the reasons set out in this report, the allocation of Site CH04 fails the soundness tests set out in paragraph 35 of the NPPF. It is not justified, as it is not supported by a proportionate and up-to-date evidence base. It is not effective, as there is no clear prospect that the site will be delivered within the Plan period. It is not justified as there are less constrained and more deliverable alternatives in existence. It is not consistent with national policy, as it fails to address environmental risks and does not demonstrate that Green Belt release is justified.

MM460 acknowledges significant constraints but does not have a delivery system to resolve them. It relies on mitigation without any evidence of feasibility. It defers critical issues to later stages without any evidence solutions. It uses non-binding language that weakens the policy effectiveness by relying heavily on 'should deliver', ' due consideration', 'subject to further assessment', 'may be required', 'explore opportunities'. These phrases do not impose enforceable requirements and fails to ensure that impacts will be addressed. It fails to demonstrate deliverability or viability.

16. Conclusion

The circumstances of Site CH04 bear notable similarities to the well-documented situation at Astley Green Colliery, where large-scale warehouse development has taken place on former colliery and spoil land in close proximity to residential areas. In that case, significant concerns were raised regarding the impacts of construction and operation, including dust generation, disturbance of contaminated materials, increased heavy vehicle movements, and long-term effects on air quality and local amenity. The experience at Astley demonstrates that development on former spoil sites is not only an engineering challenge but also a matter of public health and environmental risk, particularly where residential receptors are located nearby. CH04 presents an even more sensitive scenario, given the immediate proximity of housing at the base of the site and the elevated position of potentially contaminated land above those properties.

Furthermore, the Astley example illustrates that even where such developments are technically achievable, they often give rise to sustained community concern and require extensive mitigation to manage impacts that are difficult to eliminate entirely. In the case of CH04, the risks associated with contaminated runoff, airborne particulates from earthworks, and long-term industrial activity would be experienced by residents within very short distances of the site boundary. This raises serious questions as to whether the allocation is appropriate in principle, rather than simply whether mitigation can be applied. The comparison reinforces the point that locating large-scale logistics

development on former colliery land adjacent to established housing is inherently problematic, and that the Plan has not demonstrated that such impacts can be acceptably managed in this instance.

Site CH04 represents a convergence of significant and unresolved constraints, including contamination, pollutant pathways, ecological harm, engineering complexity, hydrological risk, market misalignment and proximity to sensitive receptors. These issues are inherent to the site and cannot be addressed through mitigation alone.

The transport evidence is unequivocal. Site CH04 cannot be safely accessed, cannot be accommodated within the existing highway network, and contributes to a wider pattern of cumulative failure across the S35 corridor. The identification of structural breaking point and zero residual capacity demonstrates that the network has no ability to absorb additional demand. This is not a matter of mitigation but of fundamental unsuitability. Main Modification MM460 does not resolve these issues and instead defers them, confirming that the allocation is not supported by robust evidence and is therefore unsound.

Main Modification MM460 does not resolve these issues and instead confirms that they are to be addressed at a later stage. This approach is inconsistent with the requirements of sound plan-making. The allocation is not supported by robust evidence and presents unacceptable risks to both the environment and existing communities.

Accordingly, the allocation of Site CH04 should be removed from the Sheffield Local Plan.

Lynda Jackson

CEG Member

REF5.0228

Outlook

Main Modifications to The Sheffield Plan Site NWS31

From [redacted]
Date Sun 2026-05-03 11:35 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

2 attachments (9 MB)
IMG_0311.jpeg; IMG_0312.jpeg;

External email

From: Kerry Hicks
[redacted]

To: Strategic Planning

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

Dear Planning Inspector,

I wish to respond to the Main Modifications to The Sheffield Plan specifically relating to site allocation NWS31 (land between Storth Lane and School Lane S35 0DT). I would like to make the following objections and suggestions to the recommendations:

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

Firstly, I would like you to take 2 minutes of your time to watch this video. This was in the Look Local newspaper and on the front page of the Sheffield Star (I have attached photos). This is my son Franklin Evans. He discusses how your development would affect him due to having autism which is a protected characteristic. I want this email to represent both of our views, but I would like you to hear what he has to say by watching this.

https://www.facebook.com/share/v/18XWs4o4Mn/?mibextid=wwXIfr

Due to Wharncliffe Side Primary School having an integrated resource – one of the only ones in the area - there are a large number of children with disabilities whose families move to the village so that they can get the appropriate provision

I would propose that the main modifications be changed to make it sound and legal by stating 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.

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

Again, for my son and many other children with disabilities who attend the local primary, the proposed changes do not consider access and safety. There would only be one point of access to the site with the

entrance to the village and junction between Dixon drive and Brightholmlee lane already being congested. I was in a car accident on that junction in 2025 and that is without the added traffic that this would cause. My son has a blue badge and always requires parking near our home (75 Don Avenue).

I would propose that the main modifications be changed to make it sound and legal to include:

- A comprehensive traffic assessment to consider safety issues around school and nearby estate roads, parking issues, access for plant machinery, impact on junctions etc.

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

- A thorough assessment of Land Drain and Land slippage/ground issues near the proposed site entrance.

-

BIODIVERSITY *(MM332 condition points 8,9,10)*

Again, please watch the video that appeared both in look local and the Sheffield Star that my son made discussing the biodiversity of this site. I do not feel that the modifications have considered the protected species (bats, owls etc) in the area. Evidence has been provided including 2 videos of owls hunting on the field that I provided myself and are featured in my son's video. There is a well-known bat roost at the proposed entrance to the site.

I would propose the following changes to the main modifications

- A detailed assessment should be carried out for Protected Species that we know are present.

- Mitigations should be included for all identified Protected Species habitats that are identified including suitable buffers and light restrictions.

- Suitable areas of grassland should be retained near the Don Avenue houses.

Although I am commenting on some of the modifications which I believe, as they stand, are unsound and illegal, I urge you to remove Site NWS31 from the allocation completely. I suggest that 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) are developed instead.

I hope that you read this email, watch this video, look at the attachments, and take both me and my son's opinions into consideration

Thank you

Dr Kerry Hicks

Saturday, April 25, 2026

YOUR DAILY LOWDOWN ON LIFE IN SHEFFIELD

The Star



‘DON’T GIVE UP THE FIGHT’

➤ Boy, 12, issues rallying call to protect ‘safe place to play’ green belt land

by James Fletcher

news@thestar.co.uk

@SheffieldStar

A 12-year-old boy has made an emotional plea against plans to build homes on green belt land near his home.

Franklin Evans describes the field he plays in as his ‘safe place’ saying he enjoys its quiet and watching wildlife there.

The youngster, who has autism, has joined protests against plan to build 3,500 new homes on 14 green belt sites in Sheffield.

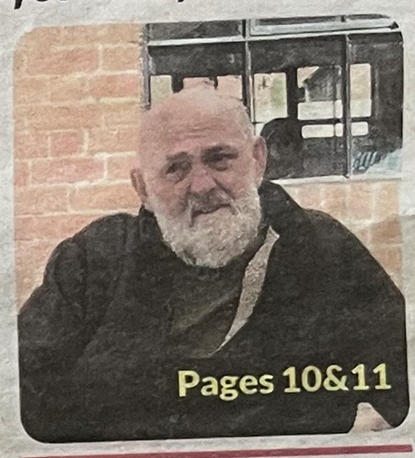
Franklin said the peaceful spaces around his Wharncliffe Side home help him relax and that losing it would make the area ‘too noisy’.

He said he wanted to ask developers why they would ‘take this place away’ and urged them to visit and see its value.

And Franklin also encouraged other campaigners to ‘keep going’ and ‘not give up’ adding: “If you want to keep it that bad, you need to fight for it.”

Special report, 6&7

‘We must try to save city’s past for the future’



Pages 10&11

Heartless and greedy duo help cheat woman out of £23,000



Page 5

£7,000 raised after charity stalwart’s home destroyed by fire



Page 8

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BEHIND THE HEADLINES

‘Don't take away our safe place to play’ - Boy, 12, issues heartfelt plea over green belt housing plans

by James Fletcher
news@thestar.co.uk
@SheffieldStar

A boy, aged 12, has issued a heartfelt plea to those behind controversial plans to build thousands of new homes on Sheffield's green belt.

Franklin Evans, from Wharncliffe Side, has joined a growing band of campaigners fighting against Sheffield Council's plans for 3,500 new homes on 14 green belt sites in a blueprint for development called the Local Plan.

The plan lays out where new homes, jobs, transport links and community facilities should go between now and 2039.

The council says all brownfield plots have already been spoken for, so building on green space is necessary to meet government housing targets.

Campaign groups have been formed across the city to object to the plans.

Joining in now is 12-year-old Franklin, who has issued a heartfelt plea for a re-think.

He has also urged those campaigning against the plans to 'keep fighting', 'keep going' and to not 'give up'.

"If you want to keep it that bad, then you need to fight for it," he said.

Franklin plays on green space in Wharncliffe Side, known locally as the horse field, and he walks his friend's dog there.

It is an area of land between homes on Don Avenue and Glen Howe Park.

He called it his 'safe place'.

The youngster added: "I like watching the birds and the owls hunting as well. I like that it's a quiet place."

He said he feels sad at plans to build on the land.

"This is people's quiet space and with my autism I like quiet spaces and like space to chill out and stuff...and it's quite fun there to be honest," he added.

When asked what he would say to developers and planners about building on the city's green belt, he added: "I am wondering why you would take this place away, it's a safe place and I think they should go there and see how good it is and see what they're taking away and see they're taking everyone's safe place away that lives here."

In a plea to other campaigners, he added: "Keep going and not give up because if you want it to keep it that bad you want to fight for it. You need to fight for something if you really want it.

"I wouldn't want to live here if they build houses here because it would be a bit too noisy for me."

Wharncliffe Side resident Julie Harris, 62, also objects to housing plans for the same field.

"We use the field as a community – we have sledged, walked and played in the field as a community," she said.

"During covid it was a great place to meet at a distance, I see lots of people every day use this field, either walking their dog, getting down to the bus stop or coming home from school.

"It's great for nature walks, I've seen schools use this route for nature walks, the local Brownies come to see the bats and owls flying around. Lots of people use this field and lots of people will be upset if it goes."

Julie also believes that access to the field in the village is the safest route for children and people to get to and from Glen Howe Park.

"We're away from the road, it's open – people can see you. The other routes would involve crossing major roads that are very dangerous around here, there's no crossings on that part of the road. It's not a place I would like my children to have to use," she said.

Jo Tunstall moved to nearby Chapeltown in 1997 and chose it for its wide open green spaces and strong sense of community.

14
green belt sites are set to be built on



Green belt development sites are concentrated in the north and south east of Sheffield, a city council map shows

> *I am wondering why you would take this place away, it's a safe place and I think they should go there and see how good it is and see what they're taking away*

"This plan does not serve our community, instead the plan burdens our community to the point where we have two options – fight or flight," she said.

"Flight would be the easy option, but I cannot stand by and watch the Sheffield City Council rip the heart out of our community, take livelihoods away from our farmers and kill off our wildlife so I choose to fight."

Explaining the need for the Local Plan and new homes, council leader Tom Hunt has said: "Sheffield needs a Local Plan because we are a growing city.

"Having a Local Plan means control over where development happens and what gets built. But growth needs to be inclusive, and the Plan will bring real benefits for communities. It will help us to provide more affordable housing, regenerate derelict land, create new jobs, improve public transport and reduce our city's carbon emissions.

"The Plan has a clear focus on developing brownfield land that has already previously been built on. It is a long-term plan and the majority of development won't happen until the 2030s.

"The Plan means that more housing developments will have to include affordable homes. It means ensuring that developments have the right infrastructure like public transport, children's playgrounds, schools and health services.

"Continuing without a Local Plan means remaining at risk of speculative, unplanned development and developments built without any infrastructure and without affordable housing. This would be a failure and it is not what communities need."



Franklin Evans, 12, playing in the green space near his Sheffield home



A green belt site in Chapeltown, S35, earmarked for warehouses in the Local Plan



Green belt campaigners in Handsworth

Campaigners hopeful for Local Plan re-think to save green belt from housing

Protesters are hoping for a rethink over proposals for 3,500 houses on green belt land in Sheffield.

They hope the city's controversial Local Plan will go back to the drawing board after local elections.

It is a year since Sheffield Council unveiled a shock blueprint for development called the Local Plan.

It contains a government target of 38,000 new homes, and 654 acres for business, by 2039.

Sheffield Council says 89 per cent – more than 33,000 homes – would be on brownfield sites.

But it is not enough. And this shortfall has led to proposals for 3,529 houses and 130 acres of employment land – as well as three schools and two graveyards – on 14 sites in green belt.

Cheryl Hague, of the Save S13 Green Belt campaign, said: "The big thing is the elections. That is the way people can show how they feel about the green belt.

"We think the Local Plan should go back to the drawing board. There is still a lot to play for.

"Inspectors haven't listened to us at all. I am thoroughly disappointed. But the fight is not over."

If given the go-ahead, it would be the biggest loss of green belt ever in Sheffield, some 3.6 per cent – 809 acres – of the total 22,390 acres.

But it is not just the loss of protected land, it is the locations – with two postcodes particularly hard hit.

In S13, Handsworth is earmarked for 1,638 houses on two sites, 49 acres for business, a secondary school and graveyard.

In S35, Grenoside could see 945 homes across three sites, a secondary school, special needs school and graveyard.

Chapeltown and Ecclesfield, also in S35, would bear the brunt of development for employment land, with three proposed sites – as well as 549 homes.

In contrast, the "wealthy west" of the city will be virtually untouched, with Dore set to get just 82 homes and Lodge Moor 258.



Green belt homes protesters at Sheffield Town Hall

The announcement a year ago mobilised thousands of people who feared the loss of much-loved green space and wildlife, and strain on services and clogged roads.

The protest movement has evolved into a 'supergroup', the Green Belt Alliance, with expertise, enough funds to hire a barrister, a petition, and celebrity backing from Sean Bean.

The Hollywood superstar is appalled at the potential loss of fields he used to play in as a lad.

Following public consultations in autumn – which drew more than 3,650 overwhelmingly negative comments – government inspectors said the plan was 'sound' apart from minor amendments.

They include 82 fewer homes in Grenoside and a reduction of 41 houses in Handsworth. Public consultation on these modifications closes on May 5.

Sheffield Council said the inspectors would review submissions before a final report is delivered to councillors. It will be considered by the strategy and resources policy committee before a final decision at a full council meeting.

Adoption of the Local Plan is expected by the end of autumn.

Clive Betts, Labour MP for Sheffield South East, which includes Handsworth, has been an outspoken opponent.

He said the proposals were a 'monumental disservice to the communities who will be burdened with yet further development, with no significant improvement to the surrounding infrastructure'.

He added: "At the same time, affluent parts of the city have little to no encroachment on their green belt where many people want to live, but cannot afford to with no increase in housing supply there.

"Let me be blunt. This plan is wrong, it is unfair, and the council must oppose it."

Once – if – the Local Plan is in place, it is likely proposals from housebuilders will come forward quite quickly. Green belt is easy to develop compared to brownfield, which may be contaminated and still have buildings and foundations.

But it will be years before the first brick is laid and campaigners will get more chances to object.

Last year, Coun Douglas Johnson set out the steps.

He said: "For these big sites, there should be a 'masterplanning' stage where it will be important to have community involvement.

"Ultimately, a developer will produce a planning application. Only when that happens will we see exactly what is proposed for the sites.

"This has to include widespread public consultation and another chance for people to object to the specific plans."

REF5.0229

Outlook

MM411:Objection to Proposed Development in Handsworth

From [redacted]
Date Sun 2026-05-03 11:53 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Sir/Madam,

Re: Objection to Proposed Development on Green Belt Land in Handsworth, Sheffield

MM411

I am writing to formally object to the proposed development on Green Belt land in Handsworth.

This area of Green Belt is highly valued by local residents and plays a vital role in maintaining the character, environmental balance, and wellbeing of our community. The loss of this land would have a significant and lasting negative impact.

Firstly, the effect on residents' wellbeing cannot be overstated. Access to open green space is essential for physical health, mental wellbeing, and quality of life. Removing these spaces would deprive the community of an important natural resource that is used daily for recreation, relaxation, and family activities.

Secondly, the development would have a damaging impact on local wildlife. This Green Belt land supports a range of habitats and species, and building on it would lead to habitat loss and disruption to biodiversity that cannot easily be replaced.

In addition, the proposed development would place further strain on already overstretched local infrastructure. Schools in the area are already oversubscribed, and local GP surgeries and dental practices are under significant pressure. An increase in population without a clear and deliverable plan for expanding these services will only worsen access for existing residents.

Traffic and transport are also serious concerns. The surrounding road network already experiences congestion, and additional housing would inevitably lead to increased traffic, longer journey times, and reduced road safety. This disruption would affect both residents and local commuters on a daily basis.

I am also deeply concerned that continued development in this area risks removing the remaining green spaces entirely. There is a real fear that this proposal is part of a broader pattern of development that will permanently alter the character of Handsworth and erode the Green Belt beyond recognition.

Green Belt policy exists to prevent urban sprawl, protect the countryside, and preserve the identity of communities. This proposal appears to conflict with those principles and sets a worrying precedent for future development.

For these reasons, I strongly urge the Council to reject this proposal and to protect this vital Green Belt land for current and future generations.

Regards

Adele Lonsdale

REF5.0230

Outlook

Objection to building on the greenbelt land

From [redacted]
Date Sun 2026-05-03 11:59 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

1 attachment (596 KB)
1000069559.png;

External email

Good morning,

Although I have previously shared my thoughts opposing the decision to build on our green spaces and greenbelt land. I recently saw a photograph which has encouraged me to make a final plea before the consultation period ends on Tuesday.

Once we build on our greenbelt land, we lose it forever. We all know greenbelt land is protected for many reasons. I also understand that Sheffield City Council will be under extreme pressures to provide the land for additional homes and employment opportunities in the area however we must not use our green spaces.

These green spaces already contain residents. These green spaces are the homes to thousands of creatures, great and small. We have no right to remove their homes. We have no right to rip our their habitats and replace them with concrete.
Anyone who lives in the area of S35 will see the vast number of animals who call these areas their home. Deer, foxes, badgers, insects, birds, rodents, hedgehogs and many more.
Our area is rich in wildlife and removing their habitats and food sources will have dreadful results.

We are living in a time of climate breakdown. We should be doing everything we can to protect the environment we have. Planting more green spaces, encourage more wildlife and insects to the area, providing homes for creatures great and small to restore some of the balance. We should NOT be causing further disruption to our ecosystem.

I have attached the photo to my email. I hope it hits home as to who's homes you will be destroying. I hope it makes you reconsider the land you are hoping to build on. I hope it makes you realise we can stop things like this happening in the future.

Thank you for taking the time to read my email.

Many thanks
Josie Saddington

[redacted]

[redacted] Join

I'm not exactly sentimental but having watched deer wandering around happily on the fields for years then seeing two young deer behind the fencing wandering around the new build site on Blackpool Rd it makes you realise what we are losing.

Appreciate new homes have to be built but there comes a point where local communities need to be properly consulted with and not just via objections (which are always ignored at government level).







REF5.0231

Outlook

Objection to MM411 SES30

From [redacted]
Date Sun 2026-05-03 12:36 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

[redacted]

Having read through the modifications proposed for SES30 Bramley/Beaver Hill Fields, we consider it unsound to release the site from Green Belt and it should be rejected in full.

MM411 requires all traffic to use access from Beaver Hill Road, which will direct all vehicles through Handsworth or Woodhouse, both areas are already subject to severe congestion. Adding to the traffic heading up Retford Road and onto Handsworth Road will cause Handsworth Grange Road to be used as a 'rat run' in an attempt to avoid congestion. This pushes traffic past two schools (one secondary, one primary); more traffic = more pollution, more congestion, more accidents. The access for a site this large has not been demonstrated to be safe.

The Bramley/Beaver Hill Fields have been used for centuries as arable land. There has been no evidence provided to show that this is poor quality soil, and indeed the requirement to conduct soil surveys (MM184) has been removed. There are more suitable poor quality soil areas available that will not impact food securing by destroying high quality arable land.

The Environment Act requires a 10% net gain in biodiversity to be achieved for the removal of green belt. The Council has not shown how this can be achieved. Indeed their own ecological assessment indicated that there was a potential for national biodiversity schemes rather than development. In addition no protected species surveys were conducted before the land was allocated for development.

In summary, we believe that the site should be removed from the plan and the land kept as Green Belt.

Kay & Peter Smith

[redacted]

REF5.0232

Outlook

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

From [redacted]
Date Sun 2026-05-03 1:22 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

[redacted]

Dear Strategic Planning Team,

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

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

I therefore set out below my objections to specific modifications.

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

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

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

This represents a substantial proportion of housing delivery being dependent on

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

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

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

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

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

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

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

MM20 -The phrase “wherever practicable” is unacceptably ambiguous in a policy area

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Joe Dunn

REF5.0233

Outlook

Feedback on Sheffield's Local Plan

From [redacted]
Date Sun 2026-05-03 1:29 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>
Cc [redacted]

External email

We would like to share our disappointment and dismay at the Planning Inspectorate's decision regarding the Council's current proposal, which was taken forward as originally proposed except a few minor changes, therefore ignoring feedback from the people of Sheffield.

This was particularly concerning for us as they didn't respond to the issues raised by residents from Sheffield 13, for example: explaining the challenges we had raised facing the sites, or respond to the alternative sites that are available and more suitable. In addition we raised that there is a huge inequality in green belt housing building planned in the East of Sheffield compared to the West, which has not been explained. This will be unmanageable on roads which are already congested, and will just worsen what is already a significant difference in health outcomes and life expectancy for residents in the East of the city compared to those in the West, as pollution levels which are already high will worsen further.

We are really concerned about the future for our grandson, and the impact on his health and wellbeing if he does not have access to this green space, to learn about British fauna and flora. The detrimental impact of the increased traffic on his health is really terrifying as we do not know what the long term effects will be.

It seems clear that this isn't a meaningful consultation, as neither the council or Inspectorate have properly considered alternative views or options. In addition there was not clear notification of the first consultation to allow all residents to have a voice.

Disappointingly, this appears to be a fait accompli, as contractors had already bought property which would need to be removed in order to deliver the plan for the site off Orgreave Lane, well before the consultation began and they've also been completing preparatory works.

We understand the need for new housing, but it should be fairly distributed. We advocate for the use of brownfield sites and more equitable distribution of housing developments across Sheffield, rather than concentrating them in areas, such as S13. Particularly as this just puts an area that is already congested under an additional strain that the roads cannot mange, they are already clogged and potholed. have you tried driving down Handsworth and Retford Road during peak times, traffic is at a crawl, at best. This is before your proposed additional housing.

In addition, we expect that not only will we see worsening health outcomes from increased congestion and lack of access to green space, but also expect increased crime and anti social behaviour.

We believe that our green belt land should be preserved for future generations. Once this catastrophic decisions is made and our green belt destroyed it cannot be replaced.

We need spaces for recreation and mental wellbeing, we are further away from these spaces than other areas of the city that you could develop (who are close to the Peak District and other green space) but you have clearly already decided against developing. Is this because you think the people on the West of the city are wealthier and therefore will be better able to fight any development proposal, and so you thought you'd just concentrate everything on the East side.

We are shocked that you would propose a plan about housing which is clearly unfair to one side of the city and would detrimentally impact on a range of other indicators, which are already much poorer performing on the East side. This seems to demonstrate that you do not care about or listen to all of Sheffield's residents.

We recognise that the council must create additional housing but do not understand why this is not through the utilisation of repurposing rundown/derelict housing and the use of brownfield sites that have been identified, and would ask that the sites that have been submitted by members of the public and groups who have concerns about this plan are reconsider as a matter of urgency.

In addition we ask that you look at more fairly distributing the housing across the city to ensure that the pressures on roads and services are also fairly split across the city, recognising that we are already and still dealing with (since spring 2012) the building and residential traffic of the Waverley Estate.

Kind regards,

Lee and Nicola Talbot

Sent from my iPad

REF5.0234

Outlook

Modifications reference (MM411 Bramley/Beaverhill & MM410Flockton/ Handsworth)

From [redacted]
Date Sun 2026-05-03 1:31 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Planning Objection –Sites SES30 & SES29 . Modification reference (MM411 Bramley/Beaverhill & MM410Flockton/ Handsworth)

I am writing to object to the proposed allocation updates of MM411 & MM410 for housing.My reasons for this objection are stated below:

At a basic level, this proposal does not seem justified when looked at in common-sense terms. The site is known to be affected by surface water flooding and local drainage problems. This means that during heavy rain, water can build up on the land and struggle to drain away properly. Building new homes in an area with known drainage issues increases the risk of flooding to future residents and could make existing problems worse for surrounding properties.

National planning policy, set out in the National Planning Policy Framework, is clear that development should be directed to areas at the lowest possible risk of flooding. In simple terms, councils should avoid building on land that is prone to flooding if there are safer alternatives available elsewhere.

In this case, there is strong reason to believe that safer alternatives do exist. Sheffield has many previously developed ("brownfield") sites, such as disused industrial land and empty plots within the urban area, which are generally at lower risk of flooding. These sites should be prioritised before releasing undeveloped Green Belt land like SES30 & SES29 Releasing greenfield land when brownfield options are still available goes against the basic principle of using land efficiently and protecting the countryside.

It is also important to consider that the issue is not just whether brownfield sites exist, but whether they are being fully used. Many such sites could accommodate more housing if developed at higher densities or brought forward more effectively. Simply choosing an easier greenfield site instead does not mean that better alternatives do not exist.

Green Belt land should only be released as a last resort, when all other reasonable options have been exhausted. In this case, that has not been convincingly demonstrated. The presence of other potential sites within the city suggests that this step is premature and unnecessary.

While the development may help meet housing targets, this alone does not justify building in a location with known flood risk concerns, especially when safer and more sustainable alternatives appear to be available.

For these reasons, the proposal does not properly follow national planning guidance and cannot be considered sound. It fails to show that lower-risk sites have been fully explored before selecting this location, and it places development in an area where flooding and drainage are already recognised issues.

I therefore strongly object to the allocation of Site SES3O & SES29

Modification reference MM411 & MM410

Yours sincerely

Angela Cooper

REF5.0235

Outlook

Main Modifications Objection submin

From [redacted]
Date Sun 2026-05-03 2:07 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

1 attachment (624 KB)
Main Modification Consultation CH03 Godfrey2 edits.docx;

External email

Dear Sirs

Please find attached my letter of objection to the Main Modifications, with particular reference to the CH03 Warren Lane proposed development

Regards

Godfrey Pell

G. Pell
[redacted]

3rd May 2026

Main Modification Consultation CH03 (Warren Lane)

Foreword

The main thrust of this document is to comment on the modifications to the proposed industrial development to the north of Warren Lane (CH03), however before I address these issues, I feel that there has been an abuse of process, which I propose to discuss first

1. Process Issues.

a. **Gunning principles:**
In my previous letters I have criticised the lack of adherence to the Gunning principles, Sheffield council, despite having a well-resourced communications department of approximately 30 full time posts, did very little to advertise the Sheffield Plan, leading to a lack public awareness. The raising of public awareness was down largely to volunteers.

b. **Timescale:**
The time scale was the legal minimum, and nowhere near enough to undertake meaningful consultation on such an important issue affecting the whole S35 community. Letters from the planning inspectorate suggested that they would have been amenable to extending the consultation period, Sheffield Council made no such request.

c. **Consultation on Local Plan:**
After releasing the local plan, the Council released over 300 examination documents containing revised data. This was not the draft plan that was the basis of local consultation, *nor was it the plan on which local councillors were asked to vote.*

d. **Need for greenbelt development:**

i. **Housing** Paragraph 18 (Demographic and Economic Modelling) of the stage 2 post hearings Inspector's letter, would require a growth rate of double the national projected growth rate for Sheffield, this would suggest that the need for the volume of the council's projected housing need is less than stated; it cannot therefore lead to the exceptional need for the loss of greenbelt.
ii. **Industrial** Here the council has failed to consider the vacant industrial sites, and buildings both in the area. Again paras 18 & 19 suggest the requirement for industrial provision is overstated, and would unsustainable for inward commuting.
iii. **Stated Sheffield Council Policy of Brown Field First.** The Chapeltown, Ecclesfield and Grenoside Group has identified brownfield sites whose combined area (200+ hectares) exceeds that of the proposed greenfield take, the councils reasons,1) the majority of these are windfall sites, *not true* and 2) they don't have the staff, which is difficult to believe.

e. **December 2025 Consultation:**
On 31st December, approximately 2500 were submitted to the planning inspectorate, the letter of response from the inspectors was dated 16/01/26*, it is not possible for the inspectors to have read the submissions and prepared their response.* It is obvious that the majority of submissions went unread, and that the response letter with modifications was prepared some time in advance, this is a significant abuse of process.
    i. Furthermore, some submissions, although received on time, were not forwarded to the inspectors. One such was the submission by M/s Jo Tunstall (committee member of the Chapeltown, Ecclesfield & Grenoside Group) which was highly detailed, comprehensive and well written containing many salient points, this is a further abuse of process.

f. **Scope of current objection:**
CH03 cannot be assessed in isolation, as it is part of a cluster of proposed developments in S35, which will together adversely impact on traffic congestion, drainage and flooding, medical and dental amenities etc, and together would form an arc or urban sprawl along the boundaries with adjacent authorities. The full impact of these proposed developments (CH03, CH04, CH05, NES37, NES38 & NES39) would only become obvious if the proposals were to be considered together, such a restriction is an abuse of process.

I would, therefore, suggest that the above taken together would indicate an unsatisfactory process.

2. Formal objection to proposed CH03 development, including the "Main Modifications"

a. Residential impact:

i. The site consists of rising ground, currently used for grazing. It overlooks existing residential properties especially on the northern side, because of the elevated nature of the ground it is difficult to see how the industrial development could be effectively screened. The impact on the Top Warren cottages and bungalow would be substantial, making them uninhabitable. Figure 1 below shows the proposed CH03 development.

ii. Even with the buffer zone this development would overshadow the residential properties in conflict with NPPF para. 191

iii. In my experience developments of this kind have lights blazing all night, and the comings to and fro, especially the distribution premises would lead to noise and light pollution likely to be injurious to health, in contravention of the Council's own environment protection policy.

iv. Finally Warren Lane is about 200 metres from the M1 motorway, so extra levels of traffic based pollution would be undesirable.

b. Acces to the site (public transport and highways)

i. Modern planning recommends 20 minute neighbourhoods, leading to a reduction in the use of private cars; this development is right on the northern edge of Chapeltown/ Sheffield leading to high levels of commuting.

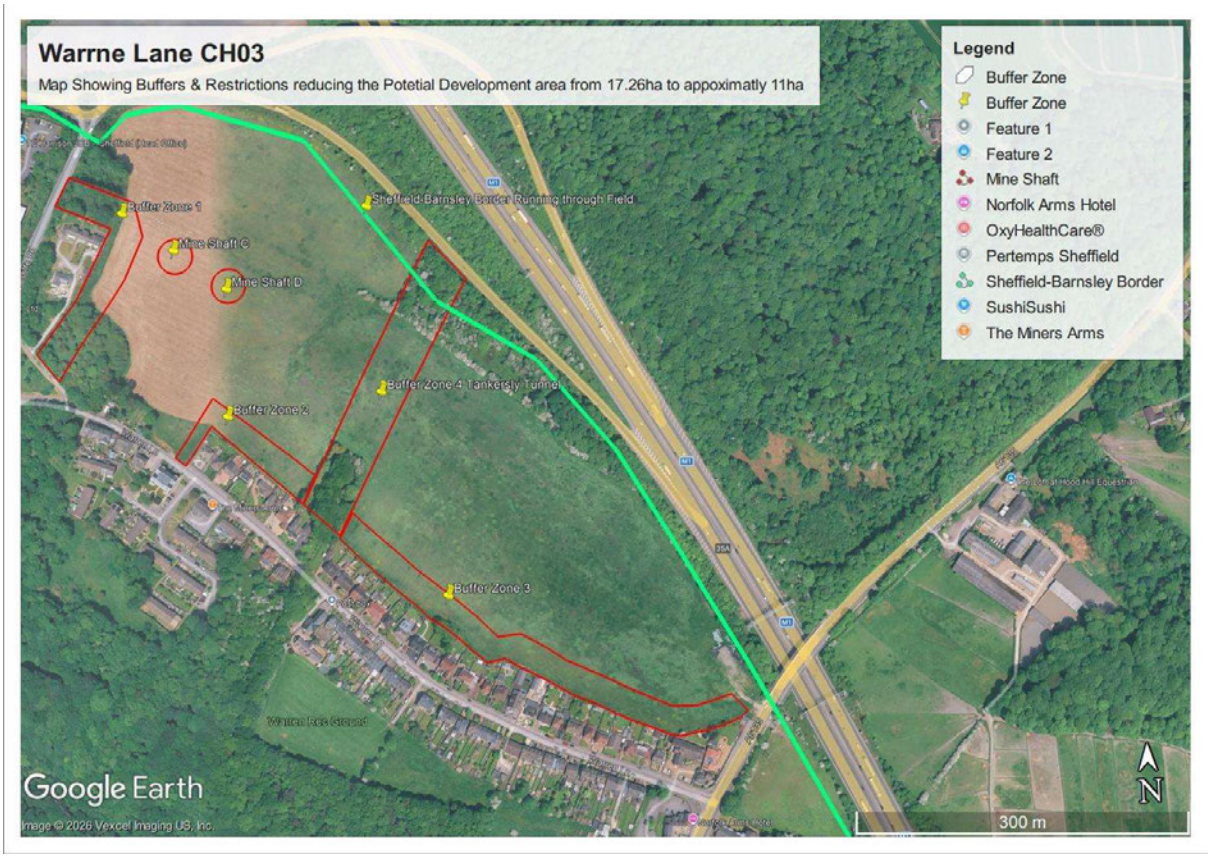


Figure 1 Warren Lane (proposed development is outlined in red)

(When I was a young man I knew many people who worked for Newton Chambers, now I know just one, whilst I cannot claim that this is representative, it is at least indicative of the level of commuting.

ii. **Private Transport**: This is likely to the choice for most people as it is for Braun, M & S, JCB etc. on Brookdale.

iii. **Public Transport:** This is limited and unreliable.
Service 35 makes 12 journeys (when it turns up) between approx. 06.00 and 18.00.but only 3 on Saturdays the nearest bus stop for this is approx. 200 metres distant, with no foot path.
Service 201 this makes approx. 10 journeys per day at irregular intervals between approx. 07.00 and 18.00 Monday to Saturday, the nearest bus stop is over 500 metres distant down quite a hill, with no foot path for half that distance, in bound services are frequently delayed due to traffic queues on the A616.
Service 2/2a these services run past the east end of Warren Lane, at approximately hourly intervals from about 05.30 to 22.00 approx 20 services in total, less at weekends. The railway station is about 2km distant in the valley. From the above it will be seen that public transport is not a convenient option.

iv. **Cycling.** This development is situated at the top of quite a hill, whichever way it is approached. The trans-pennine cycle route

although passing close by, mostly runs east/west and will add little to the sites accessibility.

v. **Walking** There are no footpaths on Thorncliffe Road north of Warren Lane (about 200 metres) The road is a long climb, and is quite busy with traffic, but because of no houses fronting onto the road, it is quite lonely from the pedestrian view point. It is not comfortable for lone women at night

vi. **Traffic along Warren Lane** Warren Lane is currently used as a rat run, for drivers seeking to avoid the congested M1- A61- A6135 – A6195 road junction; also private motorist seeking to avoid the speed cushions and the lower stretch of Thorncliffe Road. The Council introduced some mitigation measures, viz. 20mph speed limit, 7.5 tonne weight limit and a oneway system for the narrow section to the west of Warren gardens. As these measures are not policed, their effectiveness is limited. If the CH03 proposal goes ahead some of this traffic will use Warren Lane adding to the already unsatisfactory situation. The Lane is highly unsuitable for high volumes of traffic because the high levels of on street parking (the south side consists largely of terraced properties) ; about halfway along the lane there isa gentle bend, on street parking obscures the vision of car drivers of oncoming vehicles.

vii. **Traffic flow modelling** I understand that the CEG Group has commissioned traffic surveys in the area, with existing and project traffic flows, they make stark reading, they will be presented in full in the CEG Group submission. Suffice it to say that the existing roads are at capacity, and an increase in traffic has safety implications, especially on the M1 slip road exit at junction 35A, with tailbacks impinging on the traffic lanes.

c. Ecological issues.

i. Wild life: This site supports a variety of wild life such as skylarks, kestrels, shrikes, magpies and owls among the bird life, and bats, badgers, small deer etc. amongst mammals (We occasionally get bats in the house, which I have to catch and liberate). It is difficult to see how the CH03 proposal can maintain the current levels of biodiversity. Wild life corridors will be of little help, when one considers the arc of other proposed developments alongside the M1.

ii. Flooding: Flooding has been recognised as an issue which requires attention. So far there has been a lack of robust evidence that the risk of flooding has been properly addressed. The cumulative effect of this proposed development and the cluster of other developments, will exacerbate flooding in the Blackburn Brook valley and Ecclesfield park (which regularly floods) I have lost count of the number of times that the Met. Office has issued flood warnings for these locations. Clearly

addressing the flood risk on a per site basis rather than aggregating the risk resulting from all the adjacent proposals is an abuse of process. Also failure to address this issue is in contravention to the NPPF paras.158-175.

iii. **Water Supply** This year we have had 132 days of water usage restrictions, with more extreme weather occasioned by global warming, how will future supplies be maintained, in in light of the planned developments? To the best of my knowledge Yorkshire water has no plans for increased storage capacity.

d. Site limitations

i. **Mining:**

The CH03 site is situated in the middle of a coalfield, there were coal mines all around, eg. Thorncliffe drift ,Cherry Tree mine, Pilley pit, Barley Hall, Thorpe pit, Skier Spring etc all within 3 miles of the site. Because of the early industrialisation many bell pits were dug (see Parkin Wood a site of Scientific Interest just south of Warren Lane). The next stage was small mines with vertical shafts, not too deep with galleries running off, most of these went unrecorded, however there are 4 old mine shafts recorded on the proposed development site. When the M1 motorway was built they encountered a number of unrecorded mine workings in the vicinity of Warren Lane, similar fairly shallow workings were encountered on the development of the housing to the west of the old Midland railway siding; undoubtedly these exist in the area of CH03.

Just WWII the coal seam close to the surface on the norther side of Warren Lane was extracted by the open cast method of mining. When the land was reconstituted all sorts of industrial waste were dumped in place of the extracted coal, so it is highly likely that when the site is levelled to facilitate development, then contaminated material will be found. How will this be removed without health risk to the nearby residents?

ii. **Modications** The inspector's modification to the proposal require the following;

1. A buffer zone from the housing
2. Retention of hedgerows
3. Wild life corridors
4. Removal of the triangle of land adjacent to the old peoples nursing home (Warren Park).

iii. **Other limitations**

1. Tankersley Railway tunnel, which bisects the site from north to south, and cannot be built over.

2. National grid high tension power lines.
3. Limited Site access.

iv. **The effect of the limitations.**
Taken together these limitations reduce the area available for industrial development to approximately 11 hectares. So reducing the economic value of the development.

e. **Green Belt Issues.**
   i. This is high scoring green belt **(17)**, it is situated on the Sheffield / Barnsley boundary, and is therefore essential in preventing settlement coalescence.
   ii. The Sheffield plan considers this and other sites individually, (CH04, Ch05, NES36, NES37, NES37 NES38 &NES39). These proposed greenbelt development sites create an arc along Sheffield's north eastern boundary, resulting in a continuous loss of greenbelt. The effects of these sites is cumulative, so failure to consider the cumulative effects of these developments is an abuse of process.
   iii. In the past Sheffield Council has stated that developments will be focused on brown field sites, the CEG Group has identified approximately 200 hectares of brownfield sites, So clearly the CH03 is inconsistent with these aims.

3. **Conclusions**
   a. **Overall Plan (Section 1)** The entire plan should be revisited due to the unsatisfactory implementation of process
      i. Failure to observe the Gunning principles, short time scale, failure to properly advertise the plan.
      ii. Consultation 300 or so documents were referred to with no summary accessible to the public, it is also probable that the substantive Plan was different to the Plan voted on.
      iii. The council has not justified the need for the proposed developments.
      iv. The plan goes against the stated policy of Sheffield Council, in that brownfield sites have not been fully considered (over 200 hectares of brownfield sites exist within City boundaries).
      v. Failure to consider all 2500 submissions sent in last December, 16 days is insufficient time to assess all the sbmissions and formulate a considered response.
      vi. Failure on the part of Sheffield Council to forward all submissions together received on time.
      vii. The scope of the current objections, clearly the cluster of proposed sites will have aggregated adverse effects on infrastructure and the local ecology.

b. **CH03 Warren Lane proposal**
    i. **Adverse Residential impact** as set out in in section 2.a.
    ii. **Access & transport** The impracticability of site access as set out in section 2.b.i-v.
    iii. **Adverse traffic on Warren Lane** as set out in 2.b.vi together with general traffic flows in the area 2.b.vii
    iv. **Adverse effect on ecology**
        1. Adverse effect on wildlife, 2.c.i
        2. Flooding and water supply issues 2.c.ii & 2.c.iii
    v. **Site limitations**
        1. **Coal extraction and its aftermath (2.d.i)**
            a. The presence of old recorded and unrecorded mine workings.
            b. Contaminated soil due to post opencast land fill
        2. Inspector's modification, 2.d.ii and 2.d.iii effectively reduce the area available for development to 11 hectares and hence reduce the viability of the site.
    vi. **Greenbelt issues (2.e)** The main objections, being no proof of exceptional need, continued development up to the northern boundary, this is especially important when considered in conjunction with the Hesley Wood and Smithy Wood developments.

The above clearly states my objection to the Plan in its entirety, but failing that my objection to the CH03 Warren Lane development.

Also I would clearly like to register my support for the work undertaken by the Chapeltown, Ecclesfield Grenoside Group, and endorse their submission

Godfrey Pell



REF5.0236

Outlook

MM411

From [redacted]
Date Sun 2026-05-03 2:08 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

To whom it may concern
I wish to express my concern regarding the removal of green belt in S13 Handsworth
The government is constantly stressing that our mental health is so important and that being in nature improves it. Surely it is better to be able to obtain nature and all that it offers whilst on foot and not having to rely on transport of any kind adding to pollution.
In S13 Handsworth we are fortunate that we have nature in abundance available to all regardless of age, culture, disability on the two sites listed to be removed by the local plan
Please reconsider this decision and spread the planned building of new homes fairly across Sheffield in those areas where none or very little building is planned
With thanks
Alison Bloodworth
Sent from my iPad

REF5.0237

Outlook

Land - Horsefield NWS31

From [redacted]
Date Sun 2026-05-03 2:16 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

I'm sending this email in response to the main modifications for proposed site NWS31 in the Sheffield local plan.

Flood Risk (groundwater) Ref. MM332, condition 4

The site is on a considerable slope and this field currently provides important water storage to stop/slow water flowing into the river at the bottom and on into the River Don near Main Road – acting as a natural flood defense. I understand Yorkshire Water are already planning to CPO a site in Wharncliffe Side due to the considerable flow of water into the River Don already. If this site was hard surfaced due to housing this would mean all the rain currently retained in this field would immediately flow into the river at the bottom of the field and River Don causing further flooding issues.

Several hundred trees have also been recently planted on the site (I understand by the Environment Agency) in order to help reduce and slow water run off from the field. Development of this field for housing would therefore seem **not to be a sound approach** as it counters existing environment agency policies.

Biodiversity. Ref. MM332, condition points 8,9,10

I believe the environmental impact of development on this site would be unacceptable from a flooding/surface water point of view The site is also a haven for local wildlife with numerous species of animals, birds, butterflies and wild flowers plus native trees, along with hedgerows which many animals, birds and insects call their home. These include bats, frogs, hedgehogs, owls, visiting badgers and foxes. **Indeed a local planning application on an immediately adjacent site was recently refused partly due to the presence of bats.** Therefore the development of this site would **not appear to be sound** from a protected species point of view.

Loss of amenity of Green and Open Space. Ref MM332, conditions 1,3

The site is widely used by the local community (with people walking around it – some with their dogs, and others walking across it to access the play area in Glen Howe. There are currently a number of public footpaths running across the site which enable people to exercise safely in a traffic free environment and encourages good health in the open clean air. I understand these public footpaths would lost, with no access across the field during construction (stopping people accessing Glen Howe play area), but once the housing was complete a green space and walk in the countryside would be replaced with a walk through a housing estate on a pavement with dangers for young and old people alike taking their exercise on a public highway. This green space which is currently an asset of community value for exercise helps to keep the local population fit and healthy.

Kind regards,

Caroline Nokes

REF5.0238

Outlook

Objection to Sheffield plan

From [redacted]
Date Sun 2026-05-03 2:27 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

I object to this plan anyone knowing the area knows it is unsound on a few reasons, living in this area since the early 70's I have seen loads of changes and the volume of traffic has been considerable but that is to be expected with lifestyle changes, but this plan I believe does not take into account to account of the massive impact this will have, the local roads in the proposed housing estates will be no problem but the local arterial roads will remain the same but a massive difference in volume and this is already a nightmare particularly during rush hour, you only have to look at town, daily reports are saying delays on Derek Dooley way and this is a major route so this local area will be horrendous.

The more you look at the plan the more out of balance it is and disproportionate to the area and is just not fair on the area and clearly is not sharing the land out over many areas but concentrating the bulk in this area.

I have concerns that if this gets approval we may be faced with the worst of all consequences, it's possible that work could start and the start of building on the green belt and down the line with the lack of current building despite labours quoted build rates we could have an alternative government that disagrees with labours policy on Green belt we could find this planned cancelled but as the work would have been started the devastation caused would be for nothing.

I hope some breathing space can be put in to this scheme and allow time for alternative brown field sites to be identified that are still unidentified in my opinion and a more proportionate allocation to other areas within the Sheffield area.

It may be too late in my lifetime but with age comes experience and in my experience this is a decision that will impact for generations to come and no opportunity to reverse.

Thank you for your time in reading this

Best Regards
Cheers Keith Boldock

Sent from my iPhone

REF5.0239

Outlook

Objection to Modification MM411 – SES30 (Bramley / Beaver Hill Fields)

From [redacted]
Date Sun 2026-05-03 2:39 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Sheffield City Council,

I am writing to formally object to Modification Reference MM411 concerning the proposed release of land at Bramley / Beaver Hill Fields (SES30) from the Green Belt.

I consider this modification to be unsound and unjustified for several key reasons:

First, the transport implications of this proposal are deeply concerning. The development would require all traffic from approximately 827 homes, in addition to a school and burial ground, to be routed via Beaver Hill Road. This road already experiences significant congestion and presents safety concerns. The plan suggests that access would be "subject to further transport assessment," which indicates that safe and suitable access has not yet been demonstrated for a development of this scale. Proceeding without clear, evidence-based transport solutions is irresponsible.

Second, the environmental impact has not been adequately addressed. There is no convincing evidence that the required 10% net biodiversity gain can be achieved for this site. The Council's own ecological assessment appears to favor biodiversity schemes rather than development. Furthermore, no comprehensive protected species surveys were conducted prior to allocation, and the proposed buffers for adjacent ancient woodland, grassland, and wildlife areas are wholly insufficient.

Third, the loss of high-quality agricultural land is unacceptable. These fields have been farmed productively for centuries and are considered among the best and most versatile farmland in the region. Developing this land would undermine food security, particularly when alternative sites with poorer soil quality are available and more appropriate for development.

Fourth, the proposed compensatory measures for Green Belt loss are inadequate and ineffective. Suggestions such as improvements in distant areas do not meaningfully offset the permanent loss of this site's environmental and community value. The Green Belt designation exists to prevent exactly this type of encroachment.

Fifth, the housing figures underpinning this proposal are unreliable. The Council appears to rely on unrealistic assumptions about site capacity and delivery rates. Constraints such as mining legacy, flood risk, and existing landscape features significantly reduce the developable area, yet these have not been properly accounted for.

In addition to these substantive planning concerns, I wish to raise serious objections regarding the fairness and transparency of housing allocation within the S13 area. There appears to be a disproportionate concentration of proposed development in this locality, placing an undue burden on one community while other areas are less affected. This imbalance raises questions about equity and strategic planning.

Moreover, the manner in which this proposal has been advanced gives the impression of underhanded decision-making. The lack of robust supporting evidence, combined with the reliance on future assessments and unclear mitigation strategies, suggests that conclusions have been reached before proper scrutiny has

taken place. This undermines public trust in the planning process and calls into question the integrity of the allocation.

For all of the reasons outlined above, I strongly urge the Council to remove this site from the Local Plan and retain it as protected Green Belt land.

Yours faithfully,
Katie Jenkins

[redacted]

Sent from my iPhone

REF5.0240

Outlook

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

From [redacted]
Date Sun 2026-05-03 2:50 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Sheffield Plan Consultation,

My overall conclusion about the Sheffield Plan is that it is:

too bureacratic

too dogmatic

too doctrinaire

too inflexible in a changing world

too much of a middle class view of the world giving an impression that ordinary people need to be kept in their place

too interested in minority political opinion

insufficiently based on facts

counter-productive

Regards D Smith, [redacted]

> ------ Original Message ------
> From: sheffieldplan@sheffield.gov.uk
> To: sheffieldplan@sheffield.gov.uk
> Sent: Monday, March 23rd 2026, 14:51
> Subject: Sheffield Plan – Main Modifications Consultation – notice of extension to consultation period
>
> Dear Consultee
>
> **Sheffield Plan – Main Modifications Consultation – notice of extension to consultation period**

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We are also consulting on:

- The Integrated Impact Assessment (Update and Addendum) (2026) and Non-Technical Summary.
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- 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

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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.

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

Yours faithfully

[redacted]

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.

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this Email. Be aware that this email communication may be intercepted for regulatory, quality control, or crime detection purposes unless otherwise prohibited.

Outlook

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

From [redacted]
Date Sun 2026-05-03 3:22 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Sheffield Plan Consultation: Housing Requirement

Further to my general comments below can I make a specific point about the Sheffield Housing Requirement figure, 38000.

It is increasingly clear that the government objective of building 1.5m homes to 2029 will not be met. The same issues of supply, demand and cost mean that the equivalent figure in Sheffield will be difficult to achieve. Government also seems clear that it wishes to control international migration.

This has been reflected in the recently published ONS 2024 based population projection which has reduced the net international migration assumption for future years by around one third from 340,000/year to 230,000/year. We know from previous ONS household projection work that around a half of the increase in households is due to international migration. It therefore follows that that latest population projection implies a reduction in the houshold projection by around one sixth. Applied to Sheffield this suggests that the 38,000 Housing Requirement should reduce to around 32,000. I believe that this is a sound, plausible figure that the Council should argue for and would allow the Green Belt to be protected until 2039.

Regards D Smith

> Sheffield Plan Consultation,
>
> My overall conclusion about the Sheffield Plan is that it is:
>
> too bureacratic
>
> too dogmatic
>
> too doctrinaire
>
> too inflexible in a changing world
>
> too much of a middle class view of the world giving an impression that ordinary people need to be kept in their place
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> too interested in minority political opinion
>
> insufficiently based on facts

counter-productive

Regards D Smith, [redacted]

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To: sheffieldplan@sheffield.gov.uk
Sent: Monday, March 23rd 2026, 14:51
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Yours faithfully

[redacted]

Strategic Planning Service Manager

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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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REF5.0241

Outlook

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

From [redacted]
Date Sun 2026-05-03 2:58 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[redacted]

Dear Strategic Planning Team,

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

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

I therefore set out below my objections to specific modifications.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

of the number of homes expected from those sites.

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

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Emily Dunn

REF5.0242

Outlook

Submitting Comments on site SES03 - Eckington Way in the Schedule of Proposed Main Modifications to the Sheffield plan

From [redacted]
Date Sun 2026-05-03 3:37 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[redacted]

Stephen Brough

[redacted]

Reference: Site SES03 - Eckington Way in the Schedule of Proposed Main Modification to the Sheffield Plan

I consider the Sheffield Plan to be UN-SOUND

Introduction

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

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

and Travelling Showpeople — my concern is that this particular site is fundamentally unsuitable for any form of intensive development, and that the evidence base underpinning the allocation is riddled with gaps, contradictions, unanswered questions and broken promises.

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

GROUNDS OF OBJECTION

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

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

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

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

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

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

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

The broken Transport Strategy promise. The council's officers told the Strategy & Resources Committee on 2 August 2023 that over-capacity junctions near SES03 would be reviewed as part of an "updated Transport Strategy for the city, which is expected to be produced by mid-2024." No such site-specific

review has been delivered for Eckington Way. The Transport Vision published in March 2024 is a high-level city-wide aspirational document containing no junction-level mitigation for the Eckington Way area. This was a promise made to elected members and residents to justify proceeding with the allocation. It has not been honoured.

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

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

A central plank of the justification for development at this location was the potential for new employment to support the business case for reopening the Barrow Hill Line to passengers, with a new railway station at Beighton. The Plan itself references this aspiration. However, the Infrastructure Delivery Plan Part 2 Addendum (Arup, May 2025) confirms that the Restoring Your Railways programme — which was to fund the Barrow Hill Line reopening — was cancelled by the government in July 2024. While the Council and SYMCA state they continue to explore alternative funding, the Addendum acknowledges that the public transport policy position is "ever evolving" and no replacement funding source has been identified.

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

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

3. THE PLAN IS NOT JUSTIFIED: Air quality evidence demonstrates the area already exceeds legal limits — and the council has reduced its monitoring

The council's own officers stated at the Strategy & Resources Committee of 2 August 2023 that the proposed site "already is or is close to exceeding air quality levels." The evidence base confirms this is not merely "close" — it was already in breach.

The council's 2018 Air Quality Annual Status Report (ASR) — which forms part of the statutory Local Air Quality Management evidence base — records the following bias-adjusted annual mean NO2 concentrations from diffusion tube monitoring sites in the immediate vicinity of SES03:

Moss Way/Donetsk Way: 47 µg/m³ — exceeding the UK legal annual mean limit of 40 µg/m³

Moss Way/Birley Spa Lane: 36 µg/m³ — approaching the limit

Gypsy Queen/Sainsburys: 30 µg/m³

Moss Grove: 27 µg/m³

The Moss Way/Donetsk Way site is located in the Drakehouse industrial/retail area immediately adjacent to the proposed SES03 allocation. Its 2017 reading of 47 µg/m³ represents a clear and documented breach of the legal limit — and this was recorded before the subsequent wave of commercial development along Eckington Way that has significantly intensified traffic volumes since 2017.

Despite this documented exceedance, when I checked the council's current interactive map of active diffusion tube monitoring sites, neither the Moss Way/Donetsk Way site nor the Gypsy Queen/Sainsburys site appears on the active network. Both have been discontinued at some point between the 2018 report and the present day. A Freedom of Information request has been submitted to the council (26 March 2026) seeking the date and reason for discontinuation, and the complete historical data from these sites.

The implications are stark: the council is proposing to allocate a 6.85-hectare industrial site in an area where its own monitoring demonstrated an existing legal exceedance of NO2 limits, and has since reduced rather than strengthened its air quality evidence base for that area. The most recent air quality survey data for the Eckington Way locality appears to be from 2017 — nearly a decade old. No current baseline data exists from which to assess the air quality impact of the proposed development.

The allocation conditions defer air quality assessment to the planning application stage. But how can this assessment be meaningful when baseline monitoring from the nearest sites has been discontinued, and the last recorded data showed a legal exceedance that has almost certainly worsened given the intervening commercial development?

Furthermore, the Clean Air Zone introduced in Sheffield in February 2023 covers only the city centre inner ring road area. It does not extend to the Eckington Way/Crystal Peaks area. Vehicles travelling to and from the proposed SES03 site face no clean air restrictions whatsoever. The council cannot rely on the CAZ as mitigation for air quality impacts at this location.

4. THE PLAN IS NOT JUSTIFIED: Ecological harm, including confirmed presence of Red List species

The council's own suitability assessment scored the site N (negative) for ecology, concluding it is "likely to have a significant ecological value" and "requires further ecology assessment." The Integrated Impact Assessment identified boundary trees and hedges likely to be of ecological importance, and noted the site's proximity to Local Wildlife Sites and the Shire Brook Valley Nature Reserve. Multiple previous representations have identified the site as functioning as a wildlife corridor connecting Crystal Peak Meadows to Linley Bank to Beighton Orchard Local Wildlife Site.

I can provide first-hand evidence that significantly strengthens this ecological concern. I have personally observed skylarks (Alauda arvensis) nesting and foraging on the Eckington Way field. The skylark is:

Classified as a Red List species under Birds of Conservation Concern 5 (2021)

Protected under the Wildlife and Countryside Act 1981

Designated as a Priority Species in the UK Biodiversity Action Plan

A species that has suffered a catastrophic 62% decline in UK breeding population between 1970 and 2015

Skylarks are ground-nesting birds that require open grassland with short or tussocky vegetation — precisely the habitat provided by the Eckington Way field. Industrial development with its associated hard surfacing, buildings, noise, lighting, vehicle movements, and human activity is entirely incompatible with the continued presence of this species. The destruction of suitable habitat for a ground-nesting species already in severe national decline is not something that can be "mitigated" or "compensated" at the planning application stage — once the habitat is gone, it is gone.

The NPPF (paragraph 180) requires the planning system to minimise impacts on and provide net gains for biodiversity. Paragraph 186 states that if significant harm cannot be avoided, adequately mitigated, or compensated for, planning permission should be refused. Allocating a site known to support Red List species, without any prior ecological assessment, is inconsistent with this framework.

Yet the allocation has been confirmed with the further ecology assessment deferred to the planning application stage. If that assessment reveals — as the council's own scoring and the confirmed presence of protected species strongly suggest — that significant parts of the site are ecologically constrained, the effective developable area may be substantially reduced, undermining the viability of the allocation entirely.

5. THE PLAN IS NOT JUSTIFIED: Loss of confirmed Grade 2 agricultural land and the Green Belt question

The council's officers' report to the Strategy & Resources Committee (August 2023) confirmed that a strip of land along the western edge of SES03 is classified as Grade 2 — best and most versatile agricultural land. This is a higher classification than acknowledged in the Plan's site allocation conditions, which only require surveys to determine whether the land is Grade 3a. This is a direct inconsistency in the council's own evidence base: the officers know the site contains Grade 2 land, but the allocation conditions don't reflect this.

The NPPF and DEFRA's 25 Year Environment Plan both direct planning authorities to protect the best and most versatile agricultural land and to use areas of poorer quality land in preference. The Plan's own Policy GS4 seeks to safeguard such land. Allocating a site where Grade 2 land has been confirmed, without the allocation conditions properly acknowledging or protecting this, is inconsistent with national policy and the council's own Plan.

The land has been in regular agricultural use for crops including wheat, oilseed rape, and runner beans — the presence of oilseed rape being relevant as a defining crop for Grade 3a classification, which would elevate the wider site into the "best and most versatile" category.

Furthermore, the site's Green Belt function remains contested. The council's own Green Belt Review (Appendix 19) states that the SES03 land is "included within SE-4-b" — the adjacent Green Belt parcel. The site scores identically to SE-4-b in the Green Belt assessment matrix (2/1/5/5), including maximum scores of 5 for Purpose 3 (safeguarding countryside from encroachment — with over 80% covered by beneficial countryside uses) and Purpose 5 (assisting urban regeneration by encouraging recycling of derelict land). Even if the council maintains the site is not technically designated Green Belt, it functions as Green Belt in every meaningful respect, and its development would undermine the purposes that the adjacent Green Belt designation is intended to serve.

6. THE PLAN IS NOT EFFECTIVE: Physical constraints make the allocation undeliverable as proposed

The cumulative effect of physical constraints on SES03 means the site cannot deliver anything close to the 5.35 hectares of net employment floorspace the allocation assumes. These constraints include:

High-voltage electricity pylons and cables running diagonally across the site. The council's own officers acknowledged that development under the power lines may be limited to access roads and car parking, and are awaiting confirmation from National Grid on whether any buildings would be permitted. This significantly reduces the developable area.

A high-pressure gas pipeline running through the site, requiring permanent access corridors which further restricts building and excavation work within SES03.

The required environmental buffer strip between the existing housing and the developed part of the site.

Ecological corridors and buffers required to maintain habitat connectivity and protect adjacent Local Wildlife Sites, which the allocation conditions specify must be maintained and removed from the developable area.

The Grade 2 agricultural land strip along the western edge.

When all these constraints are properly accounted for, the effective developable area shrinks dramatically. The council acknowledged at the examination hearing that "the capital costs are not fully known." This is not a sound basis for a plan allocation.

Additionally, the Becton Centre for Children and Young People — providing CAMHS, child and adolescent psychiatry, inpatient eating disorder facilities, and self-harm services — is located adjacent to the southern edge of the site, separated only by a footpath. Industrial development immediately adjacent to a mental health facility serving the city's most vulnerable young people raises serious amenity and incompatible use concerns that have never been properly assessed.

7. THE PLAN IS NOT CONSISTENT WITH NATIONAL POLICY: The assessment of alternatives is inadequate

The council's site selection process for the travelling showpeople element of SES03 considered only two sites in the entire city — Eckington Way and Hesley Wood — with Hesley Wood ruled out because it lay within the Green Belt. The Integrated Impact Assessment confirms no other reasonable alternatives were assessed.

In a city of 368 square kilometres, a search that identifies only two potential locations and eliminates one on a single criterion does not constitute the robust assessment of alternatives required by the NPPF and the SEA Regulations.

Since the original assessment, circumstances have materially changed. Hesley Wood (now designated CH04) has been brought forward as an additional Green Belt employment allocation in the Inspectors' January 2026 post-hearings letter. It is now formally proposed for release from the Green Belt for employment use. If Hesley Wood is being allocated for employment anyway — the very use category that applies to the majority of SES03 — could it not also accommodate the Travelling Showpeople use that is currently being forced onto the manifestly constrained Eckington Way site? This needs to be reassessed as it is now a more suitable site than SES03

Furthermore, Clive Betts MP informed the residents' panel in March 2025 that a willing landowner in the north of the city has come forward offering to host a site of the type proposed at Eckington Way. This has been noted by the Inspectorate. Yet neither Hesley Wood nor this alternative has been assessed as an option for the travelling showpeople provision.

The travelling showpeople element requires only approximately 1.5 hectares. Coupling this modest requirement with a 5.35-hectare industrial allocation has the effect of tying the travelling showpeople provision to a site whose transport, air quality, and ecological constraints make it unsuitable for any intensive development. The council should be required to demonstrate that a genuinely comprehensive, city-wide site search has been undertaken.

The cross-boundary dimension has also been inadequately explored. Councillor Crossland's February 2023 objection noted that the Sheffield Gypsy and Traveller Accommodation Assessment acknowledged Doncaster has an oversupply of travelling showpeople provision, and that the required Statements of Common Ground between South Yorkshire authorities on GRT provision had not been produced before SES03 was proposed. This duty to cooperate concern has not been resolved.

8. THE PLAN IS NOT JUSTIFIED: The council's own committee decisions contradict this allocation

On Thursday 3 November 2022, the council's Transport, Regeneration and Climate Policy Committee resolved that:

"Releasing greenfield land in the Green Belt for development now has a high risk of undermining efforts to reuse the substantial supply of brownfield sites in the City Centre and other parts of the urban area. It would also cause significant harm to the city's biodiversity and would undermine the city's reputation as the 'Outdoor City'. The adverse impacts of meeting the full need therefore significantly and demonstrably outweigh the benefits of meeting the need for housing and other development when all factors are considered."

The council adopted SES03 — a greenfield site that its own Green Belt Review identifies as functionally equivalent to adjacent Green Belt land — just weeks after this committee resolution. The contradiction has never been explained.

9. CONSULTATION HAS BEEN INADEQUATE THROUGHOUT

The SES03 allocation attracted more public comments than any other element of the Plan, with over 4,000 people expressing opposition across multiple petitions. Despite this unprecedented level of objection, only minor cosmetic changes were made to the site conditions — the addition of an environmental noise buffer, overhead power line considerations, and removal of an agricultural land condition. Not one of the substantive concerns regarding traffic capacity, air quality, ecology, or suitability was addressed.

A member of the Springwell Residents' Panel, Fiona Duncan, spoke on behalf of residents at the Strategy & Resources Committee on 2 August 2023. Clive Betts MP subsequently praised her contribution, saying she "did a great job at the committee, both focusing in on the issues but also in a very clear way." Yet as another panel member, Steve English, documented at the time: "her points were not addressed by either Tom Hunt nor any of the planning officers. It was a total whitewash."

Clive Betts MP told the October 2024 examination hearing that the council's consultation on Eckington Way was not meaningful — that the council believed the draft Plan could not be altered regardless of consultation responses because that would constitute a significant change requiring the process to start

again. If the council had already decided the Plan could not be changed, the consultation was an empty, lip service only exercise.

10. THE INSPECTORS HAVE NOT YET PUBLISHED REASONING ON SES03

It is important to note that the Inspectors' Stage 3 & 4 post-hearings letter of 16 January 2026 (EXAM 213) does not specifically address SES03. The letter deals with additional Green Belt allocations, housing and employment supply figures, and other specific site matters — but contains no analysis of or conclusions about the Eckington Way allocation. The Inspectors state that "full reasoning and conclusions will be set out in the Inspectors final report."

Reports in the media and from some politicians that the Inspectors have "agreed" or "approved" the Eckington Way allocation are premature. The Inspectors have not rejected it, but they have equally not published any reasoned conclusions about it. The October 2025 update from Clive Betts MP noted that the council had not fully updated the Integrated Assessment Report in relation to SES03, relying on arguments that no longer apply given the acceptance of Green Belt release elsewhere. The MP made a further submission to the Inspectorate highlighting this deficiency, and the Inspectorate flagged it at hearings — which the MP interpreted as a positive sign for objectors.

This Main Modifications consultation remains a live opportunity to demonstrate that SES03 is unsound.

11. LACK OF TOPOGRAPHY CONSIDERATIONS

Consideration has not been given to the fact that the SES03 land is one of the highest in the immediate area and has previously been rejected from previous development as unsuitable because of this.

It's high position leaves it fully exposed to winds and I find it strange that the council deems it suitable as a location to settle Travelling Showpeople. I thought we had a requirement to provide suitable land/areas for Travelling Showpeople which SES03 clearly is not.

Also has consideration and subsequent mitigation been given to the fact that this high land is visible to all in the surrounding area and the visible impact on the environment of the equipment that would be stored and repaired on the land. By the very nature of the work of Travelling Showpeople (fairground rides/ attractions), their equipment is brightly coloured to attract customers and this will have an adverse effect on the environment and will be seen for miles.

CONCLUSION AND REQUESTED CHANGES

The evidence assembled in this representation demonstrates that the allocation of site SES03 fails every test of soundness:

Not positively prepared: The allocation does not address the transport infrastructure deficit, air quality concerns, or ecological constraints necessary to support the development it proposes.

Not justified: The council's own evidence shows highway capacity already exceeding 100%, air quality monitoring at adjacent sites exceeding legal NO2 limits, the worst possible public transport accessibility

score, confirmed Red List species on site, Grade 2 agricultural land, and an assessment of alternatives limited to just two sites in a city of 368 km².

Not effective: Physical constraints (HV pylons, gas pipeline, buffer strips, ecological corridors, Grade 2 land) render the allocation undeliverable at the proposed scale, and no infrastructure mitigation is funded or planned.

No topography considerations for the Travelling Showpeople who would live in this site or the environmental impact of a Travelling Showperson's site in such an elevated location.

Not consistent with national policy: The allocation conflicts with NPPF provisions on biodiversity protection, agricultural land, air quality, sustainable transport, and the assessment of reasonable alternatives. It also contradicts the council's own November 2022 committee resolution on greenfield development.

I request the following changes to make the Plan sound:

(a) The removal of site SES03 from Policy SA5 and from the Annex A Site Allocations Schedule.

In the alternative, if the Inspectors are not minded to remove the allocation entirely:

(b) A requirement for the completion and publication of highways capacity mitigation for the Eckington Way/Mosborough Parkway junction, with identified funding, prior to the Plan's adoption;

A requirement for reinstatement of air quality monitoring at the Moss Way/Donetsk Way and Gypsy Queen/Sainsburys diffusion tube sites, and the establishment of a current baseline dataset, prior to adoption;

A requirement for a comprehensive ecological assessment, including breeding bird surveys covering skylarks and other ground-nesting species, to be completed and published prior to adoption;

Correction of the allocation conditions to acknowledge the confirmed presence of Grade 2 agricultural land on the western edge of the site.

A requirement for a comprehensive, city-wide site search for Travelling Showpeople provision that considers a genuinely broad range of alternative locations — including Hesley Wood (CH04), the site offered by the willing landowner in the north of the city, and cross-boundary options — not limited to just two sites.

Given all the points raised I am unable to understand why the council has railroaded through the allocation of SES03 land for the use of industrial employment element and Gypsies, Travellers and Travelling Show-people.

There are better alternatives, as the council has already identified but are ignoring. I hope the Inspectorate can see that Sheffield City Council have unjustly and blindly perused SES03 which is an unsuitable site, with inadequate and misleading consultation and have failed to address / answer key points detailed in this and that SES03 proposal makes the Sheffield Plan UNSOUND.

Yours Faithfully

Stephen Brough

REF5.0243

Outlook

Modification reference - MM411

From [redacted]
Date Sun 2026-05-03 3:59 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

I object to the release of this vital greenbelt area in s13 and request it is removed from the local plan and kept as GREENBELT . This plan is unsound and has many ill thought out flaws.

the latest diagram of this site fails to show the placement of the buffer zones around the waterway, the ancient hedgerows and trees , patches of grassland including protected wildflowers and official footpaths & bridleways.
Having been out myself and calculated where these may be, they are simply inadequate and will offer little to no protection to these vital habits and the extensive root systems. At present we have at least 6 breading pairs of skylarks which are on the RSPB'S red list of endangered birds. Amongst the hedgerows are drifts of protected bluebells.
The fields themselves are arable worked farm land , vital in the production of food, how do we feed a growing population if farm land is released for development.
Also nowhere does it show where or how large the holding tanks/ponds will be that will collect the run off water. As it is , flooding at sherbert bridge on Beaverhill Road is a regular occurrence, as is flooding all the way along flockton park and the gardens on the Badger estate. Are these tanks / ponds even still going to be a part of the plan ? Without them the flooding will be catastrophic, not just here but down stream in Catcliffe.

The 3 proposed entrances to this site are very questionable. 2 are directly off Beaver Hill Road in what can only be describe as potential accident black spots. Any entrance from beaver hill Road will have to go over the water way which is ment to have a buffer zone around it , so how does that work ? Also any access road to the development will travel through the ancient hedgerows which should also have buffer zones around them. Again how does that work ? The 3rd entrance is via a busy used bridleway which in turn is accessed via a side road of an existing housing estate, that has on street parking due to not all the houses having drives. This very reason itself was why an alternative proposed development site was rejected from the plan.
The local road network can not cope with anymore traffic, at times it is slow moving or at a standstill. Particularly at school drop off & pick up times, am & pm rush hours and when division's are in place, which in turn generates additional pollution. None of which is been monitored. The areas roads are part of out laying villages commuter routes too and from Sheffield city centre, I don't see how improvements to public transport would alleviate the congestion as many of the out laying villages are not in South Yorkshire.
Nowhere in the plan is there any plans to improve the road infrastructure, to be frank I don't see how they can. The recent installation of traffic lights at the junction of Rotherham Road and Retford Road are causing major congestions problems with traffic building up in all directions all times of day. Frustrated drivers are looking for alternative routes , often speeding round side roads and estates. In addition to all of the above no considerable has been given to the fact that this part of s13 is overrun with leaner drivers , using the major roads and side streets , with lessons starting as early as 6am and carrying on till gone 10pm 7 days a week. Plus all the tests that take part , given the test centre is just off Retford Road on the Orgreave industrial estate.

The proposal on this site of a multi faith burial ground that may or may not be required ? Why on this site ? It makes no sense. There is already a burial ground in the area , which already has an entrance and caretaker. If the land that boarders this existing burial ground is available for development why can that one not be extended ? It makes more sense than creating another one that's entrance is very possibly via the narrow streets of an existing housing estate and would sit opposite an infant & junior school. If it was to be in the field

that we all believe it will be , then the heads up is , large sections are frequently flooded and boggy. Also where will visitors park ? On the existing housing estate in front of peoples houses and driveways ? I can not think of a more inappropriate entrance and route for a funeral cortège to travel along and get stuck in multiple areas.
The proposal on the site of an additional secondary school that may or may not be required and yet so close to an existing one.. what comes to mind is the rivalry between the 2 schools generating anti social behaviour not to mention the chaos the traffic congestion will cause and it too may over look the multi faith burial ground, very inappropriate for both grieving families and school children alike.
If the land is released from its greenbelt status but then the school & burial ground don't happen, what then ? Will it then be released for housing ? Or return to greenbelt. I can't find any information regarding this possibility. The may or may not be required element of this proposal seems like a sneaky way of building more houses.

The planned number of houses and build rate is unrealistic. Scc have failed to take into account the topography of the land, realistic buffer zones needed around waterways, hedgerows and trees. The sites of previous mining activity, plus the flood risk.

Scc are making no provisions for improvements to all or any infrastructures in the area. The drs are over capacity and existing patients fail to get access to reasonable health care. The schools and local nursery's are full, with long waiting lists. Local dentists are full, again with waiting lists. The present bus service is questionable, we have no local bank.
The neighbouring development at Waverley has had a massive impact on local services but SCC will not acknowledge this and simply brush it off , stating that's Rotherham. There is no wall or barrier preventing the residence of Waverley using the existing local services, more so because the developers failed to deliver the proposed infrastructure on that development.
The only element SCC will lament about in regards to the Waverley development is the proposed rail station, using it as leverage stating that the tram train will improve public transport and offer greener travel.
The building of the rail station will only provided another station to stop at on an already busy and often full to capacity train route. There will be no additional trains added to the service nor will extra carriages be added either. Sheffield rail station does not have the capacity to accept any more trains.
Whilst it's very likely the building of the rail station will go ahead, no figures or plans have been released, just for reference the latest tram/ train station at Magna Rotherham cost in the region of 10 million pound. The proposed tram/ train service that may or may not open on the old woodhead route, is just still been talked about. There is no definitive confirmation as to when or if it will happen. Therefore it is grossly unfair that SCC should use it as a plus for development in the area , so therefore it should be discounted.

Amanda Finbow Froggatt
[redacted]

Sent from my iPad

REF5.0244

Outlook

Main modification objection mm411 regarding site proposal ses30

From [redacted]
Date Sun 2026-05-03 4:05 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Sir

Please find below my Objection in regard to the Main Modification (your Refs MM411) regarding the proposed development on sites SES30 and SES 29 included in the Sheffield Plan.

First of first it was evidently clear at the hearings that severalissues were raised by the appointed Government planner where SCC had not shown clear understanding, planning and due diligence with regards to adding these sites into the plan.

Traffic and its Impact

The first obvious instance was in relation to the Transport Network and the lack of investigation and mitigation both sites would need as evidence that was not provided to showthat the local road network in the vicinity of these proposed Greenbelt allocations can accommodate additional trips safely and efficiently and that a clear policy which should include a sustainable transport package has been looked into nor that existing congestion on a constrained network with its regular queuing and unreliable journeys on the B6066/B6200 corridors, with limited scope for capacity improvements was understood and accounted for. SES30 has newly increased issues at Retford Road/Beaver Hill Road sits very close to the new Lidl signals, increasing leaving the area with significant residual queues, its already evidently clear that this new set of traffic lights not only has increased congestion but also caused significant decrease in air quality and delayed many emergency response times for such vehicles stuck in the traffic which at times can go back as far away as the exist from Sheffield Parkway on the B6200.

With further development in the area already stressed junctions and corridors could be made materially worse. Road safety and severance records already show injury collisions (2020–2024) included serious/fatal outcomes so more traffic and crossings will increase exposure and risk of conflict. Together sites SES29 and SES30 could add around 1700 homes, employment land, a secondary school and a burial ground onto the same

constrained roads in S13. I know there are serious concerns regarding the Sheffield plan itself meeting Regulation 19' of The Town and Country Planning (Local Planning) (England) Regulations 2012 as that policy should focus on four main tests of soundness, namely Positively Prepared: Based on a strategy that seeks to meet objectively assessed development and infrastructure requirements; Justified: Based on proportionate evidence; Effective: Deliverable over the plan period; Consistent with National Policy (such as the National Planning Policy Framework (NPPF).

Although the Inspectors seem now consider the Plan to be sound and legally compliant subject to main modifications being agreed and made, surely the Inspectors will seek to determine whether adding a site or sites, such as SES29 and SES30, makes the plan viable on both housing and employment needs considering the unmitigable traffic issuesand that a detailed transport assessment, sustainability appraisal, habitats assessment, and public consultation should be put in place as its abundantly clear that the four main tests of soundness have not been met because the proposed Main Modifications fail to resolve the infrastructure and highway safety issues identified during the examination .

This was clearly shown by the embarrassment of the Traffic dept from SCC who were unable to answer detailed questions by the planner but only could respond with "it will be investigated and discussed in more detail and the planning application stage" and that the proposals still lack detail on matters such as access design, precise number of houses and that the four main tests of soundness have not been satisfied because the proposed Main Modifications fail to resolve the infrastructure and highway safety issues identified during the examinations.

Very little was taken into account at these hearings even though I did raise the issue of the addition the expanding Advance Manufacturing Park (AMP) at Highfield Spring, the Waverley housing development and my colleagues did question the proposed and ongoing developments in and around Handsworth, for example the new Lidl store immediately between the two sites, and the nearby SES28 allocation on Beighton Road.

Even to us as residents with little planning knowledge and experience that it does not seem that the overall traffic impacts of these and other developments have been sufficiently considered in the individual site assessments for the Sheffield Plan, so surely to those who do understand such implications there are "red flags" that must be addressed because the sites are greenbelt sites and must meet the Inspectors requirement for proposals to meet the 'Golden Rules' of the National Planning Policy Framework (NPPF).

The Golden Rules state that for greenbelt release, sites must deliver 50% affordable housing, the upfront provision of necessary local infrastructure and the creation of enhanced, publicly accessible green spaces. This means that the developer must prove that they can mitigate the impact on local roads and provide the required improvement measures, preferably pre-commencement rather than pre-occupation to avoid construction

traffic adding to the existing traffic problems. SCC traffic dept do not seem to understand this and little or no action was undertaken before adding these sites into the Sheffield Plan, both SES29 and SES30 are characterised by fairly sensitive landscapes where development would reduce openness and alter landscape function, with complete mitigation difficult to achieve and some of the mitigation mentioned at the hearings was frankly absurd and humiliating for the council to put forward a suggested traffic "loop" to assist access to the site via Beaver Hill Road.

Indeed, with regards to site SES30, Sheffield Online, in December 2025, ran an article on residents' concerns about severe traffic congestion and unsafe parking caused by school drop-off and pick-up times for Handsworth Grange Academy and Ballifield Primary School. I have personally seen the chaos in that area, and I personally know many residents feel they are prisoners within their own home specifically atschool times, with cars parking on zig-zags, pavements, grass verges and even private driveways. This blocks access for residents including disabled people,
damages verges,significantly increases air pollution due to standing traffic and often leads to arguments and unsafe situations.

I have seen evidence that despite repeated reports to the police, the schools, and Sheffield City Council, locals feel that no effective action has been taken. They are calling for stronger enforcement and better management to improve safety for children, parents, and residents. This seems to strongly contradict SCC's position on local roads being within capacity and not requiring mitigation and their behaviour not addressing such concerns at the hearing appeared to many as bordering on institutional neglect of duty. It appears that SCC traffic dept visited the area over the summer holidays and therefore did not obtain a true representation of the high level of traffic and congestion within the area of SES30.

Environmental Issues and NFPP policy requirements

As part of the Sheffield plan the NPPF requires councils to meet housing need while protecting the environment but it's clear that SCC has overallocated greenfield land instead of focusing on maximising brownfield regeneration. The argument seems to be that the insistence of regeneration on brownfield with the exclusion of greenfield is based is effected by cost but surely the point being missed here is that of "regeneration" using derelict and unsightly land will and should create new viable useable areas and therefore maximising land that is not in current use, will knowingly improve the whole of Sheffield.

SES29 and SES30 are both viable farmland with good agricultural benefits to us again as non-planners it appeared as both lazy and short-sighted to automatically add these sites into the plan at the stage when the Inspectors asked Sheffield to increase housing numbers.

But this does not and should not automatically justify using greenfield land in S13, it just showed that SCC were not prepared for such requests and that no evidence that this the allocation is the best option for development and that SCC has not provided robust evidence that S13 greenfield land is the most sustainable or least harmful option. At these times of raised awareness regarding the UK's own food security it seems ridiculous that good quality farmland being added to a housing plan is wrong.

My initial objection and many others during the consultation have expressed to SCC that both sites are vital balancing air quality within S13, so again to reiterate a previous objection taking away areas of carbon absorbing fields to create housing and industrial areas that are carbon omitting is wrong and needs to be legally challenged, after all it's a basic human right to clean air.

Indeed, the Sustainability Appraisal does not demonstrate that alternatives were properly compared and as stated in previous objections and with regards to SES30 the site has biodiversity, flood risk, heritage value, and recreational use and the Council has not shown show why it is still preferable for housing use and therefore the allocation is unsound.

Inclusion of both sites is not consistent with NFPP policy which includes strong protections for Green Belt, Biodiversity net gain, Local green spaces, Flood risk areas, Valued landscapes and its use as Recreational land, if anything the allocation of SES30 conflicts with NPPF paragraphs 174–182, which require councils to protect natural capital, biodiversity, and greenfield land.

The site is used by the community, and qualifies as a valued landscape, which the NPPF says must be protected as listed below

There are SiteSpecific Characteristics, including heritage trails and its use as a historic and significant Quaker Burial ground.

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.

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. SES30 land is widelyused for recreation, dog walking, informal play, and community use by local groups such as the Scouts and our local running club - indeed the Government planner at the hearings opened her statement with the comment that she had walked the SES30 site the day before and was exceptionally surprised by its recreational use , to the point she commented she couldn't get away from people enjoying its

benefits, The Council has not significantly or adequately provided replacement open space within a reasonable area making the allocation contrary to national policy.

Flood Risk again referring to NPPF + Flood and Water Management Act 2010) as evidence has been previously submitted SES30 The land already has flood and surface water issues, indeed the flooding of Beaver Hill road has been evidenced previously and although acknowledged by SCC no mitigation of this has been accounted for but SCC must apply the Sequential Test and Exception Test otherwise this inclusion in the allocation is unsound and unlawful.

Legal Issues and Requirements

Failure to Comply with the Duty to Cooperate (Planning & Compulsory Purchase Act 200), it was evidently clear and raised by the Inspector at the hearing that due diligence was lacking in regards to SCC and its failure to correspond with the current tenants on SES30, In particular the owner of Myrtle Bank Farm who knew nothing about the proposed development of his land until the following day of the hearing when a mis directed hand delivered letter was handed to him by a neighbour – again this shows SCC incompetence and complete lack of preparation.

The Council has not shown evidence of sufficient cooperation with neighbouring authorities (Rotherham, Derbyshire) regarding housing numbers or land supply again this was discussed and acknowledged at the hearing that SCC has not actively engaged with other local authorities to discuss alternative options.

The allocation of greenfield land in S13 is unlawful because crossboundary alternatives were not explored fully. It was acknowledged at the hearings that the Waverley development and its significant housing development with regards to environment, flooding , impact on traffic and local services had not been accounted for but was only commented with – but that's Rotherham and their issues , but legally such a huge housing estate must be considered therefore, The Duty to Cooperate is a legal test and therefore the Plan cannot be adopted.

Unfairness, delivery and summary

It is evident to see that adequate consultation with residentsunder the Town and Country Planning Regulations 2012 was not met, Residents were not properly notified, and key documents were updated late in the process. I have personally spent much of 2025/2026 acting on this matter as part of the Saves13 Greenbelt campaign and informing as many residents as possible of the building proposals in S13, many consider the consultation is

procedurally unfair because updated documents were released after the consultation began.

SCC seem to actively keep us in the dark, withholding frequent Freedom of Information requests and acting in their own interests and not for the community they serve. This may breach Regulation 18 and 19 consultation requirements. To all concerned these breaches the Soundness of the plan under NPFF which requires that all arguments are positivelyprepared, justified, effective and consistent with national policy as it appears none of the required tests of soundness have been met.

SCC has acted ignorantly on its own plan as it's apparent that SES30 is not effective ie cannot be delivered as the site has constraints as detailed above, The allocation is not deliverable within the plan period (to 2039). As Infrastructure concerning 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". This was abundantly clear at the hearings and it's frustrating to all residents that the release of the Main Modification does not reflect evidence supplied to the consultations therefore the procedural argument is flawed, and the law states Main Modifications cannot introduce new allocations unless necessary for soundness.

Finally, I conclude the allocation of SES30 is unlawful because it goes beyond what Main Modifications are allowed to do, therefore it should instead trigger a new Regulation 18/19 consultation.

Yours faithfully

Debra Dent

Resident of S13

REF5.0245

Outlook

FW: Objection to the proposed Main Modifications to the Sheffield local plan - SS19

From [redacted]
Date Sun 2026-05-03 4:11 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

6 attachments (2 MB)
Screenshot_20260503_155944_Facebook.jpg; Screenshot_20260503_155951_Facebook.jpg;
Screenshot_20260503_155957_Facebook.jpg; Screenshot_20260503_160003_Facebook.jpg;
Screenshot_20260503_160009_Facebook.jpg; Screenshot_20260503_160015_Facebook.jpg;

External email

[redacted]

Morning

Please note my objection to the above attachment.

Name : Mrs C Walton

[redacted]

Kind regards
C Walton

Sent from my Galaxy

-------- Original message --------
From: [redacted]
Date: 03/05/2026 16:06 (GMT+00:00)
To: sheffieldplan@sheffield.gov.uk
Subject: Objection to the proposed Main Modifications to the Sheffield local plan - SS19

Sent from my Galaxy

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]

REF5.0246

Outlook

Objection to the proposed Main Modifications to the Sheffield local plan - SS19

From [redacted]
Date Sun 2026-05-03 4:31 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

6 attachments (1 MB)
1000040254.jpg; 1000040267.jpg; 1000040264.jpg; 1000040253.jpg; 1000040252.jpg; 1000040255.jpg;

External email

[redacted]

To who it concerns.

See above attachments.

Please note my objections

Mr M.Walton

[redacted]

Sent from Outlook for Android

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.

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.

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

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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built-up area, **erode the separation between Sheffield and North East Derbyshire**, and **constitute significant countryside encroachment**. The two developments would effectively double the size of the Charnock estate with no planned proportionate infrastructure to support this rapid growth.

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

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

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

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

Yours sincerely,

[Your Name]

REF5.0247

Outlook

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

From [redacted]
Date Sun 2026-05-03 4:42 PM
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 Chapeltown, Ecclesfield and Grenoside Green Belt campaign group has conducted a review of brownfield sites across Sheffield and identified a substantial number of viable alternatives for housing and warehouse development (see Exam 141). This evidence demonstrates that sufficient capacity exists within brownfield land to meet the requirements of the Sheffield Local Plan, without the need to develop Green Belt sites.

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

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

Yours faithfully,

Catherine Barrass
[redacted]
03/05/2026

REF5.0248

Outlook

Objection ses30 modification mm411

From [redacted]
Date Sun 2026-05-03 4:54 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[redacted]

Dear sir or madam

I consider it unsound to release SES30 MODIFICATION MM411 Unsound to be realised from green belt

These fields have been fed for centuries,these fields according to defra are predicated to be among the most fertile and vible in the county and developing them would hurt food security

Most importantly these new 827 houses will have a huge and detrimental affect on the quality of life of the residents that already live in s13 , the extra traffic caused by this development will seriously harm air quality, the serious road safety issues that already present in s13 will be worked further

The loss off important wildlife and reduced quality of life for existing residents is unacceptable

Yours

Jarrod Radford

REF5.0249

Outlook

Representation on Main Modifications

From [redacted]
Date Sun 2026-05-03 6:12 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 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.

Secondly, 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.

Finally, 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.

Bethany Cheshire
[redacted]

REF5.0250

Outlook

MM332 – Main Modifications for proposed Site Allocation NWS31 – Conditions on Development.

From [redacted]
Date Sun 2026-05-03 7:08 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

To Whomever it may concern,

I am writing in response to the conditions on development for proposed building on greenbelt land.

The following points relate to MM332 – Main Modifications for proposed Site Allocation NWS31 – Conditions on Development.

Access to site
The access to the site was only confirmed at the hearings stage and therefore we have been given insufficient opportunity to make representations regarding this.
There are a number of issues with general access:
- As a resident directly adjacent to the proposed site I understand that we will not have direct vehicle access to our home whilst building takes place. I'm appalled that this is considered acceptable and I'd like to understand the provisions for emergency vehicle access and parking on my own property as well as safety provisions for my child.
- Currently the council are undertaking underpinning work to the homes on Dixon Drive - route to Don Avenue access site. This has been ongoing for several weeks now and most mornings currently I am driving on pavements to be able to pass the numerous council vehicles blocking the roads. What provisions are being made around this for the build of 103 homes?
- The proposal to build over 100 homes usually requires two access points. As the proposal here is for 103 homes how can the plan be "sound"?
- The local village school serves not just the immediate community, but villages around (Oughtibridge school has been over subscribed for many years) and particularly for SEND children. Therefore, there are more and more vehicles requiring parking for drop off and pick up each day, it can be extremely difficult to access Don Avenue at these times. How do you propose to ensure safety at these times and others?
- Already, it is challenging to exit the bottom of Brightholmlee Lane due to the amount of traffic on the main road from the new builds in nearby Deepcar and Oughtibridge Valley. What provisions will the council make to alleviate this?

Loss of green and open space
The council have acknowledged that the site is well used and valued by the local community. You have also stated that, that: "For Health and Wellbeing, some new site allocation may reduce the overall amenity experienced by nearby residents".
How can the plan be "sound" with this acknowledgment? This is not a piece of unused land. The site provides a safe, play area for the children of the village and

a walking route for many.

Flood Risk

The site continues to have significant challenges with groundwater and drainage which hasn't been properly assessed.

- The site has been waterlogged for much of the past 9 months which is the norm outside of the summer months. With the garden of my home adjacent to the field we have experienced considerable flooding creating instability on the ground.
- The site hasn't been assessed for climate change. Why is this and when will this happen?
- I understand that there were significant challenges when building our homes which are adjacent to the field because of drainage issues during construction resulting in negative profit margins. Are potential developers made aware of this prior to the council selling them the site?

Biodiversity

We have presented numerous pieces of evidence of protected species on the site yet there was no mention of this during the hearing.

- The ecology report states a requirement for a further detailed investigation of protected species. How can a plan be considered "sound" when this hasn't taken place? When will this happen and how will you deal with the results?

It is clear that detailed assessments have not taken place and full information not provided therefore the classification that the plan to build on this site is "sound" is fundamentally flawed and the council is knowingly omitting full information for an informed decision to be made.

I trust that you will review all the important points raised here and by many other village residents and do the right thing for the climate, the community, the wildlife and the wonderful green space used and valued by so many.

Yours Sincerely,

Helen Crowell

Sent from my iPhone