Sheffield Plan Main Modifications

Responses – by email

Reference numbers REF5.0351 to REF5.0400

Reference Number	Respondent Name	Organisation
REF5.0351	Peter Pearson	Individual
REF5.0352	V Palmer	Individual
REF5.0353	Margaret Hall	Individual
REF5.0354	Allison Norris	Councillor
REF5.0355	Nicola Siddall	Individual
REF5.0356	Steven Dale	Individual
REF5.0357	Sharon Driver	Individual
REF5.0358	Emma Smith	Individual
REF5.0359	Kay Dyche	Individual
REF5.0360	Margaret Osborne	Individual
REF5.0361	Emily Hoare	Individual
REF5.0362	Robert Rabjohn	Individual
REF5.0363	Rachael Nixon	Individual
REF5.0364	Not specified	CEG Greenbelt Campaign Group
REF5.0365	Claire Pennington	Individual
REF5.0366	Sophie Jones	Individual
REF5.0367	Chris Burkinshaw	Individual
REF5.0368	Conrad Aldridge	Individual
REF5.0369	J Pemberton	Individual
REF5.0370	C Pemberton	Individual
REF5.0371	Gill Travis	Sheffield Green Belt Alliance
REF5.0372	Julie & Christopher Cooper	Individual
REF5.0373	Robin Hughes	Joined Up Heritage Sheffield
REF5.0374	Sopheana Cartledge	Individual
REF5.0375	Richard Nutbrown	Individual
REF5.0376	Andrew Mellor	Individual
REF5.0377	Lauren Mellor	Individual
REF5.0378	Deborah Newton-Nutbrown	Individual

REF5.0379	Jack Ellis	Individual
REF5.0380	Russell Mellor	Individual
REF5.0381	John Mellor	Individual
REF5.0382	Avarna Ellis	Individual
REF5.0383	Gail Machen	Individual
REF5.0384	Not specified	Save S13 Green Belt: The Sapphire McCarthy Campaign
REF5.0385	Christopher & Elizabeth Birkby	Individual
REF5.0386	A Pink	Individual
REF5.0387	Hyacynth Cabiles	NHS Property Services
REF5.0388	Janice Nicholson	Individual
REF5.0389	Clive Betts	MP
REF5.0390	Faye Costello	Individual
REF5.0391	Elizabeth Miller	Individual
REF5.0392	Gill Travis & Ray Ritchie	Individual
REF5.0393	Diane Ramsden	Individual
REF5.0394	Gary Smelt	Friends of Shirtcliffe Valley
REF5.0395	Luke Goddard	Individual
REF5.0396	Rebecca Manning	Individual
REF5.0397	Peter Sorby	Individual
REF5.0398	Jake Ramsden	Individual
REF5.0399	Angela Brooks	Fisher German
REF5.0400	John & Sally Walton	Individual

REF5.0351

Outlook

Main Modification Comments

From [redacted]
Date Mon 2026-05-04 10:12 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

1 attachment (71 KB)
Peter Pearson - Main Modifications Objection - May 2026.pdf;

External email

Please see attached my objections to site NES36 in the Sheffield Local Plan.

Regards,

Peter Pearson
[redacted]

Sheffield Local Plan – Site NES36 (Smithy Wood) – MM350 Public Consultation.

A modification to the site boundary has removed Stuart Keen's land from the plan. Mr. Keen had been seeking its removal since learning of its inclusion through media reports in May 2025, which caused significant stress and anxiety for him and his family. The land is currently used for beef farming, and no assessment has been made of how adjacent industrial development could affect farming activities or animal welfare. And so the stress continues for him.

Part of the remaining land within site NES36 is owned by [redacted], with an additional acre owned separately by his family. This land was promoted by JEH Planning without the owner's knowledge or consent, meaning it was neither available nor deliverable at the time. [redacted] has since indicated a willingness to cooperate with a developer, but he is under no obligation to sell or develop the land. Despite other sites being rejected as undeliverable, NES36 continues to be pursued even after losing 12 acres. When buffers and topographical constraints are considered, the truly developable area is significantly reduced.

NES36 borders Smithy Wood, and development would risk isolating the woodland from the Blackburn Brook corridor. While this is briefly acknowledged in the modification document, no clear criteria or safeguards are provided. At the inspectors meeting, which I attended in relation to site NES36, discussions referenced measures such as a "hedgehog crossing," which does not reflect the level of protection expected. The suggested 15-metre buffer also falls short of Natural England's recommended 50 metres, raising concerns about the adequacy of environmental safeguards.

The site is directly adjacent to residential properties, including my home. Unlike other employment sites in the Local Plan, where zonal approaches have been used to reduce impacts on residents, no such measures are proposed here. Throughout the consultation process, I have repeatedly asked what buffers will be put in place to protect residents from disturbance, pollution, and disruption, but have been told this will be addressed at the planning stage. This lack of clarity has caused ongoing stress and uncertainty for myself, my partner and neighbours. A Local Plan should provide reassurance and clear parameters, not defer key decisions.

Cowley Way is addressed as Chapeltown and Jumble Lane to the South of the site is classed as Ecclesfield. Development of NES36 would effectively merge Chapeltown and Ecclesfield, eroding the distinct identity of both areas.

The Main Modification document states that development must comply with Policy SG3 to safeguard the character of the land. However, it is unclear how features such as open grassland, hedgerows, and coppices can be preserved alongside large-scale employment uses such as logistics warehousing. The site's current topography is unsuitable for such development, and significant groundworks (cut and fill) would likely be required, fundamentally altering the landscape.

An ecological survey has been undertaken, but it appears inadequate. It misidentifies tree species, omits veteran trees and active animal setts, and does not reference local bat populations. The survey was also conducted at a sub-optimal time of year following prolonged drought, which may have limited the presence of indicator species.

For these reasons, I believe site NES36 should be removed from the Local Plan, with alternative—preferably brownfield—sites identified for employment use.

REF5.0352

Outlook

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

From [redacted]
Date Mon 2026-05-04 10:34 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,

V Palmer

REF5.0353

Outlook

Objection to Sheffield Local Plan Main Modifications (MM410 and MM411)

From [redacted]
Date Mon 2026-05-04 10:56 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[redacted]

Dear Sir/Madam,

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

I do not believe these main modifications are sound. In particular, there does not appear to be a clear or deliverable plan for the supporting infrastructure that would be required, especially in relation to healthcare provision.

From my own experience, local services are already under significant pressure. It is currently difficult to secure GP appointments, and I am concerned that additional development will worsen this situation further. There is no clear evidence that this increased demand will be properly addressed.

Traffic in the area is already an issue, and further development will inevitably increase congestion on roads that are already busy. This will have a direct impact on daily life and local air quality.

The loss of Green Belt land is also a major concern to me. I regularly use these areas for walking and relaxation, and they play an important role in my health and wellbeing. Once this land is lost, it cannot be replaced.

More broadly, I do not feel these proposals have been thought through in a fair and logical way. It appears that a disproportionate burden is being placed on one particular area of the city, which does not seem justified.

For these reasons, I strongly request that these sites are removed from the plan and that the land remains designated as Green Belt.

Yours faithfully,
Margaret Hall

Sent from my iPhone

Outlook

Objection to Sheffield Local Plan Main Modifications (MM410 and MM411)

From [redacted]
Date Mon 2026-05-04 11:01 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[redacted]

Dear Sir/Madam,

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

I do not believe these main modifications are sound. In particular, there does not appear to be a clear or deliverable plan for the supporting infrastructure that would be required, especially in relation to healthcare provision.

From my own experience, local services are already under significant pressure. It is currently difficult to secure GP appointments, and I am concerned that additional development will worsen this situation further. There is no clear evidence that this increased demand will be properly addressed.

Traffic in the area is already an issue, and further development will inevitably increase congestion on roads that are already busy. This will have a direct impact on daily life and local air quality.

The loss of Green Belt land is also a major concern to me. I regularly use these areas for walking and relaxation, and they play an important role in my health and wellbeing. Once this land is lost, it cannot be replaced.

More broadly, I do not feel these proposals have been thought through in a fair and logical way. It appears that a disproportionate burden is being placed on one particular area of the city, which does not seem justified.

For these reasons, I strongly request that these sites are removed from the plan and that the land remains designated as Green Belt.

Yours faithfully,
Margaret Hall

Sent from my iPhone

REF5.0354

Outlook

Response to the main modifications consultation for the Sheffield Local Plan

From [redacted]
Date Mon 2026-05-04 11:00 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>
Cc [redacted]

I am submitting my response to the main modifications consultation as ward councillor for Woodhouse and Handsworth. I support my fellow ward Councillor Mick Rooney's submission, but have the following serious concerns to add:

1. MM184

This modification creates a circular process where development on the best and most versatile agricultural land is only permitted where the site is allocated for development. This is proposed on the basis that "agricultural land value has been taken into account when deciding to allocate the site".

However no accurate assessment of the agricultural value of the land released from green belt was made when deciding to allocate the sites.

Planning policy should protect high quality agricultural land from loss to development. The new predictive Agricultural Land Classification map makes the most accurate data publicly accessible. This clearly shows that some of the sites allocated for development contain grade 2 and 3a agricultural land.

MM184 permits unjustified release of sites by allowing sites to be released based on inaccurate assessments of agricultural land value. I consider this to be unsound as it is not consistent with the requirement of planning policy to protect high quality agricultural land.

2. The council's own *Integrated Impact Assessment Report Addendum: Modifications Consultation* concludes that the modified plan ranks worse than the originally submitted plan in relation to:

- Soil and Land
- Landscape and Townscape
- Biodiversity and Geodiversity
- Natural Resources and Pollution
- Transport and Accessibility

These problems are particularly evident in relation to sites SES30 and SES29, MM411 and MM410

3. MM411 - SES30

This modification is not justified because:

- The distribution of affordable housing is heavily skewed, which means this aspect of the plan is not positively prepared. SES30, for example, is expected to deliver 434 affordable homes, which is more affordable housing than the entire South West is set to gain from its Green Belt allocations. This is in direct contradiction to Council Policy NC3, which states that the South West has a far greater requirement for affordable housing than the South East, where SES30 is located. The Council cannot claim that this site allocation strategy matches its own policy, as it will widen the gap still further between the parts of the city that can afford to buy and the parts that cannot.
- There is no evidence that the required 10% bio net gain is achievable. The council's own ecological assessment suggests the site could be registered on the national register as a BNG habitat site – how can its biodiversity possibly be improved by development?
- Viability of the site is doubtful given the watercourse, ancient hedgerows and trees that are required to be protected and the need for SUDs.
- The allocation of land for a school and burial site is purely a planning place marker that can be removed at the first review. This weakens the case that there are exceptional circumstances to release this site from the green belt.

- Agricultural land on this site is mostly grade 2 with the remainder 3a, with some 3b to the Southern edge. In contrast, the Ryecroft Farm site, which was not considered for release even though it could provide an equivalent number of homes in an area very short of affordable housing, is grade 4 land.

4. MM410 - SES29

This modification is not justified because:

- This allocation adds to the problem of affordable housing being in the wrong place, as stated in my statement of opposition to modification MM411.
- The viability is questionable, given factors such as the areas of contamination, the old mine workings, the need for ecological buffers for adjacent wildlife sites, and the watercourse.
- There is no up-to-date and accurate ecological assessment, so how can the required 10% BNG be assured?
- The site is nearly all grade 3 agricultural land.

5. For both MM410 and MM411 the IIA states:

“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. The accompanying site policies require consideration of landscape character and environmental improvements, which will help to mitigate effects somewhat, but residual negative effects are likely to remain.”

Also, the IIA states “the cumulative scale and distribution of growth across Green Belt sites in and around north-east Sheffield, Grenoside and Handsworth ***is likely to*** increase private vehicle and HGV movements in these areas, placing additional pressures on an already congested local highway network”. However, it also states that adding more development by releasing SES30 and SES29 only “***may***” enable better strategic interventions to improve transport. The negative impact is likely, the mitigation only a possibility.

The IIA is also the only official document I have seen that even begins to acknowledge the social, health, and wellbeing impact of releasing these sites:
“Surrounding communities do value the Green Belt land that is now proposed for allocation, and these sites have formal and informal footpath access. The loss of this green and open space does therefore have some negative effects in terms of mental health and wellbeing.”

For these reasons I think both MM411 and MM410 are unsound. I request that site SES29 and site SES30 are removed from the plan and remain green belt.

Yours faithfully,

Alison Norris

Alison Norris
Councillor for Woodhouse and Handsworth
[redacted]

REF5.0355

Outlook

Consultation Response Main Modifications

From [redacted]
Date Mon 2026-05-04 11:06 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

1 attachment (789 KB)
Nicola Letter.docx;

External email

Please find attached my response to the Sheffield Plan Major Modifications Consultation.

Many Thanks

Nicola Siddall
[redacted]

Miss Nicola Siddall
[redacted]

4th May 2026

Strategic Planning Team
Planning Service
5th Floor
Howden house
Sheffield
S1 2SH

Re- Main Modification 353 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 MM353 in relation to Site NES39 land at Wheel Lane and Middleton Lane.

The total housing capacity of 66 homes has been more than halved from the original plans. Two other parcels of land have been removed from the site allegedly due to 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 I agree with this decision, I also do not understand how the remaining connected parcel of land does not contribute to the character and setting of the local area. See figure 1 part of parcel removed and figures 2 and 3 remaining land to be built on.



Figure 1Removed parcel of site NES39



Figure 2 Remaining parcel of site NES39 to be built on

The slope of the remaining parcel (which is currently two separate grazing fields) actually slopes quite steeply in three separate directions, to the North towards the designated wildlife site, to the West onto Middleton Lane and the protected hedgerows and to the East again towards the hedgerows and the removed parcels of land.



Figure 3 Remaining parcel NES39 to be built on

The remaining parcel if anything contributes more to the character of the local area as it can be seen from many parts of Grenoside, where as the removed parcels of land can only be seen from either Wheel Lane (where figure 1 was taken from) adjacent to the site or Cinder Hill Lane at the rear of the site.

Having read through MM353 there are numerous mentions of "Golden Rules" but nowhere in the Main modifications that clearly state what these compensatory improvements are in terms of this specific site. This leads me to question the soundness of the whole plan and main modifications, there is no evidence of the modifications being positively prepared or justified in relation to why parts of the site have been dropped from the plan while other parts are still there.

The National Planning Policy Framework (NPPF) says that planning should contribute to protecting and enhancing our natural, built and historic environment yet these main modifications and the Integrated Impact Assessment Report (IIA) clearly state that the natural and historic environments contained in site NES39 will be in a worse state and in fact will be lost totally under these plans.

At no point has any mention been made about future plans, what happens after 2039 when more land is needed for further homes or employment, future generations need to have the Green Belt protected now so that it is there for them.

To conclude I do not believe that the release of Green Belt Land in Sheffield is legal or sound and urge the City Council and the inspectors to remove all Green Belt Land from the plan.

Yours faithfully,

[redacted]

Miss Nicola Siddall

REF5.0356

Outlook

Response to the Main Modifications consultation MM411 on city-wide issues and site SES30

From [redacted]
Date Mon 2026-05-04 11:13 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Sir /Madam,

I just fail to believe that the evidence already available has overlooked the access issues to the above site. The roads around the area are already gridlocked on a daily basis since the building of the new Lidl. There has been no improvement in road infrastructure. In relation to the planned site, safe and suitable access has not been demonstrated. I drive around the area every day and in my opinion the council just don't care about the impact access to the planned site will have on residents.

Also in relation to the use of this greenbelt area (SE30). The council have not put forward any evidence that holds up which supports their statement that 'the golden rules apply' when this is a complete lie. It is a lie because there is no evidence to support a new school and there is no evidence this land can support a multi faith burial ground. The Plan should not be removing land from the Green Belt on the basis of uses that will never happen.

I walk through the SE30 site frequently and it is a haven for wildlife. I am very concerned that the plan to develop the area for housing will destroy this beautiful piece of green belt. The Council's own ecological assessment assigns high importance to every area of habitat on the site. It even suggests the site could be registered as a Biodiversity Net Gain (BNG) habitat site on the national register, which is the opposite of building on it. I ask where is the evidence for the required 10% BNG? What is the actual impact on wildlife. It is certainly not in MM411.

The whole plan and suggested modifications are ineffective. I am now retired and have lived in Sheffield all of my life as generations of my family have done before me. In fact I wouldn't be surprised if my ancestors were here when Sheffield was born. I am so proud of my city and its place in history, yet these plans and the way that the council tried to get them quietly through without challenge makes me ashamed. I am deeply worried that Inspectors did not reject the Sheffield plan at the first hurdle given the overwhelming evidence that this plan was unsound.

This whole idea that S13 greenbelt (as depicted in the Sheffield Plan and subsequent MM410 and MM411) should be developed for housing is wrong wrong wrong. Any civilised human being can see that it is wrong so it does make me wonder what those who propose the plan would gain from it. The truth will out at some stage in the future as to why this plan was put forward wiping out S13 greenbelt without adequately re assessing brownfield sites in the city or housing in the city currently not used. But of course why would a builder want to put up a few houses on multiple sites when they could put many houses on single large sites. It does make me wonder what discussions have taken place behind closed doors. And why do I think this? Well it wouldn't be the first time that Sheffield City Council have lied to its residents would it.

"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."

Steven Dale
[redacted]

REF5.0357

Outlook

Objection to ss12 Sheffield plan

From sharon Driver [redacted]
Date Mon 2026-05-04 11:23 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

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 35(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 45/800), which could deliver a further 348 homes alongside shops or a care facility. It is significant that the landowner, promoter and developer for site 45/800 are the same as for SS19, yet NEDDC has assessed 45/800 as unsuitable for development due to the same constraints repeatedly raised in relation to SS19.

The development of 45/800 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

Sent from my iPhone

REF5.0358

Outlook

NWS31 - Wharncliffe side 'Horse field' - Objection to modifications to plan

From [redacted]
Date Mon 2026-05-04 11:40 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Planning Inspector,

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

GREEN SPACE AND ACCESS

My highest personal objection relates to the removal of green space, when full consideration has not been given to the use of brown field sites or other housing solutions across the city, and I would like to see this site and other green belt removed completely from any development plan.

Specifically relating to our much loved 'Horse field', my objection is to reduced access to Green space for older and less mobile residents and accessible area for children with disabilities to free play, this space has been a huge part of our family life since coming to Wharncliffe side and a major reason we located here. My daughter [redacted] and this space has given her access to to peace & quiet, a multitude of wildlife within a short walk, this will disappear completely, the walk will become through a housing estate to a very small play park, which will be more than the stipulated 300m walking access to green space for people with protected characteristics.

The modifications are therefore neither sound or legal and I do not believe that a full assessment of the impact and importance of this comparatively small area of green belt on our community has been undertaken.

The council should be obligated to work with community groups to ensure the need of local resident are met.

WILDLIFE

Modifications are not sound as there is no mention of protected species, we see regularly bats, owls, deer, many different birds, hedgehogs, diverse insects and grasses.

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.

ACCESS TO THE SITE

The modifications proposed are not sound, there has not been enough consideration or full assessment given to access issues from don avenue

In terms of building, I see already congestion regularly with small increases to traffic eg bin days or delivery drivers, for a site of this size consideration should be given to more than one access point, given the likely number of hgv's etc.

Local roads are already heavily 'potholed' and consideration needs to be given to this.

Thankyou for taking the time to consider this representation,

Kind regards

Emma Smith

[redacted]

REF5.0359

Outlook

Modification Ref MM410 & MM411

From [redacted]
Date Tue 2026-05-05 12:48 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

As I resident of S13 I would like
to object to the main modifications proposed to the Sheffield Local Plan, particularly MM410 and MM411, which relate to the SES29 and SES30 sites.

I consider the allocation of Handsworth Hall Farm (SES29, 870 homes) and Bramley Lane/Beaver Hill Road (SES30, 827 homes, school and burial site) for development in S13, to be unsound. They are not effective, not justified, and not
consistent with national planning policy and I request the removal of both sites from the Local Plan.

• **Roads -** The MM411 requires that the traffic from the 827 houses, (School and Burial ground, which there are no plans of so far!) would have to use Beaver Hill Road.
The Fire Training Centre and Woodhouse Juniors FC use this road for parking, as well as a main car and bus route between Woodhouse and Handsworth.
The development policy of the site says access is "subject to further transport assessment" , acknowledging the access problems still remain unresolved.

The Council's own transport modelling shows the Retford Road /Beaver Hill Road junction would be at 98% capacity by 2039, even with improvements.
Handsworth Grange Road would become a rat-run. Without improvements, that junction exceeds 150% capacity.

That means gridlock.

This shows safe and suitable access for a development of this scale has not been demonstrated.
There are already serious traffic and road safety issues in the area.

Also, all traffic going to Handsworth would pass metres from Handsworth Grange School, putting schoolchildren at risk of poor air quality, leading to health issues including asthma and respiratory issues.

• **GP Capacity -**
Healthcare infrastructures are unconfirmed, underfunded and undeliverable.

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

For SES29, the same assessment states explicitly that "nearest sites not suitable" and that Olive Lane capacity is again expected to be exceeded, with "more detailed planning required for a solution to be determined in consideration of neighbouring Local Authority plans."
These are the ICB's own words. There is no confirmed solution. There is no funded solution. There is no deliverable solution within the plan period.

The Infrastructure Delivery Plan, identifies the mitigation for both sites as reconfiguration of existing GP surgeries, specifically the addition of two to three consultation rooms per practice. The GP surgeries serving Handsworth are located in converted residential buildings
directly adjacent to busy roads. They have no surrounding land available for extension. There is inadequate parking for current patient volumes, let alone the significant additional patient numbers that would result from these developments. There is no physical footprint available for the kind of expansion that would be required to add clinical rooms, waiting space, accessible facilities, and accommodate required staffing.
Woodhouse medical centre – Woodhouse does have parking, but it is small and mainly taken by staff who work
at the surgery. The parking surrounding the surgery now is often chaotic and causes disruption to local residents who live there. If this is the primary GP catchment for SES30 you can only assume that many patients would rely on cars to access this surgery due to the location)
The IDP addendum states that reconfiguration is required but does not demonstrate that it is achievable at these specific premises. Asserting that existing surgeries
can be expanded is not evidence that they can be. For the plan to be sound, mitigation must be credible and deliverable, not assumed.
I ask the Inspectors to please give our community reassurances by requiring
evidence that the proposed expansion of these premises has been assessed for feasibility, including building surveys, land availability, and planning constraints.
In the absence of that evidence, the mitigation cannot be considered
credible and the modifications cannot be considered effective.

• **Loss of green belt**-
The Plan fails to Comply with the Environmental Assessment Regulations
Under the "Environmental Assessment of Plans and Programmes Regulations 2004", the Council must demonstrate that all reasonable alternatives have been assessed.
The Council has "not demonstrated that brownfield alternatives were fully assessed" before allocating greenfield land in S13.
The Integrated Impact Assessment (IIA) or Habitats Regulations Assessment (HRA) does not specifically evaluate the S13 site.

The Council has not shown evidence of sufficient cooperation with neighbouring authorities (Rotherham, Derbyshire) regarding housing numbers or land supply.
The allocation of greenfield land in S13 is "unlawful" because cross-boundary alternatives were not explored fully.

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

MM411 says ‘compensatory improvements’ should be delivered, according to the Golden Rules.
Exam 197 says potential improvements could be to rights of way in the local area
The council has not shown how 10% net gain in biodiversity could be achieved for SES30 (as required by Environment act). The council’s own ecological assessment suggested the site could be used for national biodiversity schemes, rather than development.
No protected species surveys were conducted before allocation. The 15m buffers required by MM411 for the ancient woodland, grassland and wildlife site adjacent the fields is totally inadequate.

• **Farming -** The fields have been used for arable farming for centuries. The council has not shown its avoidance to destruct the best and most versatile farmland.
MM184 removes the requirement to even conduct soil surveys on greenbelt land allocated for development.
These fields are predicted to be among the best and most viable farmland in the country, according to DEFRA. Developing them will compromise food security- there are other locations with poorer soil which should be developed
Many factors reduce the area of available land for development - like mining, hedgerows, flood risk but none of this has been properly taken into account.
For the Plan to succeed on its own figures, the Council expects 150 homes a year to be built on the site. That is far above normal rates for a site this size (typically 60-70). The nearby Waverley development (4,000 homes, multiple builders) only manages about 150 a year on a huge, flat brownfield site with no ecological or landscape constraints.
9 hectares of Green Belt are being set aside for a school (5 ha) and a burial ground (4 ha). But neither use is confirmed.
At the hearings, the evidence showed the school may not be needed - the Council's education department says its preference is to expand existing schools. No evidence has been produced to show the site is suitable for burials.
The modification says that if these uses are not needed, the land will be "Reconsidered at the first plan review"
• The most likely outcome? More housing.
That could push the total on this site to well over 1,000 homes.
The Plans numbers don't add up

The NPPF says Green Belt should only be released in exceptional circumstances. The exceptional circumstances for releasing this land include a school and burial ground. If those uses don't happen, the justification for releasing the Green Belt disappears - but the land will already be gone.

This is Green Belt release by the back door.
The Plan should not be removing land from the Green Belt on the basis of uses that will never happen and to deliver housing that is not part of the plan.

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.

Thank you for taking the time to read my objection.

Regards
Kay Dyche
S13 Resident.

REF5.0360

Outlook

Objection to Sheffield Plan SES30 and SES29 Ref1.2081 and Ref1.2139

From [redacted]
Date Tue 2026-05-05 12:50 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

To Whom it may Concern

I submit my further OBJECTIONS to the Sheffield Plan relating to SES30 and SES29.

OBJECTION to SES30
1) I am very unhappy that an area already badly effected by high levels of vehicle pollution and congestion, that currently massively exceeds Sheffield City Council's own Clean Air Zone (CAZ) targets with no proposals for reduction and, also the World Health Organisation NO2 levels(3 to 4 times higher), is being proposed to be a suitable site for a further 868 new houses and a school.
The air quality in this area has been a cause for concern for over 40 years with high incidences of physical and mental health issues related to vehicular and coal pollution.
The Sheffield City Council reports, so far, on viability of the proposal covering access, pollution, congestion, infrastructure, environment and health are not detailed and do not appear to fulfil the requirements of current legislation.

2) There does not appear to be any proposals in the Plan to save the already identified by Sheffield City Council reports as "high ecological importance" sites within SES30.

I submit that the Main Modification MM411 Sheffield Plan proposal for area SES30 is UNSOUND.
I request that the area of SES30 be removed from the Plan and kept as Green Belt.

Please notify me of the Inspectors report and the adoption of the Plan.

OBJECTION to SES29 of the Sheffield Plan.
I continue to object to the use of SES29 of the Plan to build 870 houses.

1) Coal mining using deep shafts and long tunnels was the previous use of this site.
Is it safe?
The prospects of coal dust during building works and infrastructure creation, the increase in school runs with further congestion of "rat runs" adding more vehicle pollution in the Handsworth area does not seem to have been reported on by Sheffield City Council.

2) The building of 3,000 houses and infrastructure at Waverley and the current creation of a new railway station next to SES29 has already meant a large loss of green space and habitat for wildlife in this area.
The development of SES29, a very large site, will add further pressure on to the environment and wildlife.
Sheffield City Council does not appear to have comprehensively answered these issues inline with legislation or the spirit of green policies.

I consider the Main Modification MM410 for 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.

Please notify me of the Inspector's report and the adoption of the Plan.

Miss Margaret Osborne

Sent from my iPad

REF5.0361

Outlook

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

From [redacted]
Date Tue 2026-05-05 7:10 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 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 were 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, 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 Green Belt 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 of 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, MM227 – 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 do 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. However, 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: it 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,
Miss Emily Hoare

REF5.0362

Outlook

Objection to NWS31

Fro [redacted]
Date Tue 2026-05-05 7:31 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Sirs
I would like to object to the use the Horsefield in Wharncliffe Side to build housing. As well as losing valuable green belt land and space I personally use for mental wellbeing. I am concerned about the increase in traffic to the village. Brightholmlee Lane, Dixon Road and Don Avenue already struggle with the present traffic. Dixon Road and Don Avenue are often difficult to negotiate with vehicles parked on both sides especially at school drop off and pick up times. I am concerned that this would have to be the route for site access bringing heavy vehicles through the village putting all residents in danger especially the school children. Once completed the extra vehicles of the new residents would make the roads extremely busy and there would surely need to be new access roads or traffic controls introduced.
Regards
Robert Rabjohn

Sent from Outlook for iOS

REF5.0363

Outlook

Representation on main modifications MM410 and MM411

From [redacted]
Date Tue 2026-05-05 7:39 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

I am writing to express my objections to the above modifications to the plan to build on Green Belt sites in Handsworth.
The local health care services in the area, including GP practices, dental practices, and pharmacies, are already under strain and obtaining appointments or even registration with certain services is already challenging for current residents, which negatively impacts physical, emotional, and mental health. Increasing the local population by several thousand, when there is no clear or deliverable plan for improving healthcare infrastructure, will increase this negative impact and put the health of all residents at increased risk. This is unacceptable, particularly given that it will have the greatest impact on those unable to afford private health care.
In addition to this, removal of the Green Belt land, used by so many residents for exercise and therapeutic time in natural surroundings, will in itself worsen their physical and mental health. If residents have to drive to access green spaces, this will add to increased traffic and further decline of air quality, which will already be heavily impacted by increase from new residents. Some residents do not drive and will be dependent on public transport to access green spaces, which many will be unable to afford in the current economic climate. This is another clear example of the poorer and more vulnerable members of society bearing the brunt of the loss of green space. The traffic in the local area is already very heavy at peak times and affects journeys to work and schools, and an increased number of school journeys will be made by car if the plan goes ahead, as local schools are already oversubscribed.
It is not enough to rely on potential future modifications or improvements to the plan. These may not happen. To go ahead with the plans with no clear, realistic, or achievable plans to safeguard the health of current or future residents is reckless and negligent in the extreme and should not happen. Therefore this plan should not go ahead, and I hereby request that you consider the health of the population you serve and remove these areas from the plan and allow them to remain Green Belt.

Sincerely
Rachael Nixon

REF5.0364

Outlook

CEG Greenbelt Campaign Group - Main Modifications Representation (May 2026) Please acknowledge Receipt

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

1 attachment (2 MB)
2026.05.04 CEG Main Modifications Submission to Inspectorate.pdf;

External email

Dear Planning Department,

Please find attached the representation submitted on behalf of the CEG Greenbelt Campaign Group in response to the Sheffield Local Plan Main Modifications consultation (May 2026).

This submission sets out our formal objection to Main Modifications MM350–MM353 and MM459–MM461, including detailed evidence on cumulative impacts across Chapeltown, Ecclesfield and Grenoside, and site-specific assessments.

For ease of reference, the document includes:

- An executive summary outlining our principal concerns regarding soundness
- A cumulative impact assessment across the site cluster
- Individual site representations (CH03, CH04, CH05, NES36, NES37, NES38 and NES39)

We would be grateful if you could **acknowledge receipt of this submission.**
Should any further clarification or information be required, please do not hesitate to contact us.
Yours faithfully,

CEG Save Our Greenbelt Campaign Group

SHEFFIELD LOCAL PLAN EXAMINATION

SHEFFIELD PLAN MAIN MODIFICATIONS CONSULTATION MAY 2026

CUMULATIVE IMPACT OF GREEN BELT SITE CLUSTER ACROSS CHAPELTOWN, ECCLESFIELD & GRENOSIDE

Submitted to: Sheffield Local Plan - Inspectors

Subject: Objection to Main Modifications MM350–MM353 and MM459–MM461

Date: 04 May 2026

Respondent: CEG Greenbelt Campaign Group

Email: [redacted]

Contents

Executive Summary 2

CH03 (Warren Lane) – MM459 8

CH04 (Hesley Wood) - MM460 17

CH05 (Strawberry Fields) - MM461 22

NES36 (Smithy Wood) - MM350 27

NES37 (Townend Farm) - MM351 35

NES38 (Holme Lane Far.) - MM352 45

NES39 (Wheel Lane/ Middleton Lane) - MM353 51

Executive Summary

This representation objects to the cumulative allocation of sites CH03 (MM459), CH04 (MM460), CH05 (MM461), NES36 (MM350), NES37 (MM351), NES38 (MM352) and NES39 (MM353). Whilst assessed individually, these sites form a single, contiguous Green Belt release area. The Plan fails to fully assess both their individual and cumulative impacts.

In summary, the Plan is unsound because:
• It fails to assess cumulative impacts (NPPF 31, 35(a))
• It fails to demonstrate exceptional circumstances for Green Belt release (NPPF 143)
• It relies on unproven assumptions regarding deliverability (NPPF 35(b))
• It conflicts with its own spatial strategy (Policy SP1 – MM10)
• It results in significant environmental, social and infrastructure harm

1. Introduction and Scope

Throughout this examination process our community has continued to engage in good faith repeatedly raise the very valid point that a site-by-site approach to impact assessment is in no way adequate to assess the real cumulative harm of the single large-scale greenbelt urban extension spanning Chapeltown, Ecclesfield & Grenoside. Although we have included site specific evidence later in this representation, we wanted to preface this representation with a reminder that of the 14 proposed Greenbelt sites across the whole of Sheffield, **7** of them sit within a 2-mile radius of each other in our community. Without a real focus on cumulative impacts, then this cannot be sustainable development, rather it is planned decimation of a community and we respectfully request the plan is paused and more time is allocated to Sheffield City Council to create a sustainable, spatially balanced and well evidenced Local Plan that delivers for the whole of Sheffield.

This representation attempts to address the cumulative and strategic implications of not doing so and proceeding with such a large scale, urban expansion zone into S35. The letter addressed by yourselves to Sheffield City Council back in February 2025 requested they looked at smaller, geographically dispersed and low scoring Greenbelt parcels. The plan they have produced is in direct contravention with those asks with over 90% of Greenbelt Land allocated within just two postcodes. For S35 alone, there are almost 1600 homes across 6 housing sites, 3 large industrial sites, 1 multifaith burial ground and 2 schools planned in our semi-rural community on some of the highest scoring Greenbelt land parcels in Sheffield. We therefore feel this plan is unsound under NPPF paragraph 35 as it is not justified, not effective, is not proportionately evidenced and is inconsistent with national policy.

2. Failure to Assess Cumulative Impact

The Main Modifications (MM350–MM353 and MM459–MM461) assess each allocation in isolation. This approach is flawed as it fails to recognise the spatial and functional interdependence between the sites and the extent to which it extends the urban

boundary significantly outward. When considered collectively, the sites will form a single urban extension with uncontained growth in edge of settlement locations. No cumulative assessment has been undertaken in relation to transport, flood risk, ecology, air quality, or infrastructure capacity. This is contrary to NPPF paragraph 31 which deems evidence must be proportionate and adequate and renders the Plan not justified under paragraph 35(a). Cumulative effect is materially greater than the sum of the individual parts and should be assessed before any Greenbelt sites are released as this is what will underpin the plan's soundness. Kicking the can down the road to individual planning application stage will simply drive a fragmented approach to impact assessment and the resultant devastating impacts for our community.

3. Green Belt Harm and Absence of Exceptional Circumstances

The sites individually and collectively perform critical Green Belt functions including:

- preventing settlement coalescence between Sheffield, Chapeltown, Ecclesfield and Grenoside
- maintaining openness
- preserving settlement identity

Their release removes strategic Greenbelt gaps, creates a continuous urban development corridor, and results in irreversible spatial change. The Plan fails to demonstrate exceptional circumstances to facilitate Greenbelt release as required by NPPF paragraph 143. By his own admission, the leader of the council has stated time pressure was the key contributor to the allocation of the proposed Greenbelt sites, which is not an exceptional circumstance. In addition, he also publicly referenced the unfair distribution of sites, and no detailed comparative analysis of alternative sites has ever been made available to show transparency in site selection. This is all evidence of direct conflict to NPPF paragraph 143.

A rushed, substandard plan is the result of the self-imposed timeline SCC set to address the Inspectors' request, when a new call for sites would likely have negated the need for any Greenbelt release. Not maintaining a current Brownfield Register is again not an exceptional circumstance for Greenbelt release and our community feel very aggrieved that this failure to execute statutory duty could cause permanent and catastrophic damage to the place we call home as well as our health and wellbeing. So much so, we produced Exam 141 for the Inspector hearings and have continued to assemble a list of other Brownfield site options as we were requested to do by the leader of Sheffield Council at the start of the process and again at the Council Meeting on 4th March 2026, none of which has ever been give due consideration. Instead, the plan relies heavily on the ‘golden rules’ rather than policy justification.

4. Conflict with Spatial Strategy (Policy SP1 – MM10)

Policy SP1 prioritises brownfield development, urban intensification and sustainable locations. The reliance on Green Belt release through MM350–MM353 and MM459–

MM461 is inconsistent with this strategy. Instead, it delivers greenfield expansion through large Greenbelt release, moves growth to edge of settlement locations, and increases reliance on car dependent developments. This proves a very direct inconsistency between spatial policy and actual allocations, calling into question the Plan's 'justified' and 'consistent' tests of soundness (NPPF paragraph 35 (c))

5. Transport and Accessibility (CO1 / ES7 – MM122)

The cumulative development of the cluster will generate significant traffic impacts, and the absence of cumulative modelling evidence to support the plan is contrary to NPPF paragraphs 104 and 111. No evidence has been provided to demonstrate that the highway network can safely or viably accommodate these cumulative impacts, and the main modifications do not address this fundamental issue of closely clustered sites that will drive significant increases in car and HGV traffic on the roads serving our communities. This element of the plan is of such a concern to our community that we commissioned an independently transport assessment that has been undertaken and submitted on our behalf by Ian Taylor (I.Eng MICE), an Incorporated Engineer and Member of the Institution of Civil Engineers with over 35 years' experience. The report identifies key risks, evidence gaps and requirements that must be addressed before the allocations it references can be considered sound. The main modifications provide no means by which we can be furnished with any credible, planned and costed mitigations for the increased congestion on our already congested and physically constrained roads.

6. Flood Risk and Drainage (ES1 / NPPF 158–175)

The sites referenced in this representation are located within the same hydrological catchment. Once again, the Plan relies on site-specific assessment rather than cumulative modelling which puts communities at risk, particularly in areas already evidenced to have existing flooding issues due to the land topography and soil types (clay). Most of the proposed developments are planned for areas in elevated positions above flood prone areas. The main modifications do not address this cumulative drainage issue and state that flood risk assessments will be reviewed at the planning application stage. In doing so, this will give no consideration to cumulative runoff, especially into the Blackburn Brook corridor. This approach conflicts with NPPF paragraphs 158-175 whereby the requirement is not only to flood risk assess the sites themselves but avoid increasing flood risk elsewhere.

7. Ecology and Biodiversity (GS5 - MM185, GS7, BG1- MM103)

Many of the sites referenced in this representation are ecologically rich and contribute significantly to biodiversity. The cumulative loss of habitats (including numerous local wildlife sites), ecological/ wildlife corridors, and impacts on ancient woodland/ hedgerows has simply not been assessed, and the main modifications go no way to mandating a more holistic assessment across the sites. A wide variety of protected species rely on these sites to sustain them, and instead of clear protections for nature being mandated in the main modifications, the Plan relies on future surveys rather than evidence at plan stage. This is a significant weakness in the plan making process with non-committal wording such as 'explore' and 'where feasible' that will result in fragmented habitats

which is inconsistent with NPPF paragraph 180 and the reduction in ecological connectivity (GS7 policy inconsistency). There are no credible BNG measures detailed to align to the Environment Act either on a site by site or cumulative basis and de-prioritising these to planning application stage means there is an assumption that this can be achieved, it has not been demonstrated or evidenced.

8. Air Quality and Public Health (ES7 - MM122)

No cumulative air quality assessments or modelling has been undertaken, and the main modifications have failed to request the establishment of air quality baselines for the proposed sites referenced in this submission. Considering the likely prevalence of reduced air quality already, due to proximity to major arterial roads such as the M1 and A61, as well as the existing traffic congestion on local roads, this is a major concern for the health of our community. Those most vulnerable to poor air quality such as the elderly (high proportions in S35) and children (a few of the developments proposed adjacent to or near schools) are having their health put at risk as a result.

Increased traffic and HGV movements will result in higher emissions, especially when roads become congested. This is compounded with the serious public health risk of known sites that are contaminated, creating airborne poisons if the ground is disturbed (can travel up to a 3-mile radius). This is not safe development and conflicts with NPPF paragraph 185 to protect human health by preventing unacceptable pollution and the plans' own climate and air quality objectives. With no baseline air quality measures in place now, no assessment of cumulative air quality and associated health impacts can be undertaken; this is a huge concern that the future health of our community is not being taken into account with the main modifications, especially considering measures such as plant more trees, use electric cars and the use of public transport were offered as the only mitigations by Sheffield City Council at the Inspectors Hearings.

9. Infrastructure and Services (NPPF 20)

No evidence has been provided to demonstrate that healthcare and community infrastructure can support the cumulative scale of development. An increase in population will further exacerbate the strain on the services such as GPs, Dentists and hospitals in the area. SAPA 2 was a key delivery to underpin the healthcare provision in the area, and this has now been cancelled. Since then, no further cumulative healthcare assessments have been undertaken, and a footnote was added into the IDP for 2 additional consulting rooms with no plan on how or when these will be delivered or staffed. This is key infrastructure that should be detailed at plan making stage for such a significant cluster of development, and the main modifications go no way to address closing this gap in service provision to accommodate the huge uplift in population for the area. The Plan therefore fails to meet NPPF paragraph 20 (d).

10. Amenity (DE1), Community (NC14/EC6) and Long-Term Impacts (NPPF 8 & 92)

The cumulative impacts including noise pollution, light pollution, visual harm, loss of access to nature and prolonged construction disruption (likely to exceed a decade) will have on our community and the local wildlife are immeasurable. These impacts affect community cohesion as well as residents' wellbeing and quality of life, contrary to NPPF paragraphs 8 and 92, particularly for the farmers whose livelihoods are at risk because of this Plan. Proportionate development breathes life into communities; overdevelopment destroys them. Paragraph 92 of the NPPF drives healthy communities; the plan for our community is in direct contravention with this and the overall aim of the Sheffield Plan.

11. BMV (GS4)

DEFRA's Predictive Agricultural Land Classification mapping indicates that approx. 50% of the proposed land in our area are likely to be Best and Most Versatile (BMV) land, much of which is in active agricultural use. National planning policy requires that such land is protected, and its loss should be avoided where possible. The Main Modifications remove the requirement for site-specific agricultural land assessment prior to development, effectively accepting the loss of BMV land in principle without clear justification. This further undermines the robustness of the allocations, particularly given the number of sites dismissed in the West of Sheffield where land quality according to DEFRA ALC is grade 4 or below. The loss of productive farmland also raises wider concerns regarding food security and sustainable land use. This is reflected in national policy direction and public statements, including comments made by the Prime Minister in Parliament on 7 January 2026 where he stated that "we will not be ploughing up farmland" indicating that development should avoid unnecessary loss of farmland. In this context, the release of large volumes of productive agricultural land is inconsistent with those objectives and conflicts with NPPF paragraph 174 (b)

12. Deliverability and Effectiveness (NPPF 35(b))

Multiple sites are subject to constraints including topography, mining, flooding, contamination, ecological constraints, and access limitations. All these factors can significantly impact the net developable area within a site and the viability of doing so and therefore risk the Plan numbers by way of housing and employment land being overstated. The Plan defers resolution/mitigation of these issues to the planning application stage, thereby creating uncertainty regarding delivery. The main modifications do not adjust to reflect these constraints, demonstrate more realistic developable areas from the evidence base now produced or provide robust viability evidence. Suitability and deliverability being dependent on future investigation does not make the Plan effective and undermines the housing trajectory and justification for Greenbelt release.

In addition, the main modifications focus on increased affordable housing delivery via the 'golden rules'. However, if the cumulative impact of the constraints across all the sites is considered, the viability challenges may reduce delivery of the prescribed affordable homes. We are already seeing evidence of this with developers bartering down the 'golden rule' affordable housing percentage. Building affordable homes is the key tenet of the Sheffield plan and our campaign group are very much in favour of this principle, but the homes have to be located in the right place as well as at the right price. Our

community already has a strong supply of affordable homes (unlike the West of the City), but the sites chosen in S35 are poorly located for jobs and services. Leeds and Manchester have far higher densities of homes in their City Centre's and are more aligned to the 20-minute city principle than the current Sheffield Plan. Over-provision of homes in one area deprives other areas of affordable homes and stagnates the local housing market. This is already evident with recently developed new build estates in S35 that are simply not selling.

13. Conclusion

For all the reasons set out above, particularly the lack of cumulative assessment, the Main Modifications MM350–MM353 and MM459–MM461 result in a strategic urban extension into the Green Belt without adequate justification or evidence. The Plan is therefore not justified, not effective, and not consistent with national policy. If adopted, it will create significant environmental, social, and infrastructure harm. We thereby request that the Inspectors grant Sheffield City Council the time to work with its residents to develop a more optimal and deliverable Local Plan that serves the whole of Sheffield and leaves a legacy we can all be proud of for our fabulous City.

CH03 (Warren Lane) – MM459

Introduction

This representation is submitted as a formal objection to the proposed allocation of Site CH03, including the Main Modifications.

It is considered that the allocation is unsound when assessed against the tests of soundness set out in the National Planning Policy Framework (NPPF, December 2023), specifically that it is not justified, not effective, and not consistent with national policy (paragraph 35).

1. Green Belt Harm/ Spatial Strategy

The site is a high-scoring Green Belt parcel (score 17) and forms the Boundary preventing settlement coalescence Sheffield & Barnsley

CH03 cannot be assessed in isolation as it forms a cluster of allocations with CH04, CH05, NES36, NES37, NES38 & NES39. These proposed Greenbelt sites create a significant outward expansion of the settlement boundary and result in a continuous tract of Greenbelt loss.

The Plan assesses these sites individually. However, the true planning impact is cumulative and spatial, resulting in urban extension from contained growth. This cumulative effect is materially greater than the sum of individual site impacts and has not been adequately assessed.

The Sheffield Plan clearly states that development will be focused on Brownfield land, existing urban areas and higher density development, but the allocation of CH03 demonstrates clear inconsistency with the stated spatial strategy. In practice, the plan is relying on Greenbelt release to meet housing requirements, rather than prioritising urban regeneration.

Figure 1: Settlement Separation and Green Belt Context



Figure 1 shows the enclosure of Residential Area (Green) within existing & proposed Industrial Development (Red).

The site lies on the boundary between Sheffield and Barnsley, with the administrative boundary passing through the site Green Boundary Line.

Figure 2: Settlement Separation and Green Belt Context



Development of this site would contribute to the coalescence of these settlements, eroding their separate identities. The images above demonstrate the role of the site in maintaining separation and openness.

Preventing settlement merging is a fundamental purpose of Green Belt policy (NPPF paragraph 140), and maintaining openness is a key characteristic (paragraph 139).

The release of this site from the Green Belt has not been robustly justified, particularly given the extent of constraints affecting deliverability. This conflicts with NPPF paragraph 143, which requires exceptional circumstances to be fully evidenced.

2. Landscape, Character and Visual Impacts (IIA Sustainability SA8/ SA9)

- The site is currently in agricultural use, and the tenant farmers rely on this field for Grazing and livestock feed, the loss of such land will affect the livelihoods of these tenant farmers.
- The open rural character of the site would be replaced with Industrial Units, altering long-established landscape separation and negatively affecting local amenity and the wider visual character of openness.
- Compounding the above the topography of the site is elevated and even with the proposed Buffer Zones the proposed units would shadow the adjacent residences conflicting with NPPF paragraph 191.

3. Transport, Highways and Access Constraints

Please see detailed Traffic Report by ‘Ian Taylor I.Eng MICE’ as a separate submission

The Plan promotes reduced reliance on private vehicles, increased walking, cycling and public transport use and the creation of 20-minute neighbourhoods. However, site CH03 is located on the edge of the urban area, is less well connected to key services and employment areas and is likely to result in car dependent travel patterns. This is in direct contravention of the IIA and site selection around sustainable transport.

Walking:

- There are no continuous footways on Thorncliffe Road in the vicinity of the site. A footway exists from Chapeltown centre but terminates approximately 200 metres from the site at Warren Lane.
- The route is characterised by a steep incline and high traffic volumes, making it unattractive and unsuitable for pedestrians.
- In these circumstances, walking cannot be considered a realistic or safe mode of access to the site.

Cycling:

- The site is not supported by any dedicated cycling infrastructure.
- The steep gradients and lack of safe cycling provision make the route unsuitable for everyday commuter cycling.
- References to proximity to the National Cycle Network (Route 67) are misleading, as this route functions primarily as a recreational loop rather than a practical commuter route.
- As such, cycling is unlikely to represent a meaningful or viable transport option for site users.

Public Transport:

- Public transport provision in the area is limited and does not provide a realistic alternative to private car use.
- The nearest bus stop is approximately 600 metres from the site, exceeding the commonly accepted accessibility threshold of 400 metres.
- Available services (including the M35 and 201) operate at low frequency, are limited to daytime hours and do not run on Sundays.
- Chapeltown railway station is located approximately 2km from the site, which is not convenient for regular use.
- There is no clear evidence that public transport provision can be enhanced to support the proposed development.

Private Car:

- Given the lack of viable alternatives, the private car is likely to be the dominant mode of transport.
- The site's proximity to the motorway network further reinforces car dependency, with potential for vehicle movements at unsocial hours.
- The proposed development would therefore generate significant additional traffic on an already constrained network.

Traffic Implications with current plan

- Warren Lane is a long-standing area of concern due to rat-running and inappropriate use by HGVs.
- Existing mitigation measures, including a partial one-way system, “No Entry” restrictions at the Thorncliffe Road end, an environmental weight limit and a 20mph speed limit, have not resolved these issues.
- The road continues to be used as a shortcut, particularly by drivers seeking to avoid congestion at nearby M1 junctions.
- While the one-way system restricts traffic in one direction, it still enables movement in the opposite direction and does not prevent through-traffic. The current arrangement has therefore not been effective in managing traffic volumes.
- There is no evidence to demonstrate that these existing measures would successfully accommodate additional traffic generated by development at Site CH03, including HGVs and worker vehicles.
- If traffic associated with CH03 is directed onto Thorncliffe Road, there is a clear risk that vehicles will continue to divert onto Warren Lane via existing shortcut routes.
- The cumulative impact of this additional traffic would be severe. Warren Lane is narrow, with on-street parking and constrained sections where large vehicles cannot pass safely.
- The road is already operating at or near capacity, with additional traffic arising from recent development in the surrounding area, including Birdwell and Hoyland.
- Increased traffic would exacerbate existing safety concerns, including speeding and limited visibility, particularly along the straighter sections of the road.
- The combination of constrained geometry, existing congestion and additional traffic would lead to increased risk to pedestrians and the potential for localised gridlock, particularly at pinch points such as the bridge.
- In these circumstances, Warren Lane is not suitable to accommodate the additional traffic associated with Site CH03.

This raise concerns in relation to NPPF paragraph 111, which requires that development should not result in unacceptable impacts on highway safety or severe cumulative impacts on the road network

4. Flood Risk and Drainage Issues

Flood risk has been identified as a constraint requiring mitigation.

In the absence of clear and robust evidence demonstrating that flood risk can be appropriately managed, the allocation conflicts with NPPF paragraphs 158–175, which require development to avoid areas at risk of flooding and not increase flood risk elsewhere.

The cumulative impact of the cluster of developments must be considered in relation to flood risk. The surrounding areas, including Nether Lane, Chapeltown Road, Blackburn

Brook and Ecclesfield Park, have already experienced flooding during periods of prolonged rainfall. Undertaking flood risk assessment on a site-by-site basis at planning application stage puts our community at significant risk of the cumulative impacts of the significant Greenbelt developments planned in elevated positions around the area.

The site's clay soil and sloping topography raise concerns about increased surface water runoff and downstream flood risk with the bottom of the site often being waterlogged.

5. Heritage and Setting of Listed Buildings

The site is located within an area of archaeological interest and was once part of the Historical Tankersly Deer Park (Warren). NPPF paragraphs 195–199 require heritage assets to be conserved in a manner appropriate to their significance. The absence of detailed archaeological investigation introduces further uncertainty and constraint on the developable area.

6. Ecological and Biodiversity Concerns

- The Site Allocations Schedule demonstrates that development sites require Biological Net Gain, Ecological Mitigation and Protection of Environmental features, thereby confirming the selected sites have environmental value.
- CH03 supports protected and priority/ protected species, including skylarks, bats, badgers, owls, Kestrels and a range of other birds and mammals.
- Ancient hedgerows and wildlife corridors contribute to local ecological connectivity in CH03. Again, there is a specification that Hedgerows 'must be retained' as wildlife corridors where possible as part of the master planning of the site for and within subsequent planning applications, yet this has not been specified for this site with only vague reference to 'exploring' ecological corridors and 'where feasible' BNG delivered onsite.
- No Biodiversity Net Gain strategy has been prepared, despite statutory requirements for 10% BNG and there is a lack of clear mitigation measures outlined for the loss of this undeveloped land and habitat.
- Mitigation measures cannot fully replicate the ecological function of Green Belt land and Biodiversity Net Gain does not compensate for the loss of Green Belt openness or strategic green infrastructure, particularly when factoring in the significant amount of Greenbelt within such a small radius across the local community.
- Site CH03 comprises predominantly Grade 2 agricultural land, classified as Best and Most Versatile (BMV), representing one of the highest quality and most productive land types in England.
- National planning policy (NPPF) requires that significant weight is given to the economic and other benefits of BMV land, and that where development is necessary, areas of poorer quality land should be preferred.
- The allocation of CH03 is directly contrary to this principle, as it would result in the permanent loss of high-quality agricultural land without clear justification.
- Evidence indicates that a substantial proportion of the proposed Green Belt release already affects BMV land (at least 53%). The inclusion of CH03 would further intensify this harm.

- Alternative sites within the Plan comprise lower-quality, non-BMV land, demonstrating that less harmful and more policy-compliant options are available.
- In these circumstances, the allocation of CH03 undermines compliance with national policy, fails to promote the sustainable use of land, and does not justify the avoidable loss of a high-value agricultural resource.

7. Mining and Ground Contamination/ Stability Risks

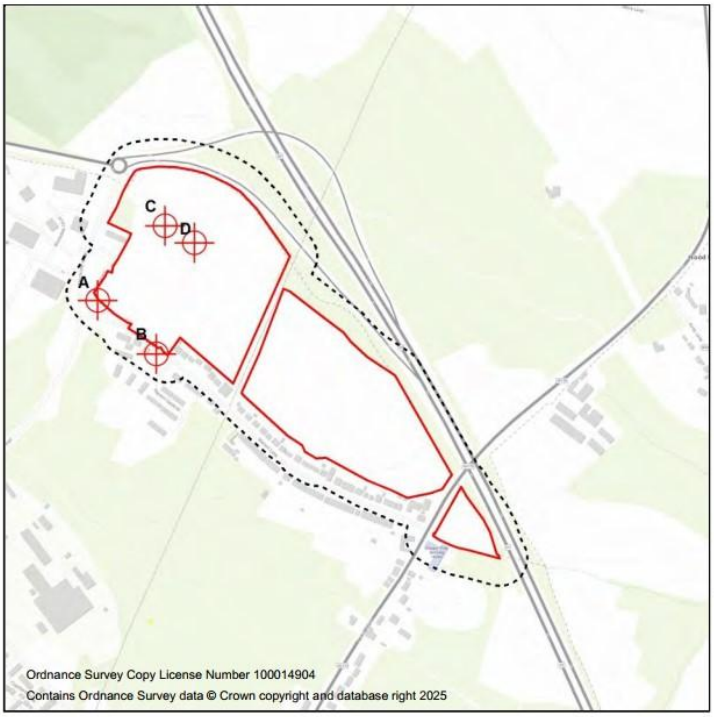
Large portions of the site fall within a Coal Authority Development High Risk Area with known mine entries and shallow workings being present on site. In addition, the site is near a historic landfill site. Coal Mining Constraints Plan (see below).

SITE LOCATION AND COAL MINING FEATURE PLAN

ADDRESS: Warren Lane, Tankersley, Sheffield, S35 2YD

SEARCH NUMBER: 473232

COAL SEARCH PLUS+
Protecting your investment



KEY

Property Boundary

50m property boundary buffer

Coal mining subsidence claims within 50m (section 7)

Mine entries within 20m (section 5)

Adits

Shafts

Symbols are indicative only and are not drawn to scale.

World Topographic Map - Sources: Esri, HERE, Garmin, Intermap, Increment P Corp, GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, © OpenStreetMap contributors, and the GIS User Community

This plan shows the location of the subject property and where relevant the location of mine entries and subsidence claims referred to in the attached CoalSearchPlus+ regulated coal mining search report. The plan must be viewed in conjunction with the detailed findings in the attached report. A coal mining risk rating, including recommended further action where appropriate, is given at the conclusion of the report. (section 8)

This plan shows reportable features relevant to the property only. Additional relevant coal mining aspects are reported upon within the report. The report and content of this plan are specific to the property under consideration. The report contents should not be used in relation to other property in the area.

Figure 3: Coal Mining Constraints and No-Build Zones

- The site is located within an area of historic mining activity and lies within proximity to a historic landfill.
- These factors introduce risks relating to Land instability, Contamination, Ground gas migration
- The mining plan identifies shafts and exclusion zones which further restrict development potential and indicate that ‘no build zones’ are likely to be required.
- Allocating the site without full investigation and resolution of these issues is inconsistent with NPPF paragraph 189, which requires land to be suitable for its intended use.
- The presence of both near to any planned development could significantly affect the site viability and deliverability and remediation works on a site with mineshafts and voids raise significant safety concerns for nearby Residences and infrastructure, including the Tankersly Railway Tunnel and line.
- The site raises serious environmental concerns. It is identified as potentially contaminated and lies within 250 metres of a historic landfill and historic mining activity. These factors introduce risks relating to land instability, contamination, and gas migration.
- The allocation of the site prior to full investigation and resolution of these issues is inconsistent with NPPF paragraph 189, which requires land to be suitable for its intended use, including safe ground conditions. This is further supported by Exam 148, which identifies potential land instability and “no build zones likely” (pages 5–6) Appendix 3.

EXAM 188 identifies CH03 as being within a Development High Risk Area, with approximately three recorded mine entries, surface mining activity affecting a significant portion of the site, and probable shallow coal workings across the site.

The Mining Remediation Authority advises that these features require detailed investigation, layout avoidance and are likely to require remediation. These constraints are site-wide and have direct implications for developable area and layout. There is no evidence that this has been reflected in the site’s capacity assumptions, meaning deliverability remains uncertain.

Buffer Constraints Plan
The plan illustrates the cumulative spatial impact of buffers, restrictions, and infrastructure constraints across the site. It demonstrates how developable land is significantly reduced when these factors are applied in combination.

8. Residential Amenity Impacts

The site lies near existing residential properties along Warren Lane and adjacent to Retirement & Care Homes.

The proposed B2 (general industrial) and B8 (storage and distribution) uses would be highly likely to generate noise, disturbance, lighting, and increased vehicle movements. These impacts would materially affect residents’ ability to reasonably enjoy their homes.

To mitigate such impacts, a landscape buffer would be required. In practice, a buffer of at least 20–30 meters (and potentially greater for industrial uses) would be necessary. However, no minimum buffer width is specified.

The requirement for such buffers would significantly reduce the developable area of the site.

In addition, local residential properties are already located within approximately 200 meters of the M1 motorway, which carries very high traffic volumes. This creates an elevated baseline of environmental stress. Additional industrial development would compound these impacts, resulting in unacceptable cumulative effects.

This conflicts with NPPF paragraph 191, which requires planning decisions to avoid significant adverse impacts on health and quality of life.

9. Physical and Infrastructure Constraints

The site is affected by several major physical constraints:

- Northern Powergrid infrastructure and associated exclusion zones
- Overhead power lines requiring safety clearances
- The Tankersley Railway Tunnel running beneath part of the site
- Limited Access opportunities to Site

These constraints prevent built development across significant areas.

When combined with required buffers, access arrangements, and mitigation measures, the cumulative effect is a substantial reduction in usable land

10. Deliverability and Phasing Uncertainty

The first completions are only projected from 2035 on this site, offering little contribution to the five-year land supply. Other sites with significantly shorter lead in times and build out periods have been proposed and dismissed without clear justifiable reasons.

A 10-year build period would impose prolonged construction disruption on residents and local Care Homes, made worse by the cumulative impacts from other planned developments in the very local area.

The cumulative effect of the constraints identified reduces the developable area from approximately 18.2 hectares to around 11 hectares.

This represents a substantial reduction of approximately 40%, fundamentally undermining the site's viability and effectiveness as an employment allocation.

11. Conclusion

Site CH03 presents substantial unresolved issues relating to Green Belt harm, infrastructure capacity, road safety, landscape impact, biodiversity, heritage, drainage, and viability. We do not believe that the main modifications proposed for CH05 provide adequate compensation or mitigation for the irreversible and permanent damage that will result should this site be allocated for development. The IIA consistently shows that

Greenfield / Green Belt sites perform worse environmentally, and Brownfield sites perform more favorably. Despite this, the Plan proceeds to allocate the site. This creates a clear and significant issue in that

the Plan selects sites that the IIA identifies as harmful, without adequately explaining why lower-impact alternatives have been rejected thereby undermining the 'justified' test of soundness as the evidence base does not support the chosen strategy.

For the reasons set out above, Site CH03 is not:

- Justified contrary to NPPF paragraph 35(a);
- Effective due to significant constraints reducing the developable area (from approximately 18.2ha to circa 11ha), contrary to NPPF paragraph 35(b);
- Consistent with national policy including paragraphs 111, 139–143, 158–175, 189 and 191.
- Demonstrably deliverable given the scale of unresolved constraints and risks to residential amenities
- It causes significant harm to Green Belt purposes and openness
- It contributes to cumulative urban expansion when considered with nearby sites
- It conflicts with the Plan's spatial strategy
- It is contrary to IIA findings, which identify environmental harm
- It is in a less sustainable, car-dependent location
- It is not supported by a robust case for exceptional circumstances

The extent and interaction of constraints fundamentally undermine the suitability of the site for allocation.

It is therefore respectfully requested that Site CH03 be removed from the plan.

CH04 (Hesley Wood) - MM460

1. Green Belt Harm / Spatial Strategy

- The allocation of Site CH04 represents a significant and unjustified release of land from the Green Belt. National policy, as set out in the National Planning Policy Framework, requires that Green Belt boundaries should only be altered in exceptional circumstances and that such circumstances must be fully evidenced. In this case, the Plan fails to demonstrate that these requirements have been met.
- A fundamental weakness in the evidence base arises from the apparent failure of Sheffield City Council to maintain an up-to-date Brownfield Land Register since 2019, as required under the Town and Country Planning (Brownfield Land Register) Regulations 2017. This omission prevents a proper understanding of the availability of previously developed land and undermines any claim that all reasonable alternatives have been exhausted. In the absence of this evidence, the release of Green Belt land at CH04 is premature and unjustified.
- The site currently contributes to openness and forms part of a wider green and wooded landscape. Its elevated position reinforces its role in maintaining spatial separation and visual openness. The proposed development, comprising large-scale industrial buildings and extensive ground reconfiguration, would fundamentally alter this character and result in a permanent loss of openness.
- The reliance within Main Modification MM460 on compensatory improvements does not overcome this failure. Such measures cannot substitute for the requirement to demonstrate exceptional circumstances. The allocation therefore fails to align with the spatial strategy and national policy requirements.

2. Landscape, Character and Visual Impacts (IIA SA8 / SA9)

- Site CH04 is currently a heavily wooded former colliery spoil heap that has naturally regenerated into a mature landscape. It contributes significantly to local character, ecological value, and visual amenity. The site forms part of a wider green corridor and represents a transitional landscape between urban development and semi-natural environments.
- The proposed development would require substantial earthworks, including the removal of woodland, regrading of land, and creation of level development platforms. These works would fundamentally alter the landscape, replacing a wooded and semi-natural environment with industrial development of considerable scale.
- Due to the elevated position of the site, these changes would be highly visible from surrounding residential areas and would have a significant adverse visual impact. The scale and form of development would not be in keeping with the existing character of the area.
- There is a clear conflict with Policy GS3, which requires that development safeguards or enhances landscape character. In addition, Main Modification MM460 contains an internal contradiction, as it states that development will be confined to the Industrial Zone while acknowledging that access roads, remediation, and land remodelling will extend into the Local Wildlife Site and Urban Green Space Zones. This demonstrates that the impacts of development extend beyond the defined area and are not fully controlled.

3. Transport, Highways and Access Constraints

Independent Transport Evidence

- An independently commissioned transport assessment has been undertaken by Ian Taylor (I.Eng MICE), an Incorporated Engineer and Member of the Institution of Civil Engineers with over 35 years' experience. The report identifies key risks, evidence gaps and requirements that must be addressed before the allocation can be considered sound (full report submitted).

Summary Concerns

- The Plan does not demonstrate that safe and suitable access to the site can be achieved. Main Modification MM460 explicitly states that access is subject to further transport assessment work, indicating that feasibility has not yet been established. This is inconsistent with national policy, which requires that site allocations are supported by evidence demonstrating that access can be achieved.
- The proposed development would generate significant traffic, including heavy goods vehicles, resulting in increased pressure on the local highway network. Residential properties are located approximately 75 metres from the proposed access route, and a public house and restaurant is located approximately 85 metres away. These receptors fall well within the range at which traffic-related impacts, including noise, air pollution, and disturbance, would be experienced.
- The Plan promotes reduced reliance on private vehicles and increased use of sustainable transport modes. However, there is no evidence to demonstrate that this objective can be achieved for a large-scale industrial and logistics development of this nature. The lack of clarity regarding required infrastructure improvements, coupled with the use of non-committal language such as "may be required", further undermines confidence in the deliverability of the site.

4. Flood Risk and Drainage Issues

- The elevated topography of Site CH04 creates a direct pathway for surface water runoff toward residential areas located below. Development would require the removal of woodland and disturbance of contaminated spoil material, resulting in increased runoff and reduced slope stability.
- Rainfall interacting with exposed materials would mobilise contaminants, including heavy metals and polycyclic aromatic hydrocarbons, and transport them downslope toward residential receptors. The removal of vegetation would further increase erosion and reduce the capacity of the land to absorb water.
- These risks are predictable and arise directly from the physical characteristics of the site. However, no hydrological modelling or contamination pathway assessment has been provided to demonstrate that these impacts can be mitigated.
- Under national policy, development should not increase flood risk or give rise to pollution. The Plan does not demonstrate compliance with these requirements and instead defers assessment to the planning application stage, which is inappropriate for site allocation.

5. Heritage and Archaeological Assets

- The site forms part of a historic industrial landscape associated with the former Smithy Wood Colliery. While no designated heritage assets are identified within the site, the potential for archaeological remains related to historic mining activity cannot be discounted.
- No detailed archaeological assessment has been provided, and the impact of development on any such assets remains unknown.

6. Ecological and Biodiversity Concerns

- The site includes established woodland and lies adjacent to a Local Wildlife Site. This woodland provides important ecological functions, including habitat provision, ecological connectivity, soil stabilisation, and water regulation.
- Development would require the removal of this woodland, resulting in immediate habitat loss, fragmentation, and increased environmental risk. The Plan acknowledges that harm may occur but relies on mitigation and compensation measures.
- However, mature woodland cannot be replaced within meaningful timescales. Newly created habitats take decades to establish, and in the interim, there would be a clear loss of biodiversity.
- Under the Environment Act 2021, development is required to deliver biodiversity net gain. The Plan does not demonstrate how this requirement will be met. The proposed buffer of 15 metres to woodland areas is minimal and may be insufficient to prevent indirect impacts.
- The use of aspirational wording such as “explore opportunities” does not provide certainty that ecological impacts will be addressed.

7. Mining and Ground Contamination / Stability Risks

- The site comprises colliery spoil and is confirmed to be contaminated. Site investigations undertaken in 2012 identified heavy metals including arsenic, chromium, nickel and zinc, together with polycyclic aromatic hydrocarbons in both soil and groundwater. Groundwater samples recorded PAH concentrations of approximately 0.8 to 0.88 micrograms per litre, while soil concentrations reach levels in the thousands of micrograms per kilogram, exceeding screening thresholds for residential use.
- The site lies within a high-risk mining area and contains more than ten mine entries, together with shallow coal workings and coal outcrops. These constraints require detailed investigation and remediation.
- The Mining Remediation Authority has confirmed that development would require identification and treatment of mine entries, which may involve significant engineering works and cost. However, Main Modification MM460 does not include a requirement for a Coal Mining Risk Assessment, representing a significant omission.

- Policy ES6 requires that contamination and instability are addressed at the point of allocation. In this case, no remediation strategy or geotechnical assessment has been provided, and the Plan instead defers these matters to the planning application stage. This approach is inconsistent with policy and fails to demonstrate that the site is suitable for development.
- **Quote from Exam 188** 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 without it this site cannot be included in the plan.

8. Local Infrastructure Capacity

- The scale of development proposed at CH04 would place additional pressure on local infrastructure, including healthcare services, roads, and environmental capacity. No detailed assessment has been provided to demonstrate that existing infrastructure can accommodate this additional demand.

9. Deliverability and Phasing Uncertainty

- The allocation of Site CH04 is speculative and unsupported by evidence of deliverability. The site is subject to significant abnormal costs arising from contamination, ground instability, woodland clearance, and engineering requirements.
- Estimated costs include ground stabilisation in the range of £200,000 to £1,000,000 per hectare, earthworks costs of approximately £500,000 to £2,000,000 per hectare, and tree clearance costs in the region of £10,000 to £50,000 or more per hectare. Mine shaft investigation and treatment costs are estimated to range from £50,000 to £500,000 per shaft.
- Overall development costs are estimated to fall within the range of £1 million to £4 million per hectare, compared to approximately £100,000 to £500,000 per hectare for typical brownfield sites. This represents a cost differential of between five and ten times.
- At the same time, market demand within Sheffield is predominantly for units between 1,000 and 20,000 square feet, with an average of approximately 16,000 square feet. The proposed development at CH04, which may include units totalling up to 1,000,000 square feet, does not align with this demand.
- There is no identified developer or occupier, and comparable large-scale units remain unoccupied elsewhere. Developers are likely to prioritise less constrained and more viable sites, particularly those on previously developed land with existing infrastructure.

- The Plan does not demonstrate that the site can be delivered within the Plan period.

10. Conclusion

- Site CH04 represents a convergence of significant and unresolved constraints, including contamination, mining risk, ecological harm, hydrological risk, engineering complexity, and proximity to sensitive receptors. These constraints are inherent to the site and cannot be addressed through mitigation alone.
- The circumstances are comparable to developments on former colliery sites such as Astley Green, where significant environmental and amenity issues have arisen. However, CH04 presents an even more sensitive scenario due to its elevated position and close proximity to residential properties and a public-facing hospitality use.
- Main Modification MM460 does not resolve these issues but instead defers them to later stages of the planning process. This approach is inconsistent with the requirements of sound plan-making and fails to demonstrate that the site is suitable, deliverable, or capable of being developed without unacceptable impacts.

Final Position

- The allocation of Site CH04 is not justified, not effective, and not consistent with national policy.

Site CH04 should be removed from the Sheffield Local Plan.

CH05 (Strawberry Fields) - MM461

1. Green Belt Harm / Spatial Strategy

- The site is a high-scoring Green Belt parcel (score 17) and forms the last remaining open gap preventing settlement coalescence between the principal town of Chapeltown and the Sheffield urban area.
- CH05 cannot be assessed in isolation as it forms a cluster of allocations with CH03, CH04, NES36, NES37, NES38 & NES39. These proposed Greenbelt sites create a significant outward expansion of the settlement boundary and result in a continuous tract of Greenbelt loss.
- The Plan assesses these sites individually. However, the true planning impact is cumulative and spatial, resulting in urban extension from contained growth. This cumulative effect is materially greater than the sum of individual site impacts and has not been adequately assessed.
- The Sheffield Plan clearly states that development will be focused on Brownfield land, existing urban areas and higher density development, but the allocation of CH05 demonstrates clear inconsistency with the stated spatial strategy. In practice, the plan is relying on Greenbelt release to meet housing requirements, rather than prioritising urban regeneration.
- The justification of CH05 allocation relies on housing need and delivery flexibility but the IIA confirms that less harmful alternatives exist and there is no clear evidence that Brownfield sites have been maximised or higher density options have been fully explored. The city centre densities for cities such as Leeds/ Manchester are far higher than those being proposed by Sheffield. This should not be at the expense of Greenbelt release
- The main modifications reference that the Golden Rules will be applicable to this Greenbelt site and thereby it is expected to deliver affordable housing at a higher level that would otherwise apply elsewhere. - The developer has already challenged the 30% affordable housing target set out in the Whole Plan Viability Assessment before the site is even allocated. This gives us no confidence that there will not be a real risk of later viability-based reductions.

2. Landscape, Character and Visual Impacts (IIA Sustainability SA8/ SA9)

- The site is currently in agricultural use, and the tenant farmers attest to the quality of the land for crops (it has grown fruit in the past hence the local name of Strawberry Fields).
- One of the tenant farmers has an agricultural business that farms various sites across Sheffield and Derbyshire and confirms the site is some of the best quality land in his site portfolio. There is therefore a high likelihood this site will contain some areas of BMV land and National planning policy requires such land to be protected and its loss avoided where possible.

- We note that agricultural land surveys have been specified at planning application stage for NWS31 to ensure the development is consistent with policy GS4 despite this site not being an agricultural site. We therefore fail to understand why the same specification has not been applied to this site, which is agricultural and highly likely to contain BMV land.
- The livelihoods of both tenant farming families on the site are at risk because of this site's allocation.
- The increased risk to food security should also be factored into the sustainability assessment in the IIA.
- The open rural character of the site would be replaced with dense housing, altering long-established landscape separation and negatively affecting local amenity and the wider visual character of openness.
- Master planning of the site to address such impacts is suggested in accordance with policy NC1 but due to the topography of the site, we fail to see how this can be achieved successfully. Proposed density (approx. 40 dwellings per hectare) is out of character with the surrounding suburban landscape, and inclusion of 1-bed units suggests potential apartment blocks, raising concerns about privacy, scale, and design compatibility.

3. Transport, Highways and Access Constraints

Independent Transport Evidence

An independently commissioned transport assessment has been undertaken by Ian Taylor (I.Eng MICE), an Incorporated Engineer and Member of the Institution of Civil Engineers with over 35 years' experience. The report identifies key risks, evidence gaps and requirements that must be addressed before the allocation can be considered sound (full report submitted).

Summary Concerns

- The Plan promotes reduced reliance on private vehicles, increased walking, cycling and public transport use and the creation of 20-minute neighbourhoods. However, site CH05 is located on the edge of the urban area, is less well connected to key services and employment areas and is likely to result in car dependent travel patterns. This is in direct contravention of the IIA and site selection around sustainable transport.
- This creates further traffic and congestion in an area that already suffers due to the current road infrastructure not keeping up with previous development in the area (the area has evolved from being a village settlement, the roads have not). The main modifications reference potential contributions to the local road network, but there is simply no capacity for road improvements in and around the site due to railway bridges crossing the narrow, congested roads.

- Increased car usage in the area (and traffic congestion with idling engines) will result in higher carbon emissions and is in direct conflict with the plans' own transport strategy and with National sustainability objectives around climate change.
- It is already acknowledged in the main modifications that the site sits within 200m of a road exceeding 19,000 trips per day. As such, air quality monitoring to establish air quality baseline should be undertaken before the site allocation can be deemed sound and modelling of air quality impacts undertaken, considering the cluster of developments in the area, not just site CH05.
- Undertaking Air Quality Assessments at planning stage is too late and puts the health of the local residents at further risk of health conditions relating to poor air quality, particularly the pupils of Ecclesfield School which sits directly opposite the site.
- Road safety concerns have been raised and continue to be a major concern for the headmaster and staff at the school.
- The area has had a number of road traffic accidents involving pedestrians (including fatalities) due to narrow roads, parked vehicles, and volume of traffic.
- The public rights of way through CH05 are used by many of the school pupils as safe routes to and from school and although the main modifications specify these are to retained and included in the master planning, it is clear from the initial concept diagram provided by Limes Developments that at least two roads would need to cross the main public right of way used by pupils to traverse the site

4. Flood Risk and Drainage Issues

- Again, the cumulative impact of the cluster of developments must be considered in relation to flood risk. The surrounding areas, including Nether Lane, Chapeltown Road, Blackburn Brook and Ecclesfield Park, already experience flooding during periods of prolonged rainfall. Undertaking flood risk assessment on a site-by-site basis at planning application stage puts our community at significant risk of the cumulative impacts of the significant Greenbelt developments planned in elevated positions around the area.

The site's clay soils and sloping topography raise concerns about increased surface-water runoff and downstream flood risk with the bottom of the site itself often being waterlogged.

5. Heritage and Setting of Listed Buildings

- The site lies within the setting of Grade II listed Cowley Manor /Cowley Manor Farm and development would erode the agricultural setting integral to the heritage significance of these assets. Removing the farmland that is directly

associated with the farmstead buildings cannot be mitigated and would leave the Manor and Farm as orphaned heritage assets in a sea of modern housing.
- The site itself retains elements of medieval field patterns, (strip fields) which would also be permanently lost and again cannot be mitigated, or the harm minimised as per the suggestion in the main modifications.

6. Ecological and Biodiversity Concerns

- The Site Allocations Schedule demonstrates that development sites require Biological Net Gain, Ecological Mitigation and Protection of environmental features thereby confirming the selected sites have environmental value.
- CH05 supports protected and priority/ protected species, including skylarks, bats, badgers, owls and a range of other birds and mammals.
- Ancient hedgerows and wildlife corridors contribute to local ecological connectivity on CH05. Again, there is a specification that Hedgerows 'must be retained' as wildlife corridors where possible as part of the master planning of the site for NWS31 and within subsequent planning applications, yet this has not been specified for this site with only vague reference to 'exploring' ecological corridors and 'where feasible' BNG delivered onsite.
- No Biodiversity Net Gain strategy has been prepared, despite statutory requirements for 10% BNG and there is a lack of clear mitigation measures outlined for the loss of this undeveloped land and habitat.
- Mitigation measures cannot fully replicate the ecological function of Green Belt land and Biodiversity Net Gain does not compensate for the loss of Green Belt openness or strategic green infrastructure, particularly when factoring in the significant amount of Greenbelt within such a small radius across the local community.

7. Mining and Ground Contamination/ Stability Risks

- EXAM 188 identifies that approximately two-thirds of CH05 lies within a Development High Risk Area, with recorded mine entries, areas of surface mining and widespread probable shallow coal workings.
- The Mining Remediation Authority advises that these features require investigation and are likely to require remediation, with implications for layout and developable area. Given the extent of the affected area, these constraints are fundamental to the site's development potential. However, there is no evidence that these limitations have been reflected in capacity or delivery assumptions, and suitability remains dependent on future assessment.
- In addition, the site is near a historic landfill site.
- The presence of both near to a planned housing development could significantly affect the site viability and deliverability and remediation works on a site with mineshafts and voids raise significant safety concerns for nearby infrastructure,

including the railway line and Nether Lane bridge.

8. Local Infrastructure Capacity

- Health services, dental services and local GP practices are already overstretched; the proposal for two consulting rooms (no plan on where these will be or how these will be staffed) is wholly inadequate for the proposed scale of housing development within the local area.
- SAPA 2 was a key healthcare provision dependency for the Local Plan, and this is now no longer progressing due to constraints in utility provision.

9. Deliverability and Phasing Uncertainty

- The first completions are only projected from 2029 on this site, offering little contribution to the five-year housing land supply. Other sites with significantly shorter lead in times and build out periods have been proposed and dismissed without clear justifiable reasons.
- A 10-year build period would impose prolonged construction disruption on residents and Ecclesfield School, made worse by the cumulative impacts from other planned developments in the very local area.

10. Conclusion

- Site CH05 presents substantial unresolved issues relating to Green Belt harm, infrastructure capacity, road safety, landscape impact, biodiversity, heritage, drainage, and viability.
- We do not believe that the main modifications proposed for CH05 provide adequate compensation or mitigation for the irreversible and permanent damage that will result should this site be allocated for development.
- The IIA consistently shows that Greenfield / Green Belt sites perform worse environmentally, and Brownfield sites perform more favourably. Despite this, the Plan proceeds to allocate the site.
- This creates a clear and significant issue in that the Plan selects sites that the IIA identifies as harmful, without adequately explaining why lower-impact alternatives have been rejected thereby undermining the ‘justified’ test of soundness as the evidence base does not support the chosen strategy.

In summary, we believe site CH05 should be removed from the Plan because:

- It causes significant harm to Green Belt purposes and openness
- It contributes to cumulative urban expansion when considered with nearby sites
- It conflicts with the Plan’s spatial strategy
- It is contrary to IIA findings, which identify environmental harm
- It is located in a less sustainable, car-dependent location

- It is not supported by a robust case for exceptional circumstances

NES36 (Smithy Wood) - MM350

1. Fundamental Concerns – Suitability, Evidence & Deliverability

- The Main Modifications, including MM350, do not resolve the fundamental concerns that this allocation is not justified, not effective, and not consistent with national policy. These concerns arise not from a single issue, but from a combination of significant and unresolved problems which, taken together, call into question whether the site should be allocated at all.
- At the heart of this issue is the fact that the site has materially changed during the examination process. A significant area of land, which was included in the plan without the knowledge or consent of the landowner, has been removed, resulting in a smaller, more irregular and more constrained site. MM350 reflects this boundary change, however it does not require any reassessment of the evidence base. The allocation is therefore being taken forward on the basis of a site that is materially different from that originally assessed.
- The supporting evidence base was prepared on the basis of the original site boundary, and the Main Modifications do not require that key assessments are revisited in light of this change. This includes biodiversity net gain, drainage, land contamination, transport, air quality, noise, landscape and heritage. Instead, the approach taken through the Main Modifications is to continue to defer these issues to the planning application stage. This is a fundamental weakness in the Plan.
- While the Green Belt assessment has been revisited, this in itself highlights the issue. The Council's own evidence shows that, following the reduction in site size, the remaining land performs more strongly against Green Belt purposes. This demonstrates that the site has materially changed. However, the Main Modifications do not require any equivalent reassessment of ecological, environmental or deliverability constraints.
- At the time of the original site assessment, NES36 was already identified as having a number of significant constraints. These included major impacts on landscape, ecology, transport, air quality and contamination. The Main Modifications do not resolve these issues. In reality, the reduction in site size makes them more acute. There is now less space to accommodate mitigation, meaning impacts are pushed closer to sensitive receptors. A site that was already constrained has become more constrained, yet this is not reflected in the Main Modifications.

2. Irreplaceable Habitat and Ecological Isolation

- The Main Modifications fail to address the fundamental issue of ecological isolation. NES36 directly adjoins Smithy Wood Ancient Woodland and forms part of the wider Blackburn Brook corridor. Development of the site would result in the effective severance of this connection.

- This is not a marginal impact. It would fundamentally alter the ecological function of the woodland. National policy is clear that development resulting in the loss, deterioration or isolation of ancient woodland should be refused unless there are wholly exceptional reasons. The Main Modifications to GS5 recognise the importance of irreplaceable habitats and afford them the greatest weight, but they do not require this test to be applied at plan stage, nor do they demonstrate that it could be met.
- MM350 continues to rely on a minimum buffer and a requirement to 'explore' ecological connectivity. This is inconsistent with the intent of GS7, which seeks to protect woodland through appropriate buffering. A 15-metre buffer is only for root protection to prevent direct damage, not a functional ecological buffer. It does not address air pollution, noise, lighting or disturbance, all of which are relevant in this location. The Main Modifications elevate the importance of this woodland in policy but do not apply that standard to this site.
- Similarly, the modifications to BG1 refer to maintaining and enhancing ecological networks, but do not require this to be demonstrated at plan stage. In this case, the loss of connectivity is a direct and predictable outcome of development. The Main Modifications do not resolve this contradiction.

3. Conflict with Existing Agricultural Use

- The Main Modifications fail to address the land use conflict introduced by the boundary change. The site now directly adjoins an active cattle breeding farm, which was not the case when originally assessed as it was assumed the whole of the farm would be included in the plan without the knowledge or consent of the landowner.
- MM350 does not recognise this change or require any assessment of compatibility. The introduction of a large employment site, including HGV movements, lighting and continuous activity, is not compatible with livestock operations. A meaningful buffer would be required, which has not been accounted for and would further reduce the developable area. This is a clear example of where the policy framework, including GS7 and wider amenity policies, is not being applied in a site-specific way.

4. Impact on Existing Residential Area

- The Main Modifications fail to address the impact of this allocation on nearby residential properties. The revised site boundary is likely to bring development closer to existing receptors as there is much less developable area, yet there is no requirement within MM350 to assess or mitigate noise, traffic, lighting or general disturbance.
- This is not consistent with the Plan's own policy framework as amended. Policies NC14 and EC6 require that development avoids unacceptable impacts on sensitive uses and prevents conflict between employment uses and residential areas. Policy DE1 requires development to respond appropriately to its surroundings, including neighbouring land uses, and Policy GS3 requires that the relationship between development and the surrounding landscape and receptors is properly considered. Policy CO1 requires that transport impacts, including noise and disturbance, are taken into account.

- The inconsistency becomes more pronounced when compared with the Main Modification 459 for CH03. In that case, the Plan introduces a clear zoning approach, requiring less intrusive employment uses to act as a buffer between large-scale warehousing and residential areas. This demonstrates that the Plan recognises the need to manage the impacts of employment land through separation and land use gradation.
- No equivalent approach is applied to NES36. MM350 does not require zoning, buffering, or any form of transitional land use, despite the site being in close proximity to residential receptors and proposed for similarly intensive employment uses. There is no explanation for this difference in approach.
- The Main Modifications therefore apply different standards to comparable situations. In one case, they recognise the need to reduce impact through layout and land use separation. In the case of NES36, they do not. This creates a clear gap between the intent of the policies, as amended through the Main Modifications, and their application through MM350.
- In effect, the policy framework seeks to prevent unacceptable impacts on existing communities, but the site allocation proceeds without demonstrating that this can be achieved.

5. Reliance on Unresolved and Deferred Assessments

- A consistent feature of the Main Modifications is the continued reliance on deferring key issues to the planning application stage. For NES36, this includes drainage, contamination, highways, ecology and heritage.
- These are not minor details. They are fundamental constraints that determine whether development is possible. The Main Modifications fail to resolve this reliance on deferral and therefore do not demonstrate that the site is effective.
- This is particularly significant in this location, where the site is known to be adjacent to historic landfill and potentially contaminated land. Despite this, no detailed assessment has been undertaken, and the Main Modifications do not require one.

6. Cumulative Constraints and Reduced Developable Area

- The Main Modifications do not address the cumulative effect of constraints on the developable area. The evidence shows that, once realistic buffers are applied in line with the intent of GS5 and GS7, a substantial proportion of the site is constrained.
- This includes buffers to ancient woodland, hedgerows, agricultural land and residential areas, as well as the retention of ecological features. When taken together, these constraints significantly reduce the amount of land available for development and fragment what remains.
- EXAM 188 confirms that NES36 is subject to extensive historic mining constraints. The site lies within a Development High Risk Area and contains approximately eight recorded mine entries, alongside widespread shallow coal workings across the majority of the site and areas of surface mining activity.
- The Mining Remediation Authority advises that these features require detailed site investigation, avoidance within development layouts and are likely to require remediation. This has direct implications for developable area, layout and overall capacity. However, there is no evidence that these constraints have been

reflected in the site's capacity assumptions. Suitability and deliverability are therefore dependent on future investigation rather than established evidence.

- MM350 does not require this to be reflected in site capacity or deliverability assumptions. The Plan therefore continues to rely on an unrealistic understanding of what the site can accommodate.

Using reasonable buffer calculations and the Preliminary Ecology Assessment

Feature	Description	Irreplaceable	Must be retained	Length	Width	Buffer side 1	Buffer side 2	Hedge + Buffer
H1	S R Native with Trees	Y	Y	132	1.5	5		858
H2	S R Native with Trees & Residential Buffer		Y	300	1	30		9300
H5	Native & Agricultural Buffer		Y	126	1	30		3906
H6	Native & Agricultural Buffer (Cattle Breeding)		Y	400	1	50		20400
LWS	Local Wildlife Site (Ancient Woodland)	Y	Y	265	1	50		13515
T7	Oak		Y		0.72			8.64
T8	Oak		Y		0.76			9.12
Not on PEA	Oak	Poss	Y		0.81			9.72

Feature	Description	Irreplaceable	Must be retained	Length	Width	Buffer side 1	Buffer side 2	Hedge + Buffer
	Woodland Buffer		Y		20m radius	15		3850
	Dry Acid Grassland		Should		25m radius	15		5000
	Badger sett		Y			30		2800
							Total M sq.	59656.48
							Total Ha	**5.97**

General Employment	Ha
Site (Ha)	11.15
Net cap (Ha)	10.72
Council allowance for buffers?	0.43
Our estimate for buffers (HA)	5.97
Estimate available for development	5.18

- This is a substantial proportion of the total site area and significantly reduces the amount of land that could realistically be developed.

7. Implications for Capacity and Layout

- This is not simply a reduction in area, but a reduction in usable and functional space. The remaining land is irregular and constrained, limiting the ability to accommodate access, drainage and built development.
- The Main Modifications do not address this. They do not require any reassessment of capacity or layout feasibility and instead rely on these issues being resolved at a later stage. This is not appropriate for a site with this level of constraint.

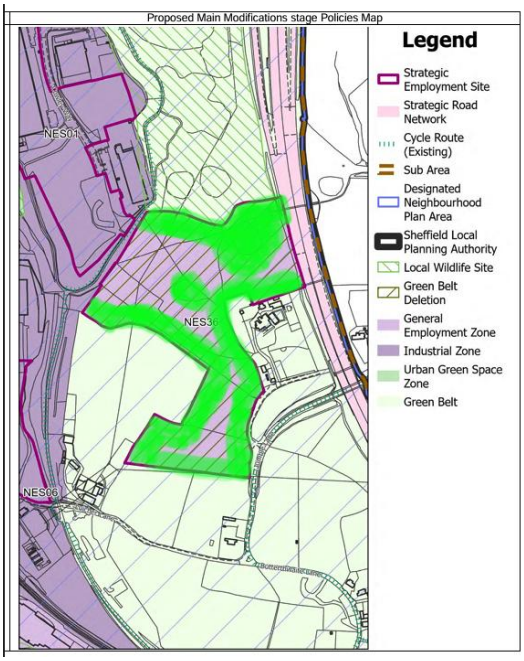


Illustration to show that the site is far more constrained than assumed in the plan.

- In practice:
  - buffers overlap and fragment the site.
  - the remaining land is broken into smaller, irregular parcels.
  - flexibility for layout, access and drainage is severely limited.

8. Failure of Site Selection Due Diligence and Changing Availability

- The Main Modifications do not address the failure of the original site selection process. The site was promoted on the basis that the full land area was available, which is now known not to be the case.
- As a result, the site that was assessed and compared against alternatives is not the site that is now being allocated. The Main Modifications do not require this to be revisited, nor do they require the site to be reassessed against alternatives in its current form.

9. Transport and Air Quality Impacts

Independent Transport Evidence

- An independently commissioned transport assessment has been undertaken by Ian Taylor (I.Eng MICE), an Incorporated Engineer and Member of the Institution of Civil Engineers with over 35 years' experience. The report identifies key risks, evidence gaps and requirements that must be addressed before the allocation can be considered sound (full report available).

Key Issues

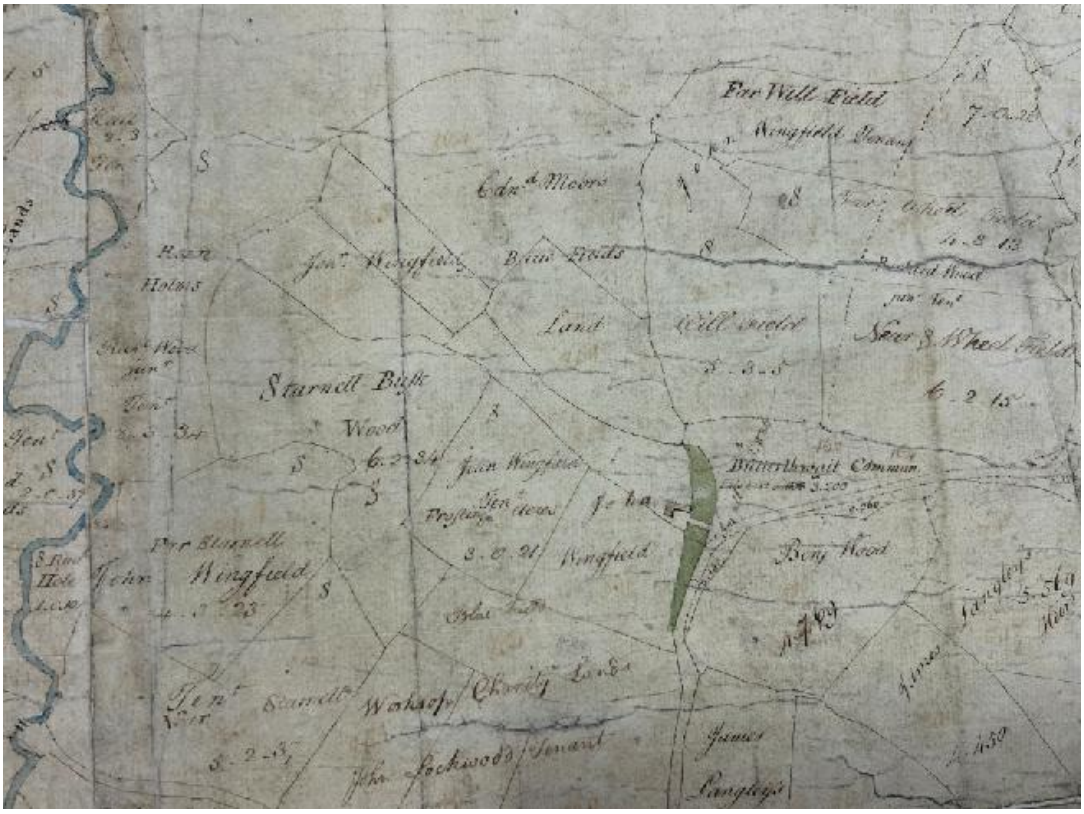
- The Main Modifications do not require reassessment of transport and air quality impacts. This is particularly significant given the recent approval of the HGV

refuelling hub, which will introduce a substantial increase in HGV movements using the same road network.

- The modifications to ES5 do not require cumulative assessment of impacts on ecological receptors, despite the clear link between air quality and biodiversity. In this location, where the site directly adjoins ancient woodland, this is a critical omission.
- There is no evidence that the cumulative impact of the motorway, the refuelling hub and the proposed allocation has been assessed. The Main Modifications do not address this.

10. Heritage, Historic Landscape and Potential Irreplaceable Hedgerows

- The Main Modifications do not address the failure to undertake an integrated assessment of heritage and ecology. Historic mapping demonstrates long-term continuity of field boundaries, including the distinctive “bottle” field pattern and the woodland boundary known as Starnell Wood, which can be traced back to the Harrison Survey of 1637.



Enclosure map from the 1780’s



OS Map from 1855

Spring survey evidence identifies species associated with undisturbed soils that were not recorded in the late summer ecological assessment. Taken together, this strongly suggests the presence of ancient hedgerows.

The Main Modifications to GS5 recognise the importance of irreplaceable habitats, but do not require this to be assessed or resolved at plan stage. Nor do they consider the implications if these features are confirmed. This represents a fundamental gap in the evidence.

11. Conclusion

The Main Modifications fail to resolve the issues affecting NES36. They do not respond to the material change in the site, do not require the evidence base to be updated, and do not demonstrate that the constraints identified can be addressed.

While the modified policies such as GS5, GS7 and BG1 elevate the importance of biodiversity, woodland protection and ecological networks, those standards are not applied to this site. Instead, the allocation continues to rely on outdated assumptions and the deferral of fundamental issues, most key being the isolation an irreplaceable habitat.

As a result, the allocation remains not justified, not effective and not consistent with national policy. The Main Modifications do not make the Plan sound in respect of this site, and NES36 should be removed from the allocation.

NES37 (Townend Farm) - MM351

1. Green Belt Harm / Spatial Strategy

- NES37 forms part of a critical area of Green Belt that prevents coalescence between Ecclesfield, Grenoside and Chapeltown. Its release would materially erode settlement separation and result in outward urban expansion rather than contained growth.
- The site cannot be considered in isolation. NES37 forms part of a wider cluster of allocations (NES38, NES39 and CH05) within a limited geographic area. Taken together, these sites represent a significant concentration of Green Belt release and a step-change in the settlement pattern that has not been assessed cumulatively.
- The Plan states that development will prioritise brownfield land and sustainable urban locations. The allocation of NES37 is inconsistent with this spatial strategy and demonstrates reliance on Green Belt release rather than maximising lower-impact alternatives.
- The IIA Addendum identifies that Greenfield/Green Belt sites perform less favourably in relation to land use, biodiversity and transport. Despite this, NES37 remains allocated without clear justification for rejecting preferable alternatives.
- The “exceptional circumstances” required to justify Green Belt release have not been robustly demonstrated.
- While the Main Modifications rely on the application of the “Golden Rules”, there is no clear evidence that these can be delivered in practice. The viability of increased affordable housing provision is uncertain, and compensatory improvements are not clearly defined, quantified or secured.
- The requirement for compensatory improvements to the remaining Green Belt is not supported by a clear delivery mechanism, location strategy or evidence of effectiveness. There is no assurance that such measures would offset the permanent loss of this strategically important Green Belt land.
- The justification for Green Belt release is based on assumed housing capacity. Where that capacity is uncertain, constrained or dependent on unresolved factors, it cannot be relied upon to demonstrate exceptional circumstances. If the site cannot credibly deliver its anticipated capacity, its release from the Green Belt is not justified.
- The site comprises high-quality agricultural land. DEFRA’s Predictive Agricultural Land Classification mapping indicates that a significant proportion of NES37 is likely to be Grade 2 Best and Most Versatile (BMV) land. National planning policy requires that such land is protected, and its loss should be avoided where possible.
- The Main Modifications remove the requirement for site-specific agricultural land assessment prior to development, effectively accepting the loss of BMV land in principle without clear justification. This further undermines the robustness of the allocation.
- The loss of productive farmland also raises wider concerns regarding food security and sustainable land use. This is reflected in national policy direction

and public statements, including comments made by the Prime Minister in Parliament on 7 January 2026 where he stated that “we will not be ploughing up farmland” indicating that development should avoid unnecessary loss of farmland. In this context, the release of NES37 is inconsistent with those objectives.

2. Landscape, Character and Visual Impacts (IIA SA8 / SA9)

- The site is currently in active agricultural use and contributes to the open rural character of the area. Development would result in permanent loss of openness and a fundamental change in landscape character.
- Public rights of way cross the site and provide access to open countryside. These contribute to local amenity and would be materially affected.
- While the Main Modifications require retention of these routes, there is no evidence that their function, safety or amenity value can be preserved within a significantly intensified development.
- The scale and density proposed would introduce development out of character with the surrounding area, particularly when considered cumulatively with nearby allocations.
- The IIA identifies adverse impacts in relation to landscape and land use which have not been adequately mitigated or justified.

3. Transport, Highways and Access Constraints

Independent Transport Evidence

- An independently commissioned transport assessment has been undertaken by Ian Taylor (I.Eng MICE), an Incorporated Engineer and Member of the Institution of Civil Engineers with over 35 years’ experience. The report identifies key risks, evidence gaps and requirements that must be addressed before the allocation can be considered sound (full report available).

Key Findings

- No robust evidence has been provided to demonstrate that safe and workable access arrangements can be delivered.
- The Main Modifications identify Creswick Lane as the primary access, with potential additional access via Yew Lane and The Wheel. However, none of these access points have been shown to be safe, suitable or deliverable.
- In particular, access via Yew Lane would directly impact the Local Wildlife Site, and no evidence has been provided to demonstrate that such impacts can be avoided or adequately mitigated.

- The surrounding highway network is already heavily constrained, with narrow carriageways, limited visibility and physical restrictions that limit the scope for improvement.
- Existing congestion is severe and well-established, particularly at peak times and during school-related traffic flows. The proposed development would significantly exacerbate these conditions.
- The cumulative impact of NES37 alongside NES38, NES39 and CH05 has not been assessed, despite a clear requirement to coordinate infrastructure delivery.
- The site performs poorly in terms of sustainable transport and is likely to result in high levels of car dependency.
- Requirements for Active Travel England compliance and LTN 1/20 infrastructure are unlikely to be achievable due to topography and constrained highway widths.
- Traffic modelling assumptions are unreliable and likely to underestimate real-world impacts.
- A significant evidence gap exists, with no robust trip generation data, cumulative modelling or defined mitigation strategy.

Conclusion on Transport

- The acceptability of NES37 depends on demonstrating safe access, mitigated impacts and deliverable sustainable transport in line with the Plan's "Golden Rules". These requirements have not been met.
- The site is likely to be inherently car-dependent and incapable of meeting national policy expectations.
- In the absence of robust, deliverable and evidenced mitigation, the allocation should be reconsidered.

4. Flood Risk and Drainage Issues

- The site contributes to a wider drainage network feeding into areas of known flood risk, including downstream locations such as Ecclesfield.
- There is evidence of existing surface water and drainage constraints which would be exacerbated by development.
- No cumulative flood risk assessment has been undertaken across the cluster of sites.
- The Plan relies on mitigation at planning application stage, rather than demonstrating deliverability at allocation stage.
- The Main Modifications require safeguarding of land for a burial ground. However, the Level 2 SFRA identifies areas of groundwater emergence across parts of the site, particularly within the central band.
- There is no evidence that the suitability of this land for burial use has been assessed in light of these conditions.

- Burial uses are highly sensitive to groundwater and drainage conditions. In the absence of evidence demonstrating suitability, there is a significant risk that this land use cannot be delivered as proposed.
- In addition, the Council has identified an urgent need for burial provision. However, NES37 is not expected to be available until 2033/34 and therefore cannot meet this requirement within the necessary timeframe.
- Evidence in EXAM 137 confirms that alternative burial sites are being considered and progressed both within and outside the Local Plan. This demonstrates that burial provision is not dependent on NES37 and that reasonable alternatives exist.
- If the burial use cannot be accommodated or delivered in the required timeframe, this has implications for site layout, capacity and viability which have not been assessed.

5. Heritage and Archaeological Considerations

- The site lies within an area of historic landscape character and known archaeological interest.
- Previous assessments identify the potential for archaeological remains, and development risks harm to the historic landscape and nearby heritage assets.
- Evidence from local investigations has identified artefacts of potential historical significance within the site. Photographic evidence of these findings is available and further supports the need for comprehensive archaeological assessment.
- The Plan relies on mitigation through master planning, but there is no evidence that impacts can be avoided or adequately mitigated.

6. Ecological and Biodiversity Concerns

- The site contains habitats of medium to high ecological value and supports protected and priority species.
- The Local Wildlife Site would be directly affected by access proposals.
- The Main Modifications require that harm be minimised and fully compensated. However, there is no evidence that equivalent habitat can be recreated.
- Biodiversity Net Gain does not compensate for the loss of Green Belt function or ecological connectivity.
- Further surveys are deferred to later stages, creating uncertainty at plan-making stage.
- See below map plotting trees on this site together with protected borders.

7. Mining and Ground Conditions

- No evidence has been provided to demonstrate that ground conditions can be addressed without affecting viability or deliverability.
- Further investigation is deferred, introducing uncertainty.

8. Local Infrastructure Capacity

- Existing services, including healthcare provision, are already under pressure. The Plan does not demonstrate how additional demand will be met.
- The requirement to safeguard 7 hectares for education and 4 hectares for burial use is not supported by clear evidence of need, funding or delivery.
- These requirements raise further concerns as to whether the site can accommodate all proposed uses alongside housing.

9. Deliverability and Phasing Uncertainty

- The site is subject to a secure tenancy under the Agricultural Holdings Act 1986, significantly constraining availability.
- The site cannot be considered deliverable within the plan period.
- There is an unresolved dispute regarding site availability between the Council and the current tenants, supported by conflicting legal opinions. This is a complex and potentially protracted matter which may take many years to resolve.
- In these circumstances, the site cannot be considered “available” within the meaning of national policy.
- The continued inclusion of NES37, when alternative sites have been assessed, raises significant concerns regarding the consistency and robustness of the site selection process.
- The housing capacity calculation departs from established HELAA methodology, undermining its robustness.
- The capacity assumptions for NES37 are not robust. The Main Modifications (MM351) identify a gross site area of 29.80 hectares, of which 11 hectares must be safeguarded for education and burial uses, leaving a significantly reduced area available for housing.
- The Council’s application of a 90% net developable ratio to the remaining housing land is inconsistent with HELAA methodology and does not reflect the scale of constraints affecting the site.
- The allocation is subject to substantial site-wide constraints, including flood mitigation requirements, ecological buffers, retained landscape features and infrastructure provision, all of which reduce the land available for development.

- Mandatory policy requirements, including on-site open space provision (Policy NC15), must also be accommodated within the housing parcel, further limiting developable land.
- These constraints, combined with the need to accommodate access infrastructure and respond to site-specific conditions, significantly reduce the realistic net developable area.
- As a result, the stated capacity of 592 dwellings cannot be relied upon. A separate detailed technical assessment submitted by the Sheffield Green Belt Alliance demonstrates that the achievable capacity is significantly lower, within a range of approximately 350–410 dwellings, depending on density assumptions.
- If the site cannot credibly deliver its stated capacity, then the scale of Green Belt release required to support it cannot be justified.
- The site cannot accommodate both housing and required non-housing uses within standard assumptions.
- The requirement to coordinate with NES39 reinforces the need for a cumulative assessment, which has not been provided.
- The reliance on future master planning to resolve fundamental constraints undermines the ability to conclude that the allocation is justified or effective.
- The stepped trajectory does not resolve these issues.
- The reliance on NES37 to deliver burial provision is further undermined by uncertainty in the evidence base and the existence of alternative sites. The allocation therefore fails to demonstrate that it is either necessary or effective.
- The absence of clear and consistent reasoning as to why NES37 has been selected over alternative sites further undermines confidence in the robustness and transparency of the Plan's evidence base.

10. Conclusion

NES37 presents significant and unresolved issues across Green Belt policy, transport, flood risk, ecology, infrastructure and deliverability.

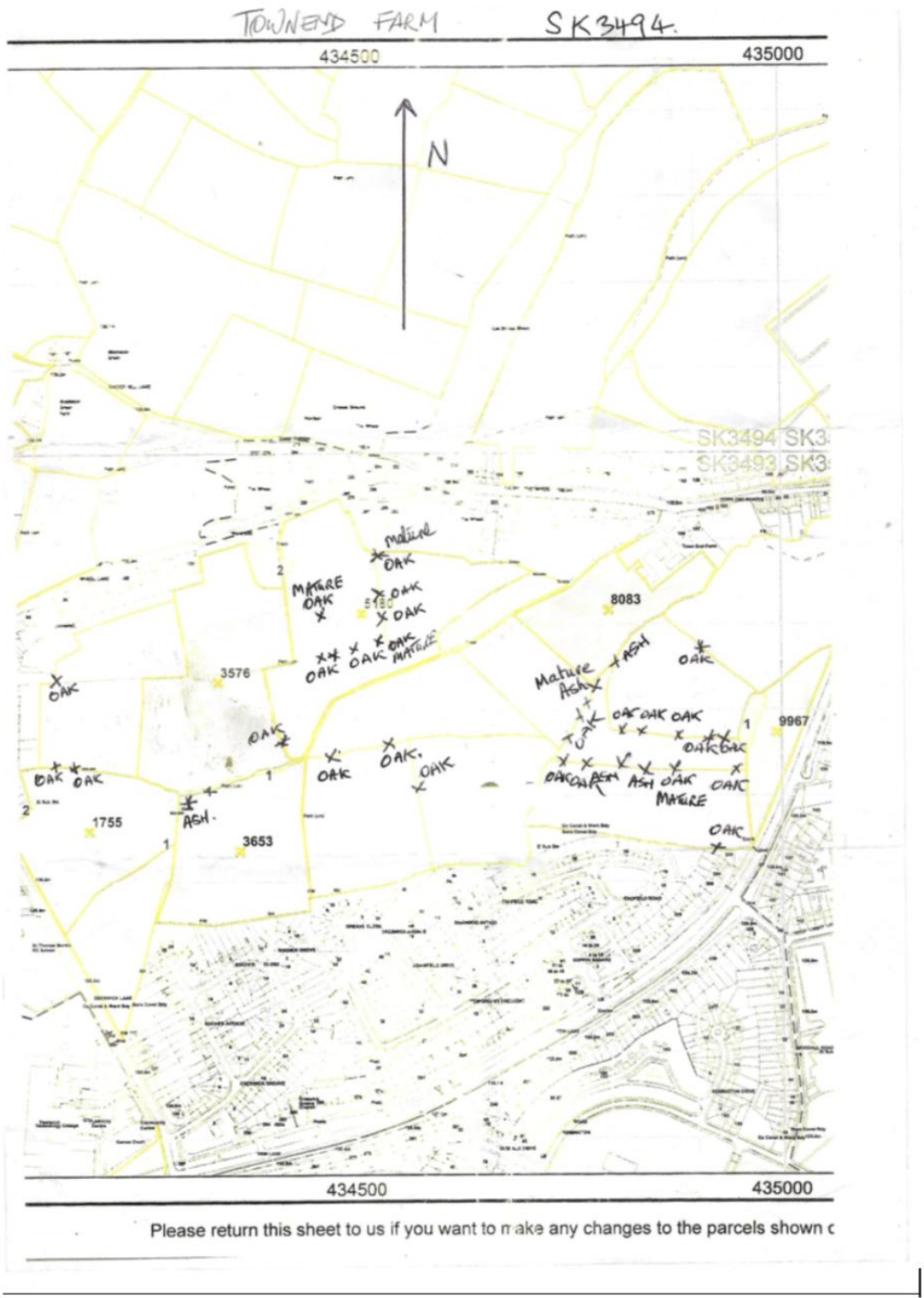
The evidence demonstrates that:

- The site causes substantial harm to Green Belt purposes.
- The allocation is not supported by a robust or consistent evidence base.
- The site is not available or deliverable within the plan period.
- The requirements set out in the Main Modifications cannot be demonstrated as achievable.
- Key impacts, particularly cumulative impacts, have not been assessed.
- The stated housing capacity is not credible and is significantly overstated, meaning the scale of Green Belt release required to support the allocation cannot be justified.

NES37 therefore fails the tests of soundness.

We request that the site is removed from the Sheffield Local Plan.

Map of Townend Farm showing examples of very old trees to be preserved with space around.



Minimum Potential Loss of Land Area

Using minimum buffer calculations														
Feature	Description	Irreplaceable	Must be retai	Length	Width	Buffer side 1	Buffer side 2	Hedge + Buffer						
H1	Non-native ornamental			82	2	2		328						
H2	Non-native ornamental			19	5	2		133						
H3	Native with Trees			40	3	2		200						
H4	S R Native with Trees		Y	135	5	5	5	2025						
H5	Native			92	2	2	2	552						
H6	S R Native with Trees		Y	49	4	5		441						
H7a	S R Native		Y	62	6	5	5	992						
H7b	S R Native		Y	84	6	5		924						
H8	Non-native ornamental			127	3	2		635						
H9	Native			78	3	2	2	546						
H10	Non-native ornamental			41	1	2		123						
H11	Non-native ornamental			21	1	1		42						
H12	S R Native with Trees		Y	210	6	5	5	3360						
H13	Native with Trees			118	2	2		472						
H14	S R Native		Y	168	2	5		1176						
H15	Native			86	4	2	2	688						
H16	S R Native with Trees		Y	99	2	5	5	1188						
H17	S R Native with Trees		Y	171	4	5		1539						
H18	S R Native with Trees		Y	54	8	5		702						
H19	Native			287	2	2	2	1722						
H20	Native			113	2	2	2	678						
H21	Native			33	2	2	2	198						
H22	Native			106	2	2	2	636						
H23	S R Native with Trees		Y	141	3	5		1128						
H24	S R Native with Trees		Y	112	4	5		1008						
H25	S R Native with Trees		Y	120	4	5		1080						
H26	S R Native with Trees		Y	224	3	5	5	2912						
H27	S R Native		Y	56	1.5	5	5	644						
H28	S R Native		Y	24	5	6		264						
H29	S R Native		Y	127	3	6		1143						
H30	S R Native with Trees		Y	67	0			0						
H31	S R Native		Y	30	0			0		ancient/Veteran tree buffer = 15m radius				
L1	Valuable line of trees	Y	Y	48	1	15	15	1488		Non ancient/Veteran Tree buffers = radius of 12 x stem width				
T2	small							14.66		Average stem buffer area				
T3	medium							72.4	Small tree	18	14.66			
T4	large							254.5	Medium Tree	40	72.4			
T5	medium							72.4	Large	75	254.5			
T6	medium							72.4	V Large		706.86			
T7	medium							72.4						
T8	medium							72.4						
T9	large							254.5						
T10	large							254.5						
T11	ancient/Veteran	Y	Y					706.86						
T12	large							254.5						
T13	ancient/Veteran	Y	Y					706.86						
T14	ancient/Veteran	Y	Y					706.86						
T15	ancient/Veteran	Y	Y					706.86						
T16	ancient/Veteran	Y	Y					706.86						
T17	ancient/Veteran	Y	Y					706.86						
T18	ancient/Veteran	Y	Y					706.86						
T19	large							254.5						
T20	ancient/Veteran	Y	Y					706.86						
T21	large							254.5						
T22	large							254.5						
T23	large							254.5						
T24	large							254.5						
T25	ancient/Veteran	Y	Y					706.86						
T26	ancient/Veteran	Y	Y					706.86						
T27	ancient/Veteran	Y	Y					706.86						
T28	ancient/Veteran	Y	Y					706.86						
T29	ancient/Veteran	Y	Y					706.86						
T30	ancient/Veteran	Y	Y					706.86						
T31	ancient/Veteran	Y	Y					706.86						
T32	ancient/Veteran	Y	Y					706.86						
T33	medium							72.4						
T34	medium							72.4						
T35	medium							72.4						
T36	medium							72.4						
T37	medium							72.4						
T38	large							254.5						
	Land use Buffer Farm-Houses							6652	At least 30m is normal between houses and a working farm					
	Woodland Buffer - East							2350						
	Woodland Buffer - Central							10572						
	Woodland Buffer - Aspen	Y	Y					8030	At least 15m - this is possibly ancient and therefore would require air, noise and lig					
							Total M sq	71164.42						
							Total Ha	7.116442						

Maximum Potential Loss of Land Area

Using buffers which take air, noise and light pollution into ac count														
Feature	Description	Irreplaceable	Must be retai	Length	Width	Buffer side 1	Buffer side 2	Hedge + Buffer						
H1	Non-native ornamental			82	2	2		328						
H2	Non-native ornamental			19	5	2		133						
H3	Native with Trees			40	3	2		200						
H4	S R Native with Trees		Y	135	5	30	30	8775						
H5	Native			92	2	2	2	552						
H6	S R Native with Trees		Y	49	4	30		1666						
H7a	S R Native		Y	62	6	30	30	4092						
H7b	S R Native		Y	84	6	30		3024						
H8	Non-native ornamental			127	3	2		635						
H9	Native			78	3	2	2	546						
H10	Non-native ornamental			41	1	2		123						
H11	Non-native ornamental			21	1	1		42						
H12	S R Native with Trees		Y	210	6	30	30	13860						
H13	Native with Trees			118	2	2		472						
H14	S R Native		Y	168	2	30		5376						
H15	Native			86	4	2	2	688						
H16	S R Native with Trees		Y	99	2	30	30	6138						
H17	S R Native with Trees		Y	171	4	30		5814						
H18	S R Native with Trees		Y	54	8	30		2052						
H19	Native			287	2	2	2	1722						
H20	Native			113	2	2	2	678						
H21	Native			33	2	2	2	198						
H22	Native			106	2	2	2	636						
H23	S R Native with Trees		Y	141	3	30		4653						
H24	S R Native with Trees		Y	112	4	30		3808						
H25	S R Native with Trees		Y	120	4	30		4080						
H26	S R Native with Trees		Y	224	3	30	30	14112						
H27	S R Native		Y	56	1.5	30	30	3444						
H28	S R Native		Y	24	5	30		840						
H29	S R Native		Y	127	3	30		4191						
H30	S R Native with Trees		Y	67	0			0						
H31	S R Native		Y	30	0			0		ancient/Veteran tree buffer = 15m radius				
L1	Valuable line	Y	Y	48	1	30	30	2928		Non ancient/Veteran Tree buffers = radius of 12x stem width				
T2	small							14.66		Average stem	buffer area			
T3	medium							72.4	Small tree	18	14.66			
T4	large							254.5	Medium Tree	40	72.4			
T5	medium							72.4	Large	75	254.5			
T6	medium							72.4	V Large		2827			
T7	medium							72.4						
T8	medium							72.4						
T9	large							254.5						
T10	large							254.5						
T11	ancient/Vete	Y	Y					2827						
T12	large							254.5						
T13	ancient/Vete	Y	Y					2827						
T14	ancient/Vete	Y	Y					2827						
T15	ancient/Vete	Y	Y					2827						
T16	ancient/Vete	Y	Y					2827						
T17	ancient/Vete	Y	Y					2827						
T18	ancient/Vete	Y	Y					2827						
T19	large							254.5						
T20	ancient/Vete	Y	Y					2827						
T21	large							254.5						
T22	large							254.5						
T23	large							254.5						
T24	large							254.5						
T25	ancient/Vete	Y	Y					2827						
T26	ancient/Vete	Y	Y					2827						
T27	ancient/Vete	Y	Y					2827						
T28	ancient/Vete	Y	Y					2827						
T29	ancient/Vete	Y	Y					2827						
T30	ancient/Vete	Y	Y					2827						
T31	ancient/Vete	Y	Y					2827						
T32	ancient/Vete	Y	Y					2827						
T33	medium							72.4						
T34	medium							72.4						
T35	medium							72.4						
T36	medium							72.4						
T37	medium							72.4						
T38	large							254.5						
	Landuse Buffer Farm-Houses							9200	At least 50m is normal between houses and a working farm					
	Woodland Buffer - East							2350						
	Woodland Buffer - Central							10572						
	Woodland Bu	Y	Y					14600	At least 30m - this is possibly ancient and therefore would require air, noise and lig					
							Total M sq	18 1043.66						
							Total Ha	18..104366						

Map of Townend Farm showing areas to be preserved.

b) Development will not be permitted that would directly or indirectly damage existing mature or ancient woodland, ancient trees, veteran trees, or ancient or species-rich hedgerows, other than in wholly exceptional circumstances and where a suitable compensation strategy exists.



NES38 (Holme Lane Far.) - MM352

1. Green Belt Harm / Spatial Strategy

- NES38 forms part of a cluster of Green Belt allocations, including NES36, NES37, NES39, CH03, CH04, and CH05. Collectively, these sites constitute a significant outward expansion of the settlement boundary, effectively merging Grenoside with Fox Hill.
- The Plan treats each site individually, but the true impact is cumulative: strategic urban extension rather than contained growth.
- Loss of continuous Green Belt and erosion of local identity and separation of communities.
- Over-reliance on Green Belt release despite available brownfield alternatives undermines the justification for exceptional circumstances.
- Sequential Approach: The Council has not demonstrated that all reasonable alternatives have been fully explored. Evidence indicates previously developed sites within the urban area remain underutilised, and higher-density development in sustainable locations have not been maximised. This calls into question the Plan's consistency with national policy and the sequential test (NPPF para 149).
- Predictive Agricultural Land Classification (ALC) mapping indicates that NES38 comprises Grade 2 and Grade 3a land, which is classified as Best and Most Versatile (BMV) agricultural land.
- Across the proposed Green Belt release sites, at least **1**21.64 hectares (approximately 53%) are identified as BMV land.
- National policy requires that BMV land should be protected where possible, and its loss should be justified through a robust assessment of alternatives.
- The allocation of NES38 therefore contributes not only to Green Belt harm but also to the loss of high-quality agricultural land, further undermining the justification for release.

2. Landscape, Character and Visual Impacts (IIA SA8 / SA9)

- NES38 is currently active grazing and equine land, supporting livelihoods linked to local equine activity and Traveller communities. Development would:
    - Replace open rural character with housing, eroding landscape separation.
    - Be visually prominent due to elevated topography, especially from Halifax Road.
    - Conflict with NPPF para 191 regarding visual amenity and landscape character
- While not formally leased to Traveller groups, the site supports equine activity associated with Gypsy and Traveller communities.
- Displacement engages the Public Sector Equality Duty (Equality Act 2010, Sections 9 & 149).
- The Council has not demonstrated that these indirect effects have been considered, nor that alternative provision has been explored.
- This lack of evidence undermines Plan soundness in terms of equalities and policy consistency.

3. Local Wildlife Site

- NES38 contains a designated Local Wildlife Site. Inspector guidance is clear:
- No development should take place within the LWS, and appropriate buffers must be applied.
- MM352 introduces ambiguity around connectivity; EXAM 190 suggests routes through the LWS; earlier wording references “infrastructure,” potentially including roads.
- The Main Modifications simultaneously claim to protect the LWS while enabling interventions within it, directly contradicting NPPF para 180 and the mitigation hierarchy (avoid → mitigate → compensate). This introduces fundamental inconsistency and renders the allocation unsound.

4. Transport, Highways, Access, and Cumulative Infrastructure

Independent Transport Evidence

- An independently commissioned transport assessment has been undertaken by Ian Taylor (I.Eng MICE), an Incorporated Engineer and Member of the Institution of Civil Engineers with over 35 years’ experience. The report identifies key risks, evidence gaps and requirements that must be addressed before the allocation can be considered sound (full report available).

Key Points:

- Salt Box Lane is narrow, constrained, and affected by on-street parking; access geometry is restricted by veteran trees.
- The site is 200m from the A61, carrying ~19,000 vehicles/day, raising noise and air quality concerns.
- Estimated trip generation: ~1,100–1,500 daily vehicle movements, 90–150 peak hour trips.
- Real-world access constraints:
    - Daily overspill parking associated with the nearby hospital appears to affect road conditions both above and below the proposed access point.
    - A visibility splay that only functions when roads are clear cannot be considered robust in normal operating conditions.
    - This raises doubt as to whether safe and policy-compliant access can be achieved without additional land-take, redesign, or compromise.
- Cumulative infrastructure pressure: The cluster of surrounding allocations (NES36, NES37, NES39) adds:
    - Local road congestion
    - Additional demand on healthcare (GP surgeries)
    - Pressure on schools
    - Surface water and downstream drainage systems
    - Emergency and service access constraints

- Climate impacts:
    - Likely high car dependency, conflicting with decarbonisation and modal shift objectives.
    - Loss of open land, mature vegetation, and green infrastructure reduces carbon sequestration and climate resilience.
- These factors raise serious doubts about the site's deliverability and sustainability, contrary to NPPF para 111.

5. Ecological Constraints and Veteran Trees

- NES38 contains 50+ veteran trees requiring substantial buffers, in addition to LWS protection.
- NPPF para 186(c) recognises veteran trees as irreplaceable habitats; loss or deterioration should be refused unless wholly exceptional circumstances exist.
- The Council has not demonstrated:
    - Accurate Root Protection Areas (RPAs)
    - Impacts of access, services, or level changes on veteran trees
    - Feasible long-term protection and stand-off distances
- Ecology beyond the LWS:
    - Ecological value is likely to extend beyond the mapped LWS boundary.
    - Potential bat and badger commuting routes, bird use, habitat connectivity and seasonal survey limitations may require additional buffers, corridors or layout restrictions.
    - These factors may not yet be fully reflected in the published net developable area.
- Conclusion: Cumulative ecological constraints strongly undermine the claimed net developable area of 5.38 ha.

Appendix A – Observed Flora and Habitat Features on NES38

Appendix B – Wildlife Observed on or Adjacent to NES38

6. Site Capacity and Deliverability

- The issue is not whether individual constraints make the site undevelopable in isolation, but whether their cumulative impact has been properly reflected in the stated net developable area and capacity. At present, this has not been robustly demonstrated.
- The Council's stated capacity of 188 dwellings:
    - Fails to account for veteran tree buffers, LWS protection, SuDS land-take, internal access roads, and topographical constraints.
    - Overestimates developable area and introduces significant uncertainty into the housing trajectory.

    - Relies on unproven mitigation and future technical solutions rather than demonstrated evidence.

- Cumulative impact on layout efficiency:
    - Constraints do not simply remove land in isolation; they fragment the site and reduce layout efficiency.
    - Tree buffers, drainage features, access geometry and ecological corridors can create irregular residual land parcels that are less suitable for development.

- Indicative developable area:

- The published net developable area of 5.38 hectares does not appear to reflect the full cumulative impact of constraints.
- When allowing for LWS buffers, veteran tree Root Protection Areas, drainage/SuDS land-take, access requirements, and reduced layout efficiency, a more realistic developable area is likely to fall in the region of approximately **3.3 to 3.8 hectares** once cumulative constraints are properly accounted for.
- This represents a potential reduction of around 30–40% from the stated figure.

- Implication for capacity:
    - At typical suburban densities (30–35 dwellings per hectare), this would suggest a capacity in the region of approximately **100–130 dwellings**, significantly below the stated 188.
    - Alternatively, achieving 188 dwellings would require substantially higher densities that may not be compatible with site constraints, character, or policy expectations.

- Other constraints: topography, heritage features, and potential archaeological interest further reduce feasible buildable area.

7. Flood Risk and Drainage

- Site functions as part of a natural water management system.
- Proposed SuDS infrastructure is uphill of existing homes, raising potential downstream risk.
- No Level 2 SFRA or site-specific drainage modelling has been provided.

- Drainage land-take uncertainty:
    - The extent of land required for attenuation, infiltration, exceedance routing and maintenance access has not been demonstrated.
    - Without this information, the net developable area cannot be considered robust.

8. Heritage and Archaeology

- Historic field patterns, hedgerows, and long-standing agricultural use may have heritage value.
- No detailed heritage or archaeological assessment has been undertaken, introducing further uncertainty.

9. Climate and Sustainability Impacts

- Loss of mature vegetation, open land, and green infrastructure reduces climate resilience.
- Development increases transport emissions and conflicts with the Plan's decarbonisation and climate-responsive planning objectives.

10. Mining and Ground Contamination / Stability Risks

- EXAM 188 confirms that NES38 is not affected by historic mining activity and does not require a Coal Mining Risk Assessment.
- This highlights a clear contrast with other allocated sites which are subject to significant mining constraints requiring investigation and remediation. The Plan does not explain how this has been taken into account in the site selection process, this raises questions as to whether site constraints have been consistently assessed across allocations.

11. Conclusion

- NES38 presents a combination of interacting constraints that are:
    - Unresolved and unaccounted for in capacity assumptions
    - Likely to significantly reduce developable area.
    - Dependent on unproven mitigation or technical solutions
- The allocation is therefore not justified, not effective, and not consistent with national policy.
- **Request: Remove Site NES38 entirely from the Plan due to lack of robust deliverability and unsound assumptions.**

Appendices

Appendix A – Observed Flora and Habitat Features

- **Field Entrance** (adjacent to Scout Hut): Ash, Oak, Beech, Sycamore, Hawthorn, Holly, Elder, Willow, Horse Chestnut, Laburnum; Ground flora: Cow Parsley, Clovers, Bluebells, Buttercups, Blackberry
- **Rear of Holme Lane Farm**: Orchard Grass, Red Fescue, Greater Tussock Sedge, Sorrel, Common Yarrow, Cow Parsley, Lamb's Tongue, Field Mustard, Creeping Thistle, Dead Thistle, Rutabaga Local Wildlife Site (Cowper Avenue Greenspace – protected): Ash, Buttercup, Wood Avens, Bluebells, Spanish Bluebells, Square-stalked Willowherb, Fringe Willowherb
- **Fields bordering Salt Box Lane and Fox Hill Road**: Oak (including veteran), mature willow copse, Hawthorn; Ground flora: Hart's-tongue fern, Common Plantain, Bitter Dock

Appendix B – Wildlife Observed on or Adjacent to NES38

Long-tailed Tit, Eurasian Curlew, Eurasian Blackcap, Eurasian Wren, Eurasian Robin, Eurasian Blue Tit, Eurasian Blackbird, Eurasian Greenfinch, Stock Dove, Owl (species unconfirmed), Common Chiffchaff, Common Chaffinch, European Goldfinch, Willow Warbler, Pheasant, Badger, Fox.

NES39 (Wheel Lane/ Middleton Lane) - MM353

Main Modification reduces the site to 2.10 hectares (66 dwellings). However, it does not resolve site-specific suitability concerns.

1. Green Belt Harm / Spatial Strategy

- The site is currently designated as Green Belt and contributes to:
  - openness of the area
  - separation between Grenoside and Ecclesfield
  - prevention of settlement coalescence
- The Main Modification confirms release of this land but does not provide:
  - clear evidence of exceptional circumstances
  - justification for why this site is required over alternatives.
- The allocation relies on the “Golden Rules”, including:
  - higher affordable housing
  - compensatory improvements
- However, the Statement of Common Ground confirms disagreement between SCC and the developer on compensatory improvements.
- There is no clear explanation of what improvements will be delivered and whether they are viable or enforceable.
- The role of the site in fulfilling Green Belt purposes remains significant and unresolved.
- Middleton Lane presents a clear defendable boundary between the allocation and housing development further down in the valley, to the north westerly edge of the site.
- This contrasts with the proposed boundary of the heritage hedge to the roughly east of the site, downhill, which itself is noteworthy of protection. The hedge would afford little as a defensive line in meeting the Green Belt considered sensitive and removed from the Plan.
- The reduction of allocation NES39 has been a welcome recognition of its importance. However, the justification for removing the Green Belt below the allocated site, for reasons of openness, attractiveness and topography could equally apply to this last parcel of land. The site is visually prominent and contributes significantly to landscape character.

2. Landscape, Character and Visual Impacts (IIA SA8 / SA9)

- Current land use is pastureland (fields bounded by hedgerows
- The site does however contain high-quality agricultural land. DEFRA’s Predictive Agricultural Land Classification mapping indicates that a significant proportion of NES39 is likely to be Grade 2 Best and Most Versatile (BMV) land. National planning policy requires that such land is protected, and its loss should be avoided where possible.
- The Main Modifications remove the requirement for site-specific agricultural land assessment prior to development, effectively accepting the loss of BMV land in principle without clear justification. This further undermines the robustness of the allocation.

- The loss of productive farmland also raises wider concerns regarding food security and sustainable land use. This is reflected in national policy direction and public statements, including comments made by the Prime Minister in Parliament on 7 January 2026 where he stated that “we will not be ploughing up farmland” indicating that development should avoid unnecessary loss of farmland. In this context, the release of NES37 is inconsistent with those objectives:
    - Site characteristics:
    - visually prominent rising land
    - forms part of a valley slope
    - visible from surrounding roads and wider viewpoints
- The site contributes to:
    - rural character
    - open countryside setting
    - visual transition between settlements
- Development would introduce built form into currently open landscape, reduce openness and harm visual amenity.
- No updated landscape assessment has been provided to demonstrate that impacts can be mitigated.
- No new evidence is provided to demonstrate that the site is suitable in landscape terms, is free from environmental constraints or capable of accommodating development without unacceptable harm.
- The Green Belt Review notes that development must be ‘carefully designed’. In overlooking the valley, arguably any development would result in a significant visual impact from every direction. Road access position onto Wheel Lane is also clearly marked and would necessitate the partial removal of a heritage wall.



3.Transport, Highways and Access Constraints Independent Transport Evidence

- An independently commissioned transport assessment has been undertaken by Ian Taylor (I.Eng MICE), an Incorporated Engineer and Member of the Institution of Civil Engineers with over 35 years' experience. The report identifies key risks, evidence gaps and requirements that must be addressed before the allocation can be considered sound (full report available).

Key Points

- Although Wheel Lane appears to be a wide and generous road adjoining NES39, this is deceiving as its features, originating from a country lane, remain.
- Uphill it joins the very busy A61 where queues of standing traffic build daily up to the traffic lights, often down as far as Creswick Lane itself and below where the exit road is planned. The road is used as a short-cut to the motorway from over the valley in Oughtibridge and has increased with building development towards Deepcar and Stocksbridge.
- Downhill into Ecclesfield the road twists and narrows considerably several times between cottages, concealing exits and entrances, and at one point becomes a single lane passage with absence of and unusable pavement in different places. It cannot be widened without demolition of homes. An SCC EWR report of 2019 concluded with the identification of Wheel Lane as a restricted HGV route due to its narrow nature. It noted compounding issues with parking, restricted parking bays, pavement concerns and damage to walls and vehicles as they navigate to pass. The report also recognised similar difficulties relating to adjoining roads, including Yew Lane.
- As Wheel Lane becomes Town End Road, joining Ecclesfield village near the church, the road meets collectively with three other junctions: Stocks Hill leading to Yew Lane, Priory Road and St Mary's Lane. All are within close succession, all equally tight and highly congested at peak times with standing traffic. The whole area from that point down narrow Mill Road to the crossroads at Ecclesfield Common and leading to the motorway can crawl and is often at standstill.
- Creswick Lane – a third exit can also be difficult route to navigate and highly congested at the start and end of school day as it fronts two schools and joins the end of Yew Lane as it leads towards another highly congested area.
- Development of site NES39 appear in conflict with the spatial strategy of the Sheffield Plan; housing out on a limb, away from easily accessible and varying transport routes, at a distance from hubs of employment and with key local shops out of easy reach. NES39 is in an area heavily reliant on car use. The soundness of this site as one suitable for affordable/social housing in the light of this policy should be questioned as to its viability.
- Main Modifications reaffirms close coordination with the development of NES37 regarding the 'delivery of infrastructure where appropriate'. However, it is unclear how this relates to the new timescale for delivery of NES37 which has been delayed until 2033/4 and the consequences for delivery of site NES39.
- Infrastructure plans, assessment of feasibility and costings that would be required as part of a viability assessment have not been done.
- Traffic assessments, (outside school holiday periods), levels of road congestion, impact on pollution levels (when no baseline has been taken), or wider assessment and projections of cumulative impacts of transport and pollution

resulting from proposed site development across the locality of S35, has not been undertaken.

4. Flood Risk and Drainage Issues

- The site is identified as being within Flood Zone 1. However, the drainage strategy is to be determined at planning stage, and mitigation measures are not yet defined.
- The Main Modification requires compliance with the Level 2 SFRA, but no detailed site-specific drainage solution is provided.
- Flood risk may be low in policy terms, but drainage and runoff impacts are not evidenced.
- What needs to be completed:
    - Any known local flooding issues
    - Surface water problems in surrounding roads or properties
- Green Belt land below the designated site often floods in winter months making the public path and stepping stones over the stream to Cinder Hill Lane, effectively unpassable in winter months.
- The land surrounding becomes swampy and the runoff of rainwater from Cinder Hill into the stream from the other direction has been so forceful as to have washed away the steps.
- Sheffield and Rotherham Wildlife Trust noted their strong concerns in the October consultations, that increased flood risk posed from building up stream would have on wildlife in the area.

5. Heritage and Setting of Listed Buildings / Archaeological Assets

- The site is identified as containing archaeological interest and contributing to the setting of nearby heritage assets.
- The Main Modification requires further assessment and mitigation measures. However no detailed assessment is provided at allocation stage.
- Impacts on heritage are not fully understood or evidenced.
- Recognition of all site-specific heritage assets incomplete - consequently calculations for available, developable land may be wrong.
- What needs to be completed:
    - Identification of nearby listed buildings
    - Known heritage features including site-specific assessment.
    - Local historical context
- A known heritage wall fronts site NES39 onto Wheel Lane. However, another heritage wall cuts through the whole of site NES39 in the direction of the LWS from Wheel Lane, following the curves and lay of the land as it rises and falls across the site.
- Evidence of an earlier adjoining wall is apparent on the sloping land above the hedgerow on Middleton Lane.
- The walls are abundant with undergrowth including ancient indicators.
- The walls dividing the site are evident on an old map in the National Library of Scotland dating back to the 1790’s and again on an area survey map 1850-51

(Yorkshire Sheet 288). (There are reasons to believe that the boundaries pre-date these maps.)

- There are only two gate access points throughout its length which divides the site entirely.
- Whilst the conditions for NES39 acknowledge that there are features of heritage and archaeological importance present, none are specified, leading to ambiguity and possibly suggestive of the old workings of recognised importance and protected by the LWS.
- No recognition of the wall as a specific heritage feature has been made in the Main Modifications documentation and therefore protective buffers for the wall have not been made a condition.
- Also absent in documentation, is how access across the whole site will be achieved with the wall in situ, and protected, since it has not been accounted for.
- The 'mock-up' plans showing potential development layout, clearly shows the wall removed.
- Since 'wholly exceptional circumstances' (Biodiversity and Development Policy) are required for removal of heritage walls and priority habitats, a site-specific assessment would be appropriate and should be undertaken.
- On this basis, calculations for available build site may be wrong and access to the northwestern side of the land (Middleton Lane) may be problematic. Additionally, excavation may jeopardise the wall, particularly as it sits atop the steep slope.

6. Ecological and Biodiversity Concerns

- The site directly borders Cinder Hill Brook Local Wildlife Site
- The Main Modification requires a minimum 15m buffer, ecological corridors and Biodiversity Net Gain
- However, no evidence is provided that a 15m buffer is sufficient and ecological conclusions rely on future assessments.
- The Statement of Common Ground states no constraints are identified but further ecological work is required.
- This indicates that ecological suitability is assumed, not demonstrated.
- What needs to be completed:
    - Local species records
    - Use of site by wildlife
    - Condition of hedgerows / grassland
- A full assessment of the Ecological biodiversity of this site is required to appreciate the consequences and impact of development on wildlife.
- The Integrated Impact Assessment states that the Plan performs worse environmentally. The NPPF states that plans should 'promote the conservation, restoration and enhancement of priority habitats.'
- Under GS5, the Plan's own framework elevates species rich hedgerows to require a nationally much higher level of protection to justify harm. Such hedgerows were found on NES39 but have not been accounted for in the Main Modifications.



- The conditions for NES39 acknowledge that there are ecological sensitivities regarding the site. An unofficial assessment highlighted hedgerows H2 and H3 are species rich with an underplanting of ancient indicators. This will have consequences in terms of buffer protections not accounted for.
- Sections of the site are also potential acid grassland, as suggested by juniper haircap and multiple gorse bushes found on the slope adjoining Middleton Lane and leading to the LWS. A 15m minimum buffer could prove wholly inadequate. Again, this could result in a reduction of land availability, bringing into question site access and the viability of build.
- The heritage wall: its protection and biodiversity contribute to the complexity.
- Badgers, (filmed) foxes, grass snakes and bats frequent the area. Birds of prey; Buzzards, Red Kite, Kestrels, Sparrowhawks, Tawny and Barn Owls hunt across the whole site. Swallows nest in the stables and 22 varieties of songbird has been identified. Voles use and live in the wall as does a weasel, (too quick to capture on film).
- A full assessment of the Ecological biodiversity of this site is required to appreciate the consequences and impact of development on wildlife. The Plan cannot protect what it does not know is there.

Estimate MM – 353 (NES 39)

Analysis of hedgerows and landscape features – consequent reduction in available build site.

Feature/Description	Ancient Indicators	Must be retained	Length	Width	Buffer side 1	Buffer side 2	H & Buffer(sq m)
Hedgerow 1 (bordering Wheel Lane) Mixed hedge **not** *species rich* 156.00	No	No	39	2	2	0	156.00
Hedgerow 2 (bordering Middleton L) – Species rich with mature trees	Yes	Yes	197	10	5	0	2955.00
Hedgerow 3 (eastern side adjoining next field) – Species rich with trees	Yes	Yes	107	7	5	1	1391.00
Internal Heritage Wall – With undergrowth running from the house down to the LWS	Yes	?	197	0.5	5	5	2068.50
1 LWS	Yes	Yes	181	15	–	–	2715.00

Item	Value
Total hedge + buffer area (m²)	**9285.50**
Site area (Ha)	**2 . 1**
Net capacity (Ha)	**1.89**
Council allowance for buffers (Ha)	**0.21**
Your estimate for buffers (Ha)	**0.93**
Impact on site capacity (Ha)	**0.72**
Estimated reduction in number of homes	**25**

Supplementary notes

- There is potential acid grassland on the western side of the site over an extensive area – this will need ecological assessment that may have further consequences for reduction in available land for development.
- Species rich hedges are considered irreplaceable habitats and therefore can only be removed only in 'wholly exceptional circumstances' rather than 'exceptional circumstances'.
- The heritage wall with considerable undergrowth dates to at least the 1790s and runs effectively down the whole of the site, following the curve of the landscape with only 2 gate accesses along its length.
- Evidence of an adjoining wall is still in situ and features within the potential acid grassland. There does not appear to be allowances made for the wall's retention or historic setting.
- Accessing the western site, which slopes significantly, does not appear feasible without its removal. Excavations without significant boundaries in place are likely to destabilize the structure.
- It is noteworthy that ancient plant indicators at the wall, suggest that the soil beneath is unlikely to have been disturbed and is therefore 'old'.
- It is difficult to see how the western side of the land could be developed with either the removal of part of the heritage wall or species rich hedgerow whilst retaining the boundaries required on the unaffected sections. The steep topography adds to the challenges.
- Badgers have been filmed on the site, bats and grass snakes in evidence.
- Maximum depth of buffers rather than the minimum proposed should be afforded to protect the richness of the ecology on site.
- An ecological report is required to fully appraise this allocation.

7. Mining and Ground Contamination / Stability Risks

- EXAM 188 confirms that NES39 is not affected by historic mining activity and does not require a Coal Mining Risk Assessment.

- However, this reinforces the inconsistency within the allocation portfolio, where sites with no mining constraints are considered alongside others with significant and complex risks. The Plan does not demonstrate how these differences have been assessed in determining site suitability or deliverability.
- The Statement of Common Ground confirms Phase 1 and Phase 2 investigations are required.
- This indicates ground conditions are not yet fully understood. Suitability depends on future investigation, not current evidence.
- What needs to be completed:
    - Any known contamination or landfill
    - Ground stability concerns.

8. Local Infrastructure Capacity

- Contributions to infrastructure (schools, healthcare, etc.) are to be determined through future planning applications.
- No evidence is provided on existing capacity or cumulative demand.
- Infrastructure provision is not evidenced at plan stage.
- What needs to be completed:
    - Local GP capacity
    - School capacity
    - Other service pressures
- With a rising elderly population with increasing needs, local GPs and dental services in Grenoside, Ecclesfield and Chapeltown are currently reporting significant waiting lists. Residents have reported waiting times for GP appointments exceeding 2wks as all report as being at or near capacity.
- Whilst the Sheffield Plan recognises current constraints and identifies that future gaps in healthcare provision will need targeted intervention, particularly with regards to planned growth, critical issues of infrastructure or deliverability remain unaddressed.
- The Infrastructure Delivery Plan (IDP) does not provide for the expansion of health or transport services in these specific areas and NES39 is physically distant and categorised as ‘edge of urban’.
- There is no commitment to new primary care facilities or a binding timeline for expanding existing surgeries, (already at capacity), before the first homes are built and occupied.
- There is no plan to ensure the safe provision and threshold of health care services on a patient-to-doctor ratio as phases of development progress.

9. Deliverability and Phasing Uncertainty

- NES39 is expected to deliver in approx. 2029–2032.
- However, no planning application exists, multiple assessments are incomplete and delivery depends on unresolved conditions.
- The site must coordinate with NES37, but no agreement exists and NES37 is expected later (c. 2033/34 onwards)
- This creates a timing mismatch and uncertainty.
- Either NES39 proceeds without coordinated infrastructure, or delivery is delayed. Neither scenario is addressed.

10. Conclusion

- The Main Modification for NES39 does not resolve key site-specific issues:
    - Green Belt role and harm remain.
    - Landscape and visual impacts are not addressed.
    - Ecological constraints are unresolved.
    - Access and highways are not evidenced.
    - Infrastructure provision is unclear.
    - Delivery depends on future work and unresolved conditions.
    - Coordination with NES37 is not agreed.
- The site's suitability, deliverability and effectiveness remain unproven at allocation stage.
- No site-specific viability appraisal has been provided within the Main Modifications documentation or supporting evidence.

1. **Lack of Site-Specific Viability Evidence**

- Whilst the Main Modifications are supported by updated evidence including;
- The Level 2 SFRA, the Green Belt Review EXAM 136B and the Whole Plan Viability Assessment (WPVA) none provide a viability appraisal for NES39.

2. **Known Cost-Drivers Requiring Viability Testing**

- Flood risk mitigation.
- Access and topographical constraints
- Infrastructure requirements and co-ordination with NES37
- Outstanding justification from Green Belt release
- All these factors have cost implications, yet no viability evidence has been produced to demonstrate that development is deliverable.

3. **Inconsistency with Evidence Provided for Other Sites**

- Other allocations in the Sheffield Plan have been supported by;
    - site-specific viability commentary
    - Developer-submitted viability notes
    - Costed infrastructure assessments
    - NES39 has none of these, creating an evidence gap.
- The NPPF requires that allocated sites be deliverable and supported by proportionate evidence.
- Without a viability appraisal, the Council has not demonstrated that NES39 is financially deliverable, capable of supporting required mitigation or able to come forward within the Plan period.
- NES39 is not justified or sound because the Council has not provided the necessary viability evidence to demonstrate deliverability.

Requested change

We request that;

- **NES39 is removed from the Plan**, or
- Further work is required to demonstrate the following before allocation:
    - site suitability

- deliverability
- infrastructure provision
- ecological and landscape mitigation

REF5.0365

Outlook

Objection to MM411 - SES30 Site Inclusion

From [redacted]
Date Tue 2026-05-05 8:53 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>
Cc [redacted]

1 attachment (337 KB)
Claire Pennington Representation to the Sheffield Local Plan Main Modifications 5th May 2026.pdf;

External email

Dear Sir/Madam,

Please find attached my response to the invitation to submit a response on the Main Modifications proposed for the Sheffield Local Plan.

Please send confirmation that this has been received and logged.

Regards,

Claire Pennington

Representation to the Sheffield Local Plan Main Modifications - Objection to Allocation SES30 and Related Modifications

Sheffield City Council Local Plan – MM411 Objection to Site Inclusion

Objector: Claire Pennington

Address: [redacted]

Date: 5th May 2026

As per my previous responses to the 11th July & 10th December 2025 consultations I am writing to formally object to MM411, the allocation of SES30, on the basis that this allocation is not sound, legal, justifiable and would cause catastrophic damage to the S13 community, as well as having wider implications of destroying farmland at a time of uncertainty of supply in terms of food. I am asking for the site to be removed and for it to retain its Greenbelt designation. Further detail is contained in my previous 2 objections.

In his letter to our MP Clive Betts, Paul Morrison, the previous CEO of the Planning Inspectorate stated that this was our community's opportunity to have a "Fair Crack of the Whip" by engaging in the consultation process. We did that, we did not write about the loss of views or ask where we would walk our dogs, we invested our scarce resources in expert, independent planners and a Barrister. We came with evidence of lack of assessments, lack of application of the NPPF, incorrect numbers and methodology, all backed up by actual evidence. Thousands of residents engaged in a way that they had never before, in a process no one was familiar with. Even when late SCC assessments began to emerge, over 100 post the actual consultation period, we used this to show where the plan was unsound, we urged a rethink but rather than doing what any other business in the country would do when faced with a change in the base data, in which they have constructed an entire plan, the SCC planning team and the council just ignored this and carried on.

Surely once EXAMs 153, 175 and EXAM4Bi plus the lack of traffic, air quality and historic assessments and the risk to child safety should have been a red flag that the original assumptions on which the allocations were based were incorrect. They should have been reassessed along with the new data on the actual BMV classifications and the ongoing historical protection work. SCC were made aware of the application for consideration for historical protection for SES30, their own archaeological department has protected it, South Yorkshire Heritage have recommended it for protection, which we believe is imminent and Historic England are assessing it currently. Historic England does not waste resources assessing sites lightly or without merit.

How, given all of this, has this allocation not already been reconsidered by the SCC planning team, the council or a recommendation to do so included in the Inspectors January 2026 letter? Unless all of these issues will be addressed and remedied within the Inspectors final report, I am not sure anyone would consider the S13 community to have been given "a fair crack of the whip". It has shown an imbalanced, closed, bias process where a normal person has virtually no chance of being given a fair hearing when raising serious failings of a community.

I have detailed the key issues below, ranging from the concerning to the frankly absurd. Is the SCC planning team and Council Chairman really suggesting that out of 100+ potential Greenbelt sites, that SES30 was one of the best. If so, the City has a much bigger issue!

Handily, the Office of Clive Betts MP, multiple Land Owners/Agents and various Community groups have proposed, suggested, identified much more appropriate sites to allocate that would see

housing provision increased across the city rather than in 2 postcode areas but they appear to have been totally ignore by the SCC planning team, SCC Council and the Inspectorate to date. Hopefully these sounder options will be reviewed properly through the main modification process and an appropriate, balanced and sound plan for Sheffield will be constructed, which is not the case with the current plan.

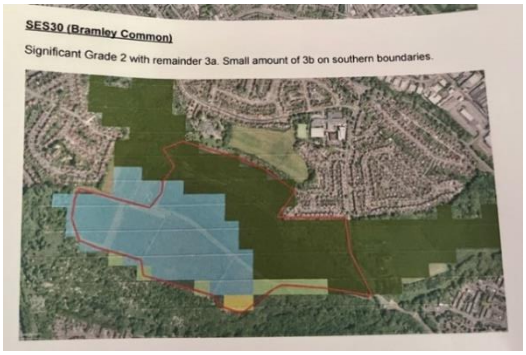
Key Constraints/Issues/Errors:

- Not demonstrated that the Golden Rules test has been met.
- Land already being farmed and confirmed as Grade 2 & Grade 3A BMV.
- Inappropriate & Inconsistent Site Selection Process versus other areas of the City with more appropriate sites to allocate.
- No Archaeological assessment despite having a known heritage asset on it.
- Recommended for archaeological protection by South Yorkshire Heritage and under assessment by Historic England.
- Limited Access only via Beaver Hill Road which the above protection would potentially stop leaving no obvious access to the site.
- Level 3 & 2 Flood Risk.
- Inaccurate Housing Capacity - overstated within the SCC Local Plan.
- 15 Mtr buffer not applied to plan and not sufficient given the scope of protected trees, ancient woodland, ancient hedgerows and wildlife.
- Protected water course/ancient hedgerow/ecological corridor in the middle of the site that cannot be built on and represent the greatest risk of flood.
- Proposed access passes through a designated Green Space.
- New Green Space provision a burial ground and secondary school which no “normal” people would be allowed to utilise as they do SES30. I am not sure how potential trespassing on school land classes as “access”.
- No mining assessment even though the site has been heavily mined.
- No traffic assessment or air quality testing even though a cursory look at the proposed access area shows it is already oversubscribed.
- No viability study showing actual cost to build even though in the S13 hearings it was stated by the SCC planning team that a bridge would need to be built and the Highways representative suggested a “loop” for the traffic on the estate given the “marooned” parcel ?! Both costly and not very desirable as housing estates go.
- The planned mitigation for the loss of Green Space is to make improvements to the Peak District Moors Special Protection area ? 10-15 miles, 30-45 minutes in a car, 60 minutes+ on the bus one way for the people of S13 to access in place of an area they used to walk safely to school ? From an area (S13) who have a lower than average cars per household number?

- IIA Addendum(4.2.10) puts SES29 & SES30 as a single “Strategic Location”. There is nothing strategic about S13 above anywhere else in Sheffield, SES29 and SES30 are not next to each other and they are not related to the Don Valley Strategic Initiative or Innovation Corridor. SES30 in particular is a total outlier. This blatant, late attempt to justify the allocation of these sites by adding them to a project that has been years in the making is frankly disgraceful. The “Map 3 the innovation district” document addition creates a false impression that SES30/SES29 must go forward for the Don Valley Strategy to be implemented which I believe is not true.

I have gone into more detail on the key issues below:

SES30 is Grade 2 (light blue) & Grade 3A BMV land – It has now been proven that the land in SES30 is of nearly the highest BMV quality in the UK. The attached map shows how rare this is in the context of the whole of Sheffield. In a time of significant global uncertainty with food security as a must it is not only in breach of the NPPF (the version that the plan is being assessed under) but this unchecked approach to the destruction of viable farm/food producing land risks the UK's food security.



Inappropriate Site Selection Process (Exam 136 V2) – The site selection process, ideally aligned to the Government Inspectors recommendation of identifying small green belt sites, should have been informed by the appropriate assessments and how they could be included to make a balanced plan for all of the people of Sheffield. It has been evidenced by the hearings and 2 other consultations that the sites were picked and made to fit.

Site selection criteria has not been applied fairly or as standard to all potential sites and there is no example that highlights this more than SES30 versus Ryecroft Farm. The application is contradictory and confusing as shown in Exam 136 V2. Both sites are SCC owned land, one farmed one with a horse riding school on it, one Grade 2 BMV one Grade 4, one in an area with over development, lack of infrastructure and a sluggish housing market, one with too few houses and prices not accessible to those earning the average UK wage. The piece of land with no value for farming in an area with no affordable housing and very high house prices is the one that the SCC planning team chose **NOT** to add to the plan over the valuable farm land, already over developed, historically significant and virtually last remaining piece of green space in the S13 area. I am not sure if there is a greater illustration of the poor decision making and inappropriate approach to site selection than this example. Food production is a Need, recreational horse riding is a Perk !

EXAM130B acknowledges Ryecroft Farm as a "strong performing Green Belt site" whose development would harm openness. Yet SES30; has a higher Green Belt assessment score, a higher BMV score (2 Vs 4 ALC categorisation of the Green Belt) has strong, defined boundaries, performs a critical role in maintaining separation between settlements, and is central to preventing urban sprawl between neighbourhoods, holds significant community value through daily recreational use and its function as "Bramley/Handsworth Common". Ironically Ryecroft Farm's agricultural value was cited as part of the rationale for non-allocation. Despite an arguably greater strategic function, SES30 is proposed for release while Ryecroft Farm is protected, on what basis?

SES30 Archaeological Protection – Had SCC planning team done the correct due diligence this would have be raised earlier but SES30 is of historic significance. It has been recommended to be adopted as a protected heritage site by South Yorkshire Heritage and is under assessment by Historic England for Grade 1 or Grade 2 listed status. The initial area of SES30 which has been assessed and recommended for protection is where the only access points for housing/burial ground/school have

been identified, off Beaver Hill Drive. There is also a working theory backed up by SCC archaeological department that, upon more detailed investigation, the area of protection and importance on SES30 will be expanded. This is in process and further updates on protection level and area will be sent to the SCC planning team.

Flood Risk – Since the original consultation in July 2025 the updated flood risk assessment showed that SES30 is a Zone 3 flood risk. Again, if the correct assessments had been done in the sequence outlined in the NPPF this would have been known and with all of the other constraints, it is likely this site would not have been allocated. Once the actual flood risk was known why was the site not reassessed/rescored ?

Traffic & Child Safety - No traffic assessment has been done even though all of the proposed development would merge onto the same road and utilise the same roads to leave the area as the Waverley Estate. The significant impact of the recent Lidl opening has also not been assessed or modelled even though it has caused traffic chaos at key times of the day since the traffic measures became live. Add in to the already challenging situation the proposed housing which would double the population of Handsworth, S13 (which is where the proposed building is in – current population circa 9,000) and it is not a stretch to say this would be catastrophic for the area. In addition, there is a child safety risk given the removal of a heavily used walking and cycling access (SES30) to both Ballifield and Handsworth Grange schools. The removal of this well used and safe root pushing children to walk on the very busy Handsworth Road or more parents to drive adding to the already significant traffic congestion would see streams of children walking down a narrow pavement is at best unadvisable at worst a risk to life. Anyone who has taken the time to visit the area at school/work time in the working week would know this and see the very real risk. It does not appear that anyone in the SCC planning team has done this.

Inaccurate Housing Capacity – For some reason and despite the significant evidence presented in terms of the multiple and significant constraints in terms of the development of SES30, neither SCC planning team nor the Inspectors have raised the fact that the numbers presented in terms of housing capacity/deliverability for SES30 are fundamentally flawed and incorrect. The original plan had inaccurate and missing buffers for ancient woodland, hedgerows and the unnamed water course/ecological corridor. It did not account for the SUDS and bridges described in the hearings. It had not accounted for the footpaths that were not in the original plan and the list goes on. All of these things cut down the developable land meaning that the housing stated for SES30 cannot be delivered. **In a plan with a very narrow margin of buffer if all of the new sites have been miscalculated in this way why has the actual housing capacity of the proposed sites not been updated as a true reflection of that the plan and main modifications can deliver?**

Since the announcement of the proposed addition of Greenbelt sites across the City at the end of April 2025 there have been two separate Local Plan consultations as well as a hearing session to consider Site SES30. Across those sessions, extensive evidence was presented by community groups, professional planners (including former local authority planning officers), and the S13 planning barrister. That evidence relied heavily on Sheffield City Council's own assessments and published evidence base.

A number of clear and material planning constraints were identified, many of which were effectively common ground between the Council and those presenting evidence. In several instances the Council did not dispute the substance of those points during the hearings.

Despite this, the Inspectors' subsequent letter and the Main Modifications do not appear to reflect or meaningfully address the seriousness of these constraints or their implications for deliverability, housing numbers, viability, or compliance with national planning policy. The only point that has been actioned is when the S13 group provided evidence that SCC did not own or have access to a parcel of land in SES30 which, up until this evidence was sent to the Government Inspectors by the S13 group, the SCC planning team were not aware of, which appears to show that the correct level of due diligence had not been carried out on this site and it would appear through other evidence presented at the hearing sessions that this was not an isolated incident in terms of putting forward land that was not available. This is itself should have surely been more of a red flag to the Government Inspectors than it appears to have been.

The following extract from the hearing sessions illustrates the nature and extent of the issues raised regarding SES30.

Extract from Hearing Session Evidence

Rowan Clapp, S13 Barrister - "A quick point that I think has been saved until now.

The site is in agricultural use at the moment. The Council haven't assessed whether it is BMV (Best and Most Versatile) land or not. We know it is Grade 3 land, but we do not know whether it is Grade 3a or Grade 3b. You have my submissions on the appropriateness of when that assessment should take place from the previous session.

To draw a few things together for the S13 Group on the planning issues at SES30.

The issues affecting the site that I think are effectively common ground between the Council and us include:

- ***Areas of the site are in Flood Zones 2 and 3***
- ***There is a waterway running through the site***
- ***The site requires a 15 metre buffer to the south which has not been included in any plan***
- ***A private landowner owns part of the site***
- ***The land has been recognised as desirable as a Biodiversity Net Gain (BNG) site on the national register***
- ***As far as the Council are aware the entire site could be comprised of Best and Most Versatile agricultural land***
- ***Parts of the site are part of a former mine***
- ***Parts of the road network would be operating at near 100% capacity (after mitigation) if the proposal comes forward***
- ***One of the proposed access routes passes through a designated green space***
- ***The Council has not considered how access to the northern portion of the site – effectively marooned by constraints – would be provided or how the required number of dwellings there would be served***
- ***There has been no site-specific viability analysis despite the constraints identified***

• The existing viability analysis has not been updated to reflect current build costs or Community Infrastructure Levy inputs for several years

• The total developable area of the site is clearly significantly less than claimed

It is accepted that this process is not dealing with a full planning application. However, the site plainly has numerous characteristics that make it an obviously undesirable allocation. Even setting that aside, the site is not going to deliver anything like the quantum of housing suggested in the plan, nor will it do so at the delivery rate assumed.

Given the constraints outlined, there are serious and open-ended viability concerns about the ability to develop the site at all.

For these reasons, we say this should not be included as an allocation."

The Planning Inspector's (Katie Childs) response at the hearing was:

"Ok thank you for that. Did the Council want to say anything in response? … No? I don't blame them."

This exchange demonstrates that the issues raised were neither speculative nor trivial; they were substantive planning constraints that were not disputed during the hearing. I cannot read into what the Government Inspector's meaning was in terms of her "I don't blame you point" but it would suggest that there was recognition that there were wide ranging challenges with the site which the SCC planning team had no real response or solution for.

Given the extent of the issues identified during the hearings, it is difficult to reconcile the Inspectors' subsequent conclusions with the evidence presented.

The Main Modifications do not meaningfully engage with the planning, environmental, infrastructure, viability and deliverability concerns raised. Nor do they explain how those constraints could realistically be overcome without fundamentally reducing the developable area of the site. Given what has been termed as a "narrow" buffer in terms of achieving the overall housing numbers in the plan the move from 868 houses to around 500 houses being delivered from SES30 has a material consequence in terms of the soundness and deliverability of the plan which seems to have been largely ignore in the main modifications.

Indeed, the overall viability of the site for any development is not clear cut as shown by the Council's responses during the S13 hearing relying heavily on hypothetical mitigation measures, including:

• Creating a "loop" road to address access limitations to the "marooned parcel" of the proposed SES30 development. I am not sure how many people want to buy a house on an estate of circa 900 houses that is effectively on a one way system?!

• Constructing one or more bridges to cross the watercourse/environmental corridor. Its Handsworth, not Narnia or Venice ! I think if you have to suggest a bridge or 2 the overall flood risk and impact of that level of development should give you pause.

• Installing extensive Sustainable Drainage Systems (SuDS) infrastructure such as ponds to address flood risk.

Each of these measures would significantly reduce the developable land area as well as increasing cost. However, the Local Plan housing numbers appear to have been calculated without accounting

for the land take required by this mitigation infrastructure or the other elements which has not been properly accounted for such as the hedge row buffers etc.

Once these factors are properly accounted for, the realistic housing capacity of the site is likely to be substantially lower than the figure presented in the plan.

Based on the constraints identified during the hearings, it is reasonable to conclude that the deliverable housing capacity could be closer to approximately 500 dwellings, representing a reduction of more than one third from the allocation currently stated in the plan.

The absence of a site-specific viability assessment is particularly concerning. The current viability modelling:

• Has not been updated to reflect modern construction costs.

• Does not incorporate the additional infrastructure required to overcome site constraints.

• Does not appear to reflect updated Community Infrastructure Levy assumptions.

I appreciate that there is some strange JV in place with KeepMoat homes but again I don't think effectively subsidising a builder with public money to make the development of SES30 viable is appropriate either. Surely SCC have spent enough public money attempting to justify this unjustiable part of their plan ?

Given the combination of flood risk mitigation, bridging infrastructure, access requirements, environmental buffers, biodiversity requirements, and mining constraints, the viability of the site is highly uncertain. Without updated viability testing, the allocation cannot be considered robust or deliverable.

In addition to all of the above SES30 is currently in agricultural use. The SCC planning team had determined that the land on SES30 was low grade but that is not accurate. The majority of SES30 is Level 2 with the remainder Level 3a BMV. The light blue colour on the map above within this representation shows how rare that is and SCC want to build on it.

The National Planning Policy Framework places significant emphasis on protecting the best and most versatile agricultural land. Allocating a potentially BMV site without properly assessing its classification raises serious concerns regarding compliance with national policy. Given the current geopolitical environment and the uncertainty around shipping and consequential food security, targeting and destroying our most valuable land which delivers food and domestic food security should surely be avoided at all costs? Yet in this plan it seeks to remove just under 200 hectares of this land in spite of other parcels of land being put forward and SCC's own land that I highlighted in my previous submission and above not being agricultural and having the same potential for development.

During the hearing sessions it also became clear that the proposed secondary school allocation associated with SES30 may not be required for the S13 catchment area.

Evidence presented suggested:

• The school provision was not necessary to meet demand within the S13 area.

• It was unlikely that students would travel from other parts of the city to attend a school at this location

This further undermines one of the key justifications presented for the allocation. The allocation of significant housing development in the S13 area also raises wider strategic concerns regarding the distribution of housing across Sheffield.

Out of approximately 35 areas within Sheffield:

• The S13 area already sits within the top ten areas in terms of social housing provision.

• Some areas of the city currently have no social housing provision at all.

The current plan places the social housing provision in the areas that already have the highest leaving areas with a need such as near the 3 City Hospitals without a plan for more accessible housing for the duration of the plan. How is that a fair and appropriate plan for residents of the City of Sheffield?

This highlights a broader structural issue with the plan: housing is being disproportionately directed toward areas that already accommodate significant social housing provision, while other parts of the city remain largely untouched by new allocations.

A more balanced distribution of housing development would better align with the objectives of sustainable and equitable urban planning.

It is important to emphasise that the S13 community response to this allocation was not based on subjective concerns such as views or recreational use of land.

The S13 Save the Greenbelt Sapphire McCarthy campaign actively sought professional planning advice from qualified planners with extensive experience in preparing and assessing local plans, including individuals who previously worked within local authority planning departments.

Those planners provided advice grounded in the requirements of the National Planning Policy Framework (NPPF) and the legal framework governing plan preparation.

In addition, a planning barrister was instructed to review the plan and submissions to ensure that objections were framed around clear breaches of national planning policy and procedural requirements, rather than general opposition.

The concerns raised during the hearings and in this submission raise serious questions about whether the Local Plan meets the tests of soundness set out in the NPPF.

In particular, the plan must be:

• Justified – based on proportionate evidence

• Effective – deliverable over the plan period

• Consistent with national policy

Given the constraints identified and the lack of updated viability analysis, the SES30 allocation does not appear to meet these tests.

For the reasons set out above, there continue to be serious concerns regarding the continued inclusion of Site SES30 within the Sheffield Local Plan. It must be removed.

In summary:

• Numerous material planning constraints affecting the site were identified during the hearing sessions

• Many of those constraints were not disputed by the Council

• The mitigation measures suggested would significantly reduce the developable area of the site

• The housing capacity currently stated in the plan appears substantially overstated

• No updated viability assessment has been undertaken despite significant infrastructure requirements

• The classification of the land as potential Best and Most Versatile agricultural land makes it unique and should be afforded protection under the NPPF.

• The justification for the associated secondary school allocation is weak

• The distribution of housing across Sheffield remains inequitable, with the S13 area already carrying a disproportionate share of social housing provision

Taken together, these issues call into serious question the soundness, deliverability, and policy compliance of the SES30 allocation. Accordingly, the site should either be removed from the Local Plan allocation entirely.

Without such reconsideration, the allocation risks undermining the overall soundness of the Local Plan. It is also notable that national political leadership has recently emphasised the importance of plan quality and the protection of agricultural land. The Housing Minister, Matthew Pennycook, has stated that “no plan is better than a bad plan” when referring to the need for local plans to be robust, evidence-based, and deliverable. The current SCC Local Plan seems to fit into the latter rather than the former and its deliverability is in significant question. Similarly, the Prime Minister, Keir Starmer, has publicly stated that the Government does not intend to build over productive farmland in the United Kingdom. Given that SES30 is currently in active agricultural use and is the 2nd highest level of Best and Most Versatile (BMV) land, the continued inclusion of this allocation sits uneasily with those stated national priorities.

Sheffield City Council (SCC) has repeatedly emphasised that the city needs a Local Plan to manage development and prevent unchecked growth. However, the position for S13 in the current SCC local Plan is worse than any alternative. Outside of the Local Plan, much of the remaining green space in the area is already earmarked for development, which appears to be counted as “windfall” sites, yet this does not mitigate the significant loss of green space that the current plan would entail. There has been no meaningful dialogue regarding infrastructure. Roads are already at capacity with no practical scope for widening or extension, and ongoing development, such as the Waverley estate, continues to place pressure on transport, services, and local amenities, issues that SCC seems reluctant to recognise, partly because the area has a Rotherham postcode. This is exactly what duty to co-operate seeks to avoid and yet the view in the S13 hearing from the SCC Planning Team was that the flood risk and associated pressure from the Waverley Estate was “Rotherham’s Problem”.

The current plan disproportionately burdens S13, which, along with other areas in the east of Sheffield have already absorbed significant development, effectively shielding the west of the city and the city centre. The widespread opposition to the current Local Plan across Sheffield, including unprecedented collaboration between communities citywide, demonstrates that the plan has fundamental flaws. The Council has also failed to consider alternative sites that have been

nominated, applying inconsistent standards in site assessment, as illustrated by my previous objections with the example of Ryecroft Farm.

The S13 community has devoted significant time and resources over the past year to provide evidence, engage meaningfully, and protect their local environment, only to have these contributions dismissed. If this reflects the workings of an “independent process,” it raises serious concerns about fairness and the definition of “independence”. Thousands of Sheffield residents are prepared to continue challenging the plan to ensure that the city has a Local Plan that is equitable, lawful, and sound. The current Local Plan does not meet these standards, and it is crucial that this is recognised before further public resources are expended defending this plan.

At present no one seems willing to say that something is wrong even though it is very obvious. I hope that, through the Main Modifications process and the publication of the Inspectors’ final report, the substantive issues raised in relation to the allocation of SES30 and other similarly constrained sites will be fully and objectively addressed.

At present, there is a strong sense that significant and material constraints affecting certain allocations, particularly SES30, have not been adequately acknowledged or resolved. This raises concerns about the overall soundness of the plan, especially where such sites appear to present substantial delivery challenges.

In this final stage of the process, it is essential that the plan is assessed rigorously against the tests of soundness, including whether it is justified, effective, and consistent with national policy (just one not picking from 3 for which best suits), and ultimately whether it will deliver sustainable and appropriate development for the people of Sheffield.

On that basis, I consider that further changes are necessary, including the removal of SES30 from the plan. If it is unclear what other options are available, I am sure any of the community groups would be happy to meet with the planning team to support constructive discussions on getting to a fair, balanced plan without destroying the South East of the City.

REF5.0366

Outlook

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

From [redacted]
Date Tue 2026-05-05 8:57 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Strategic Planning Team,

I am writing to object to the proposed Main Modifications to the Sheffield Local Plan,
and particularly those that impact site SS19.

While I recognise the need for a sound and
deliverable plan, several of the modifications materially weaken safeguards that are
essential for public safety, statutory compliance, and the fair distribution of development impacts across the city.

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

I therefore set out below my objections to specific modifications.

MM7- This reframes the purpose of the Green Belt by highlighting only its role in
supporting urban regeneration, while omitting the full set of Green Belt purposes set out in the NPPF. This narrow and reductive wording misrepresents national policy, weakens the strategic function of the Green Belt, and risks distorting future decision-making by pop 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. Of 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. This is reflected in the amount of complaints made to councillors and transport companies about buses not turning up when scheduled, and driving by residents waiting at bus stops.

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. However 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.

This 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. It 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,

Sophie Jones

Sent from Yahoo Mail for iPhone

REF5.0367

Outlook

MM411 / ses30 beaverhill/bramley

From [redacted]
Date Tue 2026-05-05 8:57 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

FORMAL OBJECTION TO THE SHEFFIELD LOCAL PLAN
Main Modifications – Examination Stage
MM411 | SES30 – Land between Bramley Lane and Beaver Hill Road, Handsworth

Submitted by Chris Burkinshaw
Address: [redacted]

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

1. Introduction

I am submitting an objection to Main Modification MM411, which proposes allocating site SES30 — the farmland located between Bramley Lane and Beaver Hill Road in Handsworth — for the development of 827 homes, alongside a secondary school, a multi-faith burial ground, and its removal from the Green Belt.

[redacted] I regularly use these fields, as do many of my neighbours and a large number of local residents every day. This land is not just a marking on a planning document — it is an integral part of the local environment and community.

However, this objection goes beyond personal attachment to the land. The proposal is fundamentally flawed due to inconsistent evidence, procedural failings, and legal shortcomings. It should not form part of the Local Plan. I respectfully request that the Inspectors instruct that SES30 be withdrawn and permanently retained within the Green Belt.

2. This Allocation Should Not Have Been Introduced as a Main Modification

SES30 was absent from the plan at the point of submission for examination. Its introduction at the Main Modification stage has been presented as a minor adjustment, but in reality it represents a completely new and substantial proposal. At 36.55 hectares, incorporating 827 homes and significant infrastructure, it is one of the largest allocations in the plan.

Crucially, it has not been subject to the full Regulation 18 and 19 consultation stages required under the Town and Country Planning (Local Planning) (England) Regulations 2012. This is not a minor procedural issue — it has denied a large number of residents the opportunity to properly engage with the proposal at the appropriate stage.

Furthermore, over 100 relevant examination documents were released after the consultation had already begun. This made it effectively impossible for residents to provide informed responses within the timeframe given. This procedural failure alone provides sufficient justification for rejecting MM411.

---

3. Legal Compliance

Environmental Assessment Regulations 2004
The Council is legally required to demonstrate that all reasonable alternatives have been properly considered. However, there is no site-specific assessment of SES30 within the Integrated Impact Assessment or Habitats Regulations Assessment. As a result, the Council cannot demonstrate that this is the least harmful option available, as required by law.

This is especially inconsistent with the Council's stated "brownfield-first" approach, as there is no clear evidence that all suitable brownfield sites were exhausted before proposing development on Green Belt land.

Duty to Cooperate
The Duty to Cooperate is a statutory requirement, not a procedural formality. There is insufficient evidence that Sheffield City Council has meaningfully engaged with neighbouring authorities — particularly Rotherham — to explore cross-boundary housing solutions that could reduce pressure on Handsworth's Green Belt. Without such evidence, this legal requirement has not been met.

Wildlife and Biodiversity Law
No protected species surveys were conducted prior to allocating SES30. This omission is significant. Legal obligations under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017 have not been fulfilled. The Habitats Regulations Assessment does not demonstrate that protected sites will remain unaffected.

Additionally, the removal of soil survey requirements under MM184 weakens safeguards at a critical stage.

Flood Risk and Sequential Testing
Recent Level 2 Strategic Flood Risk Assessments confirm that flooding presents a genuine constraint on this site. The presence of natural springs, watercourses, and historical mine workings increases this risk.

National policy requires the Sequential Test (and Exception Test where applicable) to be applied before allocating such land. There is no adequate evidence that this has been properly undertaken, rendering the allocation legally questionable.

---

4. Failure to Meet the Tests of Soundness

Not Positively Prepared
The requirement for additional housing does not automatically justify releasing Green Belt land. The Council has not demonstrated that less harmful alternatives have been fully explored.

The burden placed on Handsworth is disproportionate. The area is expected to accommodate over 40% of all Green Belt housing in Sheffield, despite 96% of the city's Green Belt remaining untouched. No justification has been provided for this imbalance.

Not Justified
There are clear inconsistencies in the Council's own archaeological evidence. Earlier documents identify significant constraints, including potential Iron Age and Romano-British remains, while later reports downplay or omit these findings entirely.

This contradiction undermines the reliability of the site's assessment and the assumptions made about its development capacity.

Not Effective
There are serious concerns regarding deliverability:

- Access relies entirely on Beaver Hill Road, where safety issues already exist
- Heritage assets, including the Cinder Hill Quaker Burial Ground, have not been fully assessed
- Ecological constraints, including proximity to ancient woodland, have not been adequately addressed
- Agricultural land of high quality is being lost without proper evaluation
- Public open space currently in active use will be removed with no replacement provision
- Infrastructure requirements (roads, healthcare, schools) are not supported by a funded plan

Not Consistent with National Policy
The proposal conflicts with multiple sections of the National Planning Policy Framework (NPPF), including protections for Green Belt land, agricultural land, heritage assets, biodiversity, and open space.

It also fails to meet the "Golden Rules" for Green Belt release, particularly regarding affordable housing and infrastructure provision.

---

5. Historical and Community Significance

This land has a long and continuous history of use, dating back to at least the Domesday Book. It has been part of the local landscape and community life for centuries.

The presence of the Cinder Hill Quaker Burial Ground further adds to its historical importance. Its significance is still under formal assessment, making it inappropriate to allocate the site for development at this stage.

Public access and community use of the land are well established. It functions as open space in every practical sense and should be protected accordingly.

---

6. Housing Capacity Is Overstated

The figure of 827 homes is not realistic. Constraints such as archaeological exclusion zones, flood risk areas, ecological buffers, and existing rights of way significantly reduce the developable area.

These limitations have not been properly accounted for in the Council's calculations, calling into question the credibility of the projected housing numbers.

---

7. Conclusion

This proposal is procedurally flawed, legally unsound, and fails all four tests of soundness.

Key issues include:

- Inadequate consultation
- Conflicting and unreliable evidence
- Failure to meet national policy requirements
- Lack of infrastructure planning
- Disproportionate impact on a single community

Each of these concerns is serious in its own right. Taken together, they clearly demonstrate that this allocation is not justified or deliverable.

I therefore request that the Inspectors remove SES30 from the Sheffield Local Plan and ensure that this land remains protected as Green Belt.

Chris Burkinshaw

[redacted]

REF5.0368

Outlook

Sheffield's Plan and a new model

From [redacted]
Date Tue 2026-05-05 8:58 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

[redacted]

Sheffield City's plan is OK, but it lacks vision and any real ambitious content in terms of the specific projects that could bring about the Region's much wanted economic and social transformation. This Council, like others, doesn't have the money to realise the game changing possibilities required to achieve the enormous potential of the people, the City and the City Region.
The plan lays out the constraints or guidelines within which developers can operate, and lists of things it will achieve as part of its public service role, without being able to really describe the things itself that could bring about the economic boost to help pay for social services. So, if any money is to be made in Sheffield it is collected by the developers and entrepreneurs for themselves and taken out of the City.
The various stakeholders, of which the Council could be considered to be the most important, have to come together with the belief that by pooling their knowledge of the City, its strengths and assets, such as its best businesses, its Universities, the people themselves, especially the young ones, etc., to create an economic powerhouse that will catapult Sheffield back into the world arena and maximise the City's ability to help its citizens to find personal fulfilment, prosper and thrive whilst making money that, without more debilitating taxation, can be used to provide a long term source of funds to service the escalating, expensive and even unserviced social needs.

There's a need for a different way of doing things for everyone's benefit, that will attract the money required to deliver the City's dream. This model would not only transform Sheffield it would become an example for others to follow and they would visit the City to see how it is being done.

There are wealthy people wanting to make a difference, who say, "Where's the plan that will transform Sheffield? What do they want to do? How many billions will all of that cost? Don't worry about the money. We'll supply all of the money and use the net earnings every year from investments in the local businesses and rentals from real estate to financially support the local social services. The bigger the overall project the better." They say, " We'd expect to collect about 5% each year from the total project cost to use on the social services identified by the City's representatives. Let the Council do the basic arithmetic to calculate what a difference that would make,"

What sort of things could Sheffield do?

Sheffield has two world class universities each with hundreds of people doing leading edge research about Health and Wellbeing. We should build an international conferencing facility to share the knowledge found in Sheffield and invite other world leaders in the field to come to Sheffield to share their findings. The complex would be a one billion pounds architectural masterpiece designed to grab the world's attention and compete with the likes of Dubai and Las Vegas and be able to accommodate thousands of delegates in excellent conditions including a conference and Concert hall.

What support measures for social enterprise – funding and other support – do you think are most likely to have a transformative impact?

The Region and City Councils and their executive officers have to really embrace the possibilities by working with the key stakeholders as quickly as possible and commit to preparing a transformation plan by doing everything in their power to support the projects proposed. Little will be achieved unless all parties really work closely together via the City and Region's Councils and in cooperation with the other stakeholders in genuine partnership with

those wanting to make the difference. Of course everyone needs to agree on the merit of the proposed projects and be sure that their accompanying comprehensive finance is in place and is big enough to grab the leaders' attention.

What else needs to be done to build a thriving social economy in South Yorkshire?

The interested parties must be bold and identify large areas for transformation, like the east-side of Sheffield, for instance. The proposals will usually need to include as fundamentals substantial environmental improvement (Sheffield University is reputed to have one of the best Landscaping Depts anywhere) to make the places where people would really like to live, and build new affordable homes in pleasant neighbourhoods. The Region recognises that innovation could be the key to putting Sheffield back where it once was in the World's economic arena. These possibilities can be created in South Yorkshire especially by investing in local expertise and research, possibly via the Universities, to bring new jobs and rewarding career opportunities. The wealth created as a result of the transformation must be shared with the people and be used in the long term to help pay for social and public services that improve everyone's circumstances including their health and wellbeing.

Otherwise I send best regards

Conrad Aldridge

[redacted]

REF5.0369

Outlook

Site ses30

From [redacted]
Date Tue 2026-05-05 9:02 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

FORMAL OBJECTION TO THE SHEFFIELD LOCAL PLAN
Main Modifications – Examination Stage
MM411 | SES30 – Land between Bramley Lane and Beaver Hill Road, Handsworth

Submitted by Mrs J Pemberton
Address: [redacted]

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

---

1. Introduction

I wish to formally object to Main Modification MM411, which proposes allocating site SES30 — the farmland situated between Bramley Lane and Beaver Hill Road in Handsworth — for a development of 827 homes, together with a secondary school, a multi-faith burial ground, and its removal from the Green Belt.

[redacted], along with many others in the area, regularly use these fields. They are well-used by local residents for walking, exercise, and recreation. This land is not simply a site marked for development — it plays an active role in the daily lives of the community.

My objection is not solely based on the value of the land to residents. More importantly, the proposal is fundamentally flawed due to procedural errors, conflicting evidence, and failures to meet legal requirements. For these reasons, it should not proceed. I respectfully request that the Inspectors remove SES30 from the plan and retain it as Green Belt land.

---

2. Inappropriate Introduction as a Main Modification

SES30 was not included in the original plan submitted for examination. Its addition at the Main Modification stage is being treated as a minor amendment, when in reality it represents a significant and entirely new allocation.

Covering 36.55 hectares and including substantial development, it should have been subject to full consultation under Regulations 18 and 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This has not occurred, meaning many residents were denied the opportunity to comment properly.

In addition, more than 100 supporting documents were released after the consultation period had already begun. This made it extremely difficult for residents to review the information and respond effectively. This lack of fair and transparent process is, in itself, sufficient reason to reject MM411.

---

3. Legal Concerns

Environmental Assessment Requirements
There is a legal obligation for the Council to assess all reasonable alternatives before selecting sites for development. However, no detailed, site-specific assessment of SES30 appears in the relevant environmental reports. This means the Council cannot demonstrate that this is the least harmful option, as required.

This is inconsistent with the Council's claim that brownfield sites were prioritised before considering Green Belt land.

Duty to Cooperate
The Duty to Cooperate requires meaningful collaboration with neighbouring authorities. There is little evidence that Sheffield City Council has properly engaged with nearby councils, particularly Rotherham, to explore alternative housing solutions across boundaries. This suggests the requirement has not been adequately fulfilled.

Ecology and Wildlife Protection
No surveys for protected species were carried out before the site was proposed for allocation. This raises serious concerns regarding compliance with wildlife legislation. The relevant assessments do not clearly show that protected habitats or species will not be affected.

Furthermore, the removal of requirements for soil surveys weakens environmental safeguards at a crucial stage.

Flood Risk Considerations
Recent flood risk assessments indicate that flooding is a genuine issue on this site. Natural water features and historic mine workings add to the complexity.

National planning policy requires proper application of the Sequential Test before allocating land at risk of flooding. There is insufficient evidence that this has been carried out, making the proposal questionable in legal terms.

---

4. Failure to Meet Soundness Criteria

Not Positively Prepared
While additional housing is needed, this does not justify the release of Green Belt land without fully considering less harmful alternatives. There is no clear evidence this has been done.

Handsworth is being asked to accommodate a disproportionate share of development, with over 40% of the city's Green Belt housing concentrated in one area. No clear reasoning has been provided for this imbalance.

Not Justified
There are inconsistencies in the Council's own findings regarding archaeology. Earlier evidence highlights potential significant remains, while later documents minimise or omit these concerns. This raises doubts about the reliability of the site's assessment.

Not Deliverable (Not Effective)
There are multiple practical issues affecting delivery:

Access depends heavily on Beaver Hill Road, which already raises safety concerns

Heritage features, including the Quaker burial ground, have not been fully assessed

Environmental constraints, including nearby ancient woodland, have not been adequately addressed

Loss of productive agricultural land has not been properly evaluated

Existing public use of the land will be lost without replacement provision

No clear or funded plan exists for necessary infrastructure such as roads, healthcare, and school places

Not Consistent with National Policy
The proposal conflicts with several elements of the National Planning Policy Framework, including those relating to Green Belt protection, biodiversity, heritage, flood risk, and open space.

It also falls short of the requirements for development on released Green Belt land, particularly in terms of affordable housing and infrastructure commitments.

---

5. Importance of the Site

The land at SES30 has historical significance, with evidence of long-term use dating back many centuries. It has formed part of the local landscape and community for generations.

The presence of the Cinder Hill Quaker Burial Ground further adds to its importance. As its significance is still under review, it is premature to allocate the site for development.

The fields are also widely used by local residents for recreation and exercise, functioning effectively as open space. Their loss would have a clear impact on the community.

---

6. Overestimation of Housing Capacity

The proposed figure of 827 homes does not appear realistic. Constraints such as archaeology, flooding, ecological buffers, and existing pathways reduce the area available for development.

These factors have not been fully reflected in the housing calculations, meaning the expected capacity is likely overstated.

---

7. Conclusion

This proposal suffers from serious procedural, legal, and practical flaws. It fails to meet the required tests of soundness and conflicts with national planning policy.

Key concerns include:

Lack of proper consultation

Conflicting and incomplete evidence

Failure to meet environmental and legal obligations

Absence of a clear infrastructure plan

Disproportionate impact on one area

Taken together, these issues demonstrate that the allocation is not justified or deliverable.

I therefore ask that the Inspectors remove SES30 from the Sheffield Local Plan and ensure that this land remains designated as Green Belt.

Mrs J Pemberton
[redacted]

REF5.0370

Outlook

Site ses30

From [redacted]
Date Tue 2026-05-05 9:03 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

FORMAL OBJECTION TO THE SHEFFIELD LOCAL PLAN
Main Modifications – Examination Stage
MM411 | SES30 – Land between Bramley Lane and Beaver Hill Road, Handsworth

Submitted by Mr c Pemberton
Address: [redacted]

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

---

1. Introduction

I wish to formally object to Main Modification MM411, which proposes allocating site SES30 — the farmland situated between Bramley Lane and Beaver Hill Road in Handsworth — for a development of 827 homes, together with a secondary school, a multi-faith burial ground, and its removal from the Green Belt.

[redacted]I, along with many others in the area, regularly use these fields. They are well-used by local residents for walking, exercise, and recreation. This land is not simply a site marked for development — it plays an active role in the daily lives of the community.

My objection is not solely based on the value of the land to residents. More importantly, the proposal is fundamentally flawed due to procedural errors, conflicting evidence, and failures to meet legal requirements. For these reasons, it should not proceed. I respectfully request that the Inspectors remove SES30 from the plan and retain it as Green Belt land.

---

2. Inappropriate Introduction as a Main Modification

SES30 was not included in the original plan submitted for examination. Its addition at the Main Modification stage is being treated as a minor amendment, when in reality it represents a significant and entirely new allocation.

Covering 36.55 hectares and including substantial development, it should have been subject to full consultation under Regulations 18 and 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This has not occurred, meaning many residents were denied the opportunity to comment properly.

In addition, more than 100 supporting documents were released after the consultation period had already begun. This made it extremely difficult for residents to review the information and respond effectively. This lack of fair and transparent process is, in itself, sufficient reason to reject MM411.

---

3. Legal Concerns

Environmental Assessment Requirements
There is a legal obligation for the Council to assess all reasonable alternatives before selecting sites for development. However, no detailed, site-specific assessment of SES30 appears in the relevant environmental reports. This means the Council cannot demonstrate that this is the least harmful option, as required.

This is inconsistent with the Council's claim that brownfield sites were prioritised before considering Green Belt land.

Duty to Cooperate
The Duty to Cooperate requires meaningful collaboration with neighbouring authorities. There is little evidence that Sheffield City Council has properly engaged with nearby councils, particularly Rotherham, to explore alternative housing solutions across boundaries. This suggests the requirement has not been adequately fulfilled.

Ecology and Wildlife Protection
No surveys for protected species were carried out before the site was proposed for allocation. This raises serious concerns regarding compliance with wildlife legislation. The relevant assessments do not clearly show that protected habitats or species will not be affected.

Furthermore, the removal of requirements for soil surveys weakens environmental safeguards at a crucial stage.

Flood Risk Considerations
Recent flood risk assessments indicate that flooding is a genuine issue on this site. Natural water features and historic mine workings add to the complexity.

National planning policy requires proper application of the Sequential Test before allocating land at risk of flooding. There is insufficient evidence that this has been carried out, making the proposal questionable in legal terms.

---

4. Failure to Meet Soundness Criteria

Not Positively Prepared
While additional housing is needed, this does not justify the release of Green Belt land without fully considering less harmful alternatives. There is no clear evidence this has been done.

Handsworth is being asked to accommodate a disproportionate share of development, with over 40% of the city's Green Belt housing concentrated in one area. No clear reasoning has been provided for this imbalance.

Not Justified
There are inconsistencies in the Council's own findings regarding archaeology. Earlier evidence highlights potential significant remains, while later documents minimise or omit these concerns. This raises doubts about the reliability of the site's assessment.

Not Deliverable (Not Effective)
There are multiple practical issues affecting delivery:

Access depends heavily on Beaver Hill Road, which already raises safety concerns

Heritage features, including the Quaker burial ground, have not been fully assessed

Environmental constraints, including nearby ancient woodland, have not been adequately addressed

Loss of productive agricultural land has not been properly evaluated

Existing public use of the land will be lost without replacement provision

No clear or funded plan exists for necessary infrastructure such as roads, healthcare, and school places

Not Consistent with National Policy
The proposal conflicts with several elements of the National Planning Policy Framework, including those relating to Green Belt protection, biodiversity, heritage, flood risk, and open space.

It also falls short of the requirements for development on released Green Belt land, particularly in terms of affordable housing and infrastructure commitments.

---

5. Importance of the Site

The land at SES30 has historical significance, with evidence of long-term use dating back many centuries. It has formed part of the local landscape and community for generations.

The presence of the Cinder Hill Quaker Burial Ground further adds to its importance. As its significance is still under review, it is premature to allocate the site for development.

The fields are also widely used by local residents for recreation and exercise, functioning effectively as open space. Their loss would have a clear impact on the community.

---

6. Overestimation of Housing Capacity

The proposed figure of 827 homes does not appear realistic. Constraints such as archaeology, flooding, ecological buffers, and existing pathways reduce the area available for development.

These factors have not been fully reflected in the housing calculations, meaning the expected capacity is likely overstated.

---

7. Conclusion

This proposal suffers from serious procedural, legal, and practical flaws. It fails to meet the required tests of soundness and conflicts with national planning policy.

Key concerns include:

Lack of proper consultation

Conflicting and incomplete evidence

Failure to meet environmental and legal obligations

Absence of a clear infrastructure plan

Disproportionate impact on one area

Taken together, these issues demonstrate that the allocation is not justified or deliverable.

I therefore ask that the Inspectors remove SES30 from the Sheffield Local Plan and ensure that this land remains designated as Green Belt.

Mrl cPemberton

[redacted]

REF5.0371

Outlook

[Sheffield Local Plan] Main Modifications Response: Spatial Distribution of Green Belt sites

From [redacted]
Date Tue 2026-05-05 9:23 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>
Cc [redacted]

1 attachment (515 KB)
Spatial Distribution of Green Belt Sites.pdf;

[redacted]

Dear Local Plan Team,

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

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

Yours sincerely,

Gill Travis

On behalf of the Sheffield Green Belt Alliance

5 May 2026

Dear Inspectors,

Sheffield Plan Examination – Representation on Proposed Main Modifications. Spatial distribution of additional Green Belt release (MM10 Policy SP1; MM91 Table 2)

1. Summary

This representation concerns where the additional Green Belt release introduced through the Schedule of Proposed Main Modifications has been placed. MM10 (Policy SP1) names five strategic greenfield releases at Ecclesfield/Grenoside, Handsworth, Charnock, Lodge Moor and Chapeltown, with smaller releases at Oughtibridge, Wharncliffe Side and Dore. MM91 (Table 2) updates how housing supply is split between the city's sub-areas to reflect those releases.

The result is uneven: on the Council's additional allocations evidence, 79% of the additional Green Belt housing release falls into the Northeast, Chapeltown/High Green and Southeast sub-areas. All of the additional Green Belt employment release - some 67.35 hectares - falls into the same parts of the city. The Schedule does not show how the cumulative impacts on the environment, infrastructure and local communities have been assessed. The Council's own IIA Modifications Report Addendum admits that the cumulative effects of the additional allocations "need to be explored further".

A separate but related concern, set out in section 4, is that the same concentration of release falls in and around the parts of Sheffield that, on the Indices of Multiple Deprivation 2025, already experience the highest levels of deprivation. Two MPs gave oral evidence to the Examination on this point.

We are not opposed to meeting Sheffield's housing requirement. Our concern is whether the spatial pattern of Green Belt release introduced by the Main Modifications is justified and effective under NPPF (September 2023) paragraph 35, and consistent with paragraphs 11, 31 and 141. We do not think it is.

Our primary request is that the Inspectors find this distribution unsound, and ask for it to be reconsidered. If not, we ask that the cumulative effects identified by the Council's own IIA be assessed before the Plan is adopted.

2. Relevant evidence

- **Schedule of Proposed Main Modifications,** in particular MM10 (the reworded Policy SP1, naming the five strategic greenfield releases); MM11 (Policy SP2, the spatial approach); MM68 (Policy SA5, Southeast Sub-Area, increasing the housing target from about 1,640 to about 3,013 new homes); MM91 (Table 2, distribution of housing supply by sub-area); MM92 and MM93 (housing trajectory and five-year supply); and the additional site allocations listed below;

- **Council additional allocations evidence (2025),** showing the sub-area distribution of additional Green Belt housing release and the 67.35 hectares of additional Green Belt employment release;
- **IIA Update and Addendum (2026),** and the IIA Modifications Report Addendum (Sheffield City Council, February 2026), in particular p.120 (cumulative effects of additional site allocations) and the SA topics on which the modified Plan performs less well than the submitted Plan;
- **Indices of Multiple Deprivation 2025** for the pattern of deprivation in Sheffield;
- **EXAM 196:** oral evidence of Marie Tidball MP (Penistone and Stocksbridge) at the Stage 4 hearing of 2 October 2025;
- **EXAM 214:** oral evidence of Clive Betts MP (Sheffield South East) at the Stage 4 hearing of 15 October 2025.

Taken together, this material shows the following:

(a) MM10 (the reworded Policy SP1) names five strategic greenfield releases: Ecclesfield/Grenoside, Handsworth, Charnock, Lodge Moor and Chapeltown. It also identifies smaller releases at Oughtibridge, Wharncliffe Side and Dore. The named releases lean toward the north and east of the city.

(b) On the Council's additional allocations evidence, the additional Green Belt housing release is unevenly distributed across the sub-areas. The figures are set out in Table A below.

Sub-area	Additional GB housing capacity	Share
North West	172	4%
Northeast and Chapeltown/High Green	1,395	36%
Southeast	1,697	43%
South	304	8%
South West	338	9%
Total	**3,906**	**100%**

Table A: Additional Green Belt housing release by sub-area (Main Modifications, Feb 2026).

(c) For employment the pattern is starker. The Council's additional allocations evidence identifies 67.35 hectares of additional Green Belt employment release. All of it is in the Northeast/Chapeltown/High Green and Southeast sub-areas. None is in the North West, South or South West sub-areas.

(d) Combining housing and employment, about 95% of the additional Green Belt release introduced by the Main Modifications falls within the Northeast, Chapeltown/High Green and Southeast sub-areas. The site allocations follow the same pattern: NES36, NES37, NES38 and NES39 in the Northeast; CH03, CH04 and CH05 in

Chapeltown/High Green; NWS30 and NWS31 (in postcode S35, in the north of the city); SES29 and SES30 in the Southeast (Handsworth/SL1); and SS19 in the South.

(e) The IIA Update and Addendum (2026) shows that the modified Plan performs less well than the submitted Plan on several SA topics, including soil and land use, landscape and visual impacts, biodiversity, and transport and accessibility. Those negative effects are not spread evenly. They follow the location of the additional sites, and so fall on the same Northeast, Chapeltown/High Green and Southeast sub-areas in which the additional release is concentrated.

(f) The IIA Modifications Report Addendum (Sheffield City Council, February 2026) admits, at p.120, that the cumulative effects of the additional allocations have not yet been fully assessed:

"All changes to the site allocations have been considered in the appraisal of the 'modified version' of the Plan. Additional site allocations are likely to have cumulative effects on the IIA findings that need to be explored further. Changes to site conditions for all sites (existing and new site allocations) are also screened in to the assessment where appropriate."

(g) On the Indices of Multiple Deprivation 2025 [citation: IMD 2025], the most deprived neighbourhoods in Sheffield are clustered in the east, north-east and inner urban parts of the city. Areas in or near those clusters include Darnall, Burngreave, Manor and Wybourn, Arbourthorne, Gleadless Valley, Firth Park, Shiregreen, Brightside, Southey, and inner-city neighbourhoods including Highfield. The pattern is a connected cluster, not dispersed, as shown in Figure 1 below.

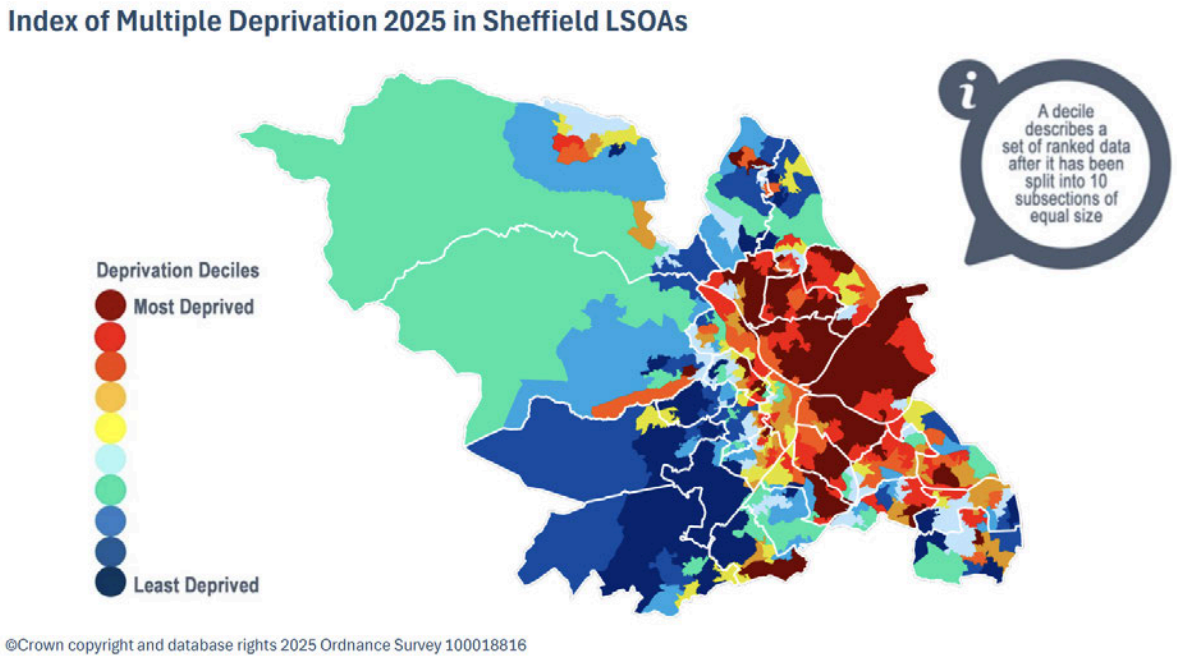


Figure 1: Index of Multiple Deprivation 2025 in Sheffield LSOAs. Source: Sheffield City Council, "Indices of Deprivation 2025 - Sheffield Summary" (November 2025). Reproduced under © Crown copyright and database rights 2025 Ordnance Survey 100018816.

(h) The site allocations and these deprived neighbourhoods sit close together. For example: NES37 is next to Shiregreen and Southey; NES38 is next to Fox Hill; SES29 and SES30 are next to the Handsworth and Darnall edges; SS19 is next to Gleadless Valley. Within one to three miles, the Manor, Arbourthorne, Burngreave and Firth Park communities lie close to the SES, NES and Chapeltown/High Green allocations.

(i) Two MPs gave oral evidence to the Examination on this point. Marie Tidball MP (Penistone and Stocksbridge), at the hearing on 2 October 2025 (EXAM 196), said:

"Nine out of the fourteen Green Belt release sites are in the Penistone and Stocksbridge constituency… comprising 41% of new housing and 60% of new employment land. From what I can see there is currently insufficient justification for that disproportionate allocation… We need to see a wider spread across all community areas, especially in the central urban area and along mass transit corridors."

Clive Betts MP (Sheffield South East), at the hearing on 15 October 2025 (EXAM 214), said:

"You can't have a plan… which is so biased that it puts the majority of the Green Belt sites… in the poorest, most deprived parts of the city, and exempts the most affluent parts of the city. That's not fair. … why then take away disproportionately the green open spaces from those communities and exempt development in the richer, more affluent parts of the city? It is fundamentally unfair and unjust."

3. Soundness concern - concentration and cumulative impact

NPPF (September 2023) paragraph 35 requires a plan to be justified, effective and consistent with national policy, on the basis of evidence that meets paragraph 31. Paragraph 141 says that, when releasing Green Belt land, plans should give first consideration to land that is well-served by public transport.

The figures in section 2 show a strongly concentrated pattern: about 87% of the additional Green Belt housing release and 100% of the additional Green Belt employment release falls into three of the nine sub-areas. The site-specific Main Modifications describe the suitability of each individual allocation. They do not address the prior question we are concerned with: whether the overall pattern is itself an appropriate strategy. The Schedule does not show why a more even distribution was rejected, nor how the cumulative effects of concentrating release into the same parts of the city have been assessed.

That gap is admitted by the Council's own evidence. The IIA Modifications Report Addendum (Sheffield City Council, February 2026, p.120) records that the additional site allocations "are likely to have cumulative effects on the IIA findings that need to be explored further." That work has not been carried out. The evidence does not yet show how that further exploration has been completed or how it has informed the final distribution of additional Green Belt release..

We therefore think the spatial distribution of additional Green Belt release is not justified under NPPF §35(b): the alternatives have not been tested, and the cumulative effects have not been assessed. It is also not effective under NPPF §35(c): there is no evidence that the chosen distribution can be delivered without overloading local roads, public transport, schools, healthcare, open space, drainage and biodiversity networks. The IIA itself shows that the modified Plan performs less well than the submitted Plan on soil and land use, landscape and visual impacts, biodiversity, and transport and accessibility - negative effects which fall on the same sub-areas where the additional release is concentrated.

4. A separate concern - alignment with deprivation

Section 3 sets out a soundness concern about the spatial distribution in its own terms, against the NPPF tests of justified and effective. There is also a separate concern. The same concentration of additional Green Belt release falls in and around the parts of Sheffield that, on the IMD 2025, already experience the highest levels of deprivation.

The IIA is meant to look at how the Plan affects different groups of people, including those who are already disadvantaged. It shows that the modified Plan performs less well than the submitted Plan on a number of SA topics that affect day-to-day life for communities close to large new developments - transport and accessibility, landscape and visual impacts, biodiversity, and soil and land use. The Schedule of Main Modifications does not bring those topic-level findings together with the deprivation pattern across the city to show that the chosen distribution does not make existing inequalities worse.

Two of the city's MPs made the same point in oral evidence. Both Tidball MP (EXAM 196) and Betts MP (EXAM 214) described the distribution as unfair between the more affluent and the more deprived parts of the city. We ask that the examination to look at whether the Council's evidence shows that the spatial pattern is acceptable, when read alongside where deprivation falls in the city.

On current evidence, we do not think it has been shown to be acceptable. The site-by-site evidence does not explain why the additional Green Belt release falls where it does, when set against the cumulative effect on communities that already experience higher deprivation. That is a soundness concern under NPPF §35(b), separately from the concern in section 3.

5. Primary request

We ask that the Inspectors find the spatial distribution of additional Green Belt release introduced by the Main Modifications unsound under NPPF (September 2023) paragraph 35, together with paragraphs 31 and 141. The distribution should be reconsidered. If the concerns at sections 3 and 4 cannot be resolved on the evidence currently available, the affected allocations should be deleted or their capacities reduced.

6. If the additional Green Belt release is kept

If the Inspectors decide to keep the additional Green Belt release at the overall scale proposed, we ask that the cumulative effects identified by the Council's own IIA be assessed before the Plan is adopted, and that the findings are reflected in the site allocations and conditions on development.

7. Consequential changes

If the Inspectors agree with either request at sections 5 or 6, the Council will need to make consequential changes to the Plan and its evidence base.

8. Conclusion

The Main Modifications introduce a new Green Belt release. On the Council's own additional allocations evidence, that pattern of release is highly concentrated: about 87% of the additional Green Belt housing release and 100% of the additional Green Belt employment release falls into three of the nine Sheffield Plan sub-areas - Northeast, Chapeltown/High Green and Southeast. The same concentration falls in and around the neighbourhoods which, on the IMD (2025), already experience the highest levels of deprivation.

The Schedule does not show how the cumulative impacts on the environment, infrastructure and local communities have been assessed. The Council's own IIA Modifications Report Addendum (February 2026, p.120) admits that the cumulative effects of the additional allocations "need to be explored further" - work that has not been carried out. On the evidence available, the spatial distribution of additional Green Belt release introduced by the Main Modifications is therefore not sound under NPPF (September 2023) paragraph 35, together with paragraphs 31 and 141.

The pattern should be reconsidered, or the cumulative effects identified by the Council's own IIA should be reassessed.

Yours faithfully,

Sheffield Green Belt Alliance

REF5.0372

Julie and Christopher Cooper
[redacted]

5 May 2026

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

FORMAL OBJECTION — SHEFFIELD LOCAL PLAN MAIN MODIFICATIONS MM410 (SES29) AND MM411 (SES30)

Representors: Julie and Christopher Cooper [redacted]

Residents since: Christopher — born and raised in Handsworth, resident for 47 years. Julie — 35 years. [redacted] have grown up here, [redacted]

Nature of Representation: Objection — both modifications are unsound and must be removed from the Plan.

Introduction

We live on [redacted] Handsworth — [redacted] immediately adjacent to the SES29 allocation at Handsworth Hall Farm, Finchwell Road. Of the two proposed S13 Green Belt sites, SES29 is our immediate neighbour. We will feel its impact more directly than almost anyone else in the city. We object in the strongest possible terms to both MM410 and MM411, and we ask the Inspectors to read this letter as the account of a family whose home, neighbourhood, and daily life would be permanently and irreversibly changed by these proposals.

The Urban Sprawl Has Already Gone Too Far

Handsworth is a distinct community. It has its own character, its own history, and its own identity — separate from Rotherham, separate from Waverley, separate from the industrial corridor that runs along the eastern edge of our area.

That identity is already under severe pressure. To the east of Handsworth, the Waverley development — built on the former Orgreave Colliery site — has grown into Yorkshire's largest brownfield mixed-use development, ultimately delivering up to 3,890 homes alongside the Advanced Manufacturing Park, which alone is planned to deliver 2.1 million square feet of commercial and industrial space. Waverley has expanded right up to the border of Handsworth. What was once open land between Sheffield and Rotherham is now a continuous built environment, and residents on the Waverley estate itself describe living 'at the top of the estate near Handsworth.'

'All this development is going to create a continuous urban sprawl and end the gap between Sheffield and Rotherham currently formed by fields and the M1. Handsworth / Orgreave / Waverley / Treeton / Brinsworth.' — SkyscraperCity forum, discussing the Waverley development.

That observation was made years ago. It has now largely come true. Waverley has built right up to our boundary. SES29 would place 870 new homes and 20 hectares of industrial and employment land directly on Handsworth Hall Farm — the last significant piece of open farmland between the Medlock estate and that sprawl. If SES29 proceeds, the gap disappears entirely. Handsworth, Waverley, and Rotherham become one continuous urban mass. The community we have lived in for decades ceases to exist as a distinct place. That is not an exaggeration. It is the logical consequence of this allocation.

Traffic and Emissions — Already at Crisis Point

Christopher works in Derby. He commutes by car. Getting out of Handsworth and onto the main road network is already one of the most stressful parts of his working day. The roads serving this area — Rotherham Road, Orgreave Road, Finchwell Road, Retford Road — are heavily congested during morning and evening peak hours. This has worsened significantly in recent years as Waverley has grown and thousands of new residents have been added to the same road network with inadequate infrastructure.

The opening of the new Lidl on Rotherham Road has compounded this further. Before the Lidl was approved, local residents formally objected, warning that Rotherham Road and Orgreave Road were ‘usually gridlocked during peak hours’ — this was documented in planning objections submitted to Sheffield City Council in 2021. Five personal injury collisions were recorded at the nearby Rotherham Road and Retford Road junction in the five years before approval, including two classified as serious. The Lidl was approved regardless. The congestion has worsened. Journey times have increased. And emissions on these roads — already elevated due to the volume of slow-moving and stationary traffic — have risen with them.

Our family has three vehicles between us. If the 870 homes proposed at SES29 generate even two vehicles per household on average, that is 1,740 additional cars joining roads that cannot cope with what is already on them.

The Sheffield Plan’s own documentation acknowledges that access to SES30 is ‘subject to further transport assessment’ — meaning safe access has not yet been demonstrated even for the smaller of the two S13 sites. For SES29, the combined traffic from 870 homes and 20 hectares of employment land — which will generate significant HGV and commercial vehicle movements in addition to residential traffic — has not been adequately assessed. This is the site immediately adjacent to our home. We know these roads. They cannot cope.

Children Walking to School

Our children grew up walking to school through this area. Children still do. The routes from the Medlock estate to local schools take them along roads that are already dangerous — pavements blocked by parked cars, junctions backed up with traffic, air quality poor from stationary engines. Adding hundreds of new homes on Handsworth Hall Farm, with all the additional traffic that brings, will make those routes more dangerous, not less. Increased vehicle movements mean increased emissions at pavement level — where children breathe — and increased risk at every crossing point. This is not a theoretical concern. It is a daily reality for families in this area that will be made significantly worse.

SES29 Specifically — What the Evidence Shows

As the residents closest to SES29, we wish to highlight the specific failings in the evidence base for this site:

- The site is a working farmland site — all 36.9 hectares is farmland, as confirmed by the Council's own site allocation data. This is not redundant or marginal land. It has been farmed for generations and forms part of the agricultural landscape that has defined this area.
- The site is within 250 metres of a historic landfill. The Sheffield Plan itself acknowledges this and states that an impact assessment would be necessary. No such assessment has been completed at allocation stage. The potential for contaminated land has been identified but not resolved.
- The Handsworth/Orgreave area sits above a former coal mining landscape. Orgreave Colliery operated from 1851 until 1981 with extensive underground workings across the wider area. No ground stability or mining risk assessment for SES29 has been completed before allocation.
- An ecology report prepared for the land warned that development on this scale would cause major habitat loss — including hedgerows, watercourses, a pond, and areas of woodland — and that it would be difficult to replace what is lost within the site itself. No protected species surveys were conducted before the site was allocated.
- The assumed housing yield of 870 homes does not account for the deductions required by these constraints. The plan is built on numbers that do not reflect the actual developable area.

Infrastructure Cannot Support This

A Freedom of Information request to the NHS has confirmed that GP surgeries in S13 are already at or beyond capacity. There is no confirmed, funded plan for how they will cope with thousands of additional residents. The Council's answer — that surgeries could be physically expanded — is not a plan. Anyone who has tried to get a GP appointment in this area recently will understand why that answer is not credible.

The same applies to schools, drainage, and every other piece of local infrastructure. This plan defers every difficult question to a future stage. It says 'we will work it out later.' That is not how sound planning works, and it is not what the NPPF requires.

Cumulative Pressure from Other Nearby Developments

The pressure on local infrastructure in S13 cannot be assessed in isolation. It is cumulative. The two Green Belt allocations must be considered alongside other recent and proposed developments in the immediate area that will add further demand on an already strained system.

The former Holme Lea social club site, 445 Handsworth Road. The Holme Lea social club closed in January 2017 and was subsequently demolished. Planning permission was granted in March 2017 for the erection of 27 apartments in a three-storey block with underground car parking on the site. That development has not yet been built, and the site remains empty. When those 27 apartments are eventually

developed — as the extant or any renewed permission will allow — they will bring additional residents and additional vehicles onto Handsworth Road, which is already a busy main bus route and arterial road. More importantly, every new household added to S13 places further demand on GP surgeries and primary care services that the FOI evidence already confirms are at or beyond capacity. Twenty-seven apartments may appear modest in isolation. In the context of 870 homes at SES29, 868 homes at SES30, and the ongoing growth of Waverley immediately to our east, they are another increment of pressure that the local healthcare and road infrastructure simply cannot absorb without a concrete, funded plan for expansion.

Land to the rear of Medlock Drive — unknown development intentions. We are also aware of land to the rear of Medlock Drive whose future development intentions have not been publicly confirmed or clearly communicated to residents. We do not know whether this land is the subject of any current or future planning application, allocation, or disposal. However, the absence of clarity is itself a concern. Any residential or commercial development on that land would add directly to the pressure on the same local roads, the same GP surgeries, and the same schools that are already identified in this objection as being at or beyond their limits. We would ask that the Inspectors and the Council give clear and transparent information to residents about the status of this land and ensure that any proposed development there is properly accounted for in the cumulative infrastructure assessment for the S13 area. Development that arrives piecemeal, without an overarching infrastructure plan, is exactly the pattern that has brought this area to its current breaking point. It must not continue.

Taken together — SES29, SES30, the Holme Lea apartments, the ongoing Waverley expansion, and any future development on land to the rear of Medlock Drive — the cumulative impact on Handsworth's road network, its GP practices, its schools, and its community character is substantial and has never been properly assessed as a whole. Sound planning requires that cumulative impact. It has not been provided.

Conclusion

We have lived in Handsworth for most of our lives. Christopher was born here. We raised our children here. We chose to stay here because this is our community — and a significant part of what makes it a community is the open farmland, the green fields, and the separation from the urban sprawl that has already consumed so much of the land to our east.

SES29 would destroy that separation permanently. It would complete the urban sprawl from Handsworth through Orgreave to Waverley and into Rotherham. It would place 870 homes and 20 hectares of employment land on contaminated, mined, and ecologically sensitive farmland immediately adjacent to the Medlock estate, without adequate transport, infrastructure, or environmental assessments. And it would do so on roads that are already at breaking point, with emissions already at dangerous levels, through a planning process that never properly engaged with the people most affected.

We formally request that the Inspectors:

- Decline to recommend MM410 and MM411 as sound and lawful Main Modifications;

- Require sites SES29 and SES30 to be removed from the Sheffield Local Plan; and
- Direct that both sites be retained within the Green Belt and protected from development.

Yours faithfully,

Julie Cooper Christopher Cooper

[redacted]

Sources

Waverley Development and Urban Sprawl

Harworth Group: 'Waverley' project page — confirms up to 3,890 homes on 740-acre former Orgreave Colliery site; Advanced Manufacturing Park planned for 2.1 million sq ft of commercial space. harworthgroup.com/projects/waverley/

Harworth Group: 'Waverley's Olive Lane to open' (February 2025) — confirms over 1,700 homes already built; AMP home to McLaren and Rolls Royce. harworthgroup.com

The Sheffield Star: 'Waverley — what residents think' (March 2026) — resident quoted as living 'at the top of the estate near Handsworth.' thestar.co.uk

SkyscraperCity Forum: Waverley New Town thread — forum member notes development will 'create a continuous urban sprawl and end the gap between Sheffield and Rotherham.' skyscrapercity.com

Traffic, Lidl, and Emissions

YorkshireLive: 'New Lidl store plans for Sheffield hit with objections over traffic gridlock fears' (February 2021) — documents resident objections stating Rotherham Road/Orgreave Lane/Retford Road are 'usually gridlocked during peak hours.' examinerlive.co.uk

The Sheffield Star: 'New Lidl set to open in Sheffield' (January 2022) — confirms five personal injury collisions at Rotherham Road/Retford Road junction in five years, including two serious. thestar.co.uk

Sheffield City Council, Sheffield Plan SES30 allocation — states access 'subject to further transport assessment.'

SES29 Site Constraints

Save S13 Green Belt: all 36.9ha of SES29 classified as farmland; ecology report warns of major habitat loss requiring off-site compensation. saves13greenbelt.org.uk/kier-starmer-farmland

Save Sheffield's Green Belt: confirms SES29 is within 250m of historic landfill; potential for contaminated land acknowledged in Sheffield Plan. saveSheffieldsgreenbelt.com

Durham Mining Museum — Orgreave Colliery, Handsworth: sunk 1851, closed 1981, extensive underground workings. dmm.org.uk

Healthcare and Infrastructure

Freedom of Information request to NHS South Yorkshire ICB re: GP capacity in S13 (2025–2026) — confirms surgeries at or beyond capacity, no funded expansion plan.

Sheffield City Council, IIA Update and Addendum (2026) — acknowledges negative effects on environment, health and wellbeing.

EXAM 127 / EXAM 127A / EXAM 130 — archaeological contradiction within Council's own evidence base for SES30.

Holme Lea and Local Development Context

CAMRA WhatPub / Sheffield & District Branch — confirms Holme Lea, 445 Handsworth Road, closed January 2017; planning permission approved March 2017 for demolition and erection of 27 apartments in a 3-storey block with underground car parking.

The Sheffield Star: 'This is what the mysterious tunnel found underneath Sheffield social club is' (March 2018) — reports tunnel discovery during demolition works, resident concerns about disruption to Handsworth Road. thestar.co.uk

Sheffield Forum / Save S13 community discussions — references to land to the rear of Medlock Drive and uncertainty over future development intentions.

REF5.0373

Outlook

RE: JUHS response to modifications to the draft Sheffield Plan - supplementary

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

1 attachment (178 KB)
JUHS draft Sheffield Plan response policies GS5 and GS6 December 2025 v2.pdf;

External email

Dear Sheffield Plan team

Further to our previous submission, I am again submitting our comments on the rewritten policies GS5 and GS6, as these are also in scope of the Main Modifications consultation (MM185 and MM186). Please note that as stated in the document our remarks also apply to policy GS9 (MM192).

Yours sincerely

Robin Hughes
Trustee, Joined Up Heritage Sheffield

From: [redacted]
Sent: 27 April 2026 08:38
To: 'sheffieldplan@sheffield.gov.uk' <sheffieldplan@sheffield.gov.uk>
[redacted]
Subject: JUHS response to modifications to the draft Sheffield Plan

Dear Sheffield Plan team

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

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

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

Yours sincerely

Robin Hughes

Trustee, Joined Up Heritage Sheffield

JUHS draft Sheffield Plan response policies GS5 and GS6
December 2025

Introduction

Joined Up Heritage Sheffield is a charity that seeks to bring together organisations and individuals interested in heritage, in all its variety, to promote better understanding, a strategic approach and a better-resourced and better-connected presentation of heritage. We have published a Heritage Strategy[1] that establishes a vision for Sheffield's heritage, which was adopted by Sheffield City Council in March 2024 and is now included in their work programme[2].

Following the publication of redrafted policies GS5 and GS6 this document gives our recommendation and reasoning for changes to the proposed policies. We would wish to participate in any further hearing on these policies.

Recommendation

Add the following as the first paragraph under the heading "Further Information" to both policies:

> Policy GS5/GS6 should be read in conjunction with the relevant policies as they relate to the conservation of historic waterways and waterpower infrastructure and their settings, including Policy BG1 (Blue and Green Infrastructure) and Policy D1 (Design Principles and Priorities) (in the Part 1 document) and Policy DE9 (Development and Heritage Assets) (in Part 2).

We believe that policies GS9, GS10 and GS11 also require this amendment, although these are not being consulted upon.

Sheffield's waterpower assets: significance and risk

Waterpower infrastructure and the role it played in enabling the development and growth of the metal trades and related industries are absolutely foundational for Sheffield and critical to our historic industrial identity. The Sheffield Waterways Strategy refers to "the globally significant mills, works, weirs and goits" and describes river valleys and their complex system of man-made infrastructure as a globally important place, worthy of UNESCO World Heritage Site status.[3]

Other sources concur, for example the River Loxley Heritage Statement which states that the importance of Hallamshire to the development of the ferrous metals industry, and in particular of the cutlery trade, is difficult to overstate; and that given this context, the wheels of the Loxley Valley must be seen to be of far more than local or regional significance: their importance is European, if not more widely international.[4] An overview of the significance of these heritage assets can be found in Historic England's South Yorkshire's Historic Water Management Assets in Relation to Water Framework Directive Requirements.[5]

---

[1] The Heritage Strategy can be found at https://www.joinedupheritagesheffield.org.uk/heritage-strategy.
[2] See resolution 11.2 of the Strategy & Resources Policy Committee meeting of 21st February 2024, available at https://democracy.sheffield.gov.uk/documents/g8786/Decisions%20Wednesday%2021-Feb-2024%2010.00%20Strategy%20and%20Resources%20Policy%20Committee.pdf?T=2.
[3] City of Rivers: Sheffield's Waterways Strategy (April 2014), p49, available at https://www.sheffield.gov.uk/planning-development/sheffield-waterways-strategy.
[4] River Loxley: Heritage Statement (Percival Turnbull, The Brigantia Archaeological Practice, 2012), p21, available at https://dcrt.org.uk/wp-content/uploads/2013/04/LOXLEY_WEIRS_STATEMENT.pdf.
[5] South Yorkshire's Historic Water Management Assets in Relation to Water Framework Directive Requirements (ECUS 2016), pp22-24, available at South Yorkshire's Historic Water Management Assets in Relation to Water Framework Directive Requirements | Historic England.

These assets are already under active threat from Great Yorkshire Rivers Partnership project on addressing barriers to fish migration, which has an ambition to "rid Yorkshire's rivers of all significant barriers" with a strong preference for total removal of weirs.[6] A historically important weir near Deepcar was recently bulldozed because existing planning policies were insufficient to protect it.

These fragile remaining waterpower heritage assets are as critical to the identity and character of Sheffield as are York's city walls or the bridges over the Tyne between Newcastle and Gateshead. By the Middle Ages the name of Sheffield was already synonymous with cutlery, and by the 18th century Sheffield was supplying to the world every type of edged tool and weapon. Waterpower assets in Sheffield track the rise of its characteristic industry over many centuries, standing out as being of great collective significance. Each individual asset makes an important contribution to that significance, even where they are fragmentary.

This collective special significance requires a bespoke city-wide approach to conservation which the planning system struggles to deliver. Only a handful of the more than one hundred waterpower sites in the city have any statutory protection, and this is often partial. It is therefore of the utmost importance that decision makers are guided to apply policies such as GS5 and GS6 in this context.

Response to Sheffield City Council's previous objections

At the Stage 3 hearing for Matter 23 Natural environment policies held on 16th October 2025 officers objected to our previous, more detailed proposals for changes. We now offer this simplified approach in response.

Officers stated that other policies provide strategic background which offers protection to waterpower heritage assets, and these are identified in CD25 Responses to Comments on Part 2 as BG1, D1 and DE9. Given that the Council's position is that these policies are relevant to the implementation of GS5 and GS6, it would be hard to understand any objection to making this relevance explicit.

Officers also stated that providing references to other relevant policies would add complexity. However, this has already been done for several other policies, both within and between policy groups. Examples include ES1 (refers to GS5, GS6, GS7, GS11), ES4 (refers to GS11), NC1 (refers to DE3, ES2, ES3, ES5, ES6, GS9, GS11 NC9 and NC11) and NC2 (refers to EC5 and NC5(c)). Our proposal is modelled on NC15, which in its Further Information section refers to BG1, GS1, GS6, DC1 and DE3.

Our proposal clarifies the relationship between policies in a way that will be helpful to decision makers and goes some way to meeting the very high level of concern expressed by heritage groups.

[6] See https://greatyorkshirerivers.org/.

REF5.0374

Outlook

ses30 MM441

From [redacted]
Date Tue 2026-05-05 9:36 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

FORMAL OBJECTION TO THE SHEFFIELD LOCAL PLAN
Main Modifications – Examination Stage
MM411 | SES30 – Land between Bramley Lane and Beaver Hill Road, Handsworth

Submitted by
Sopheana Cartledge

Address
[redacted]

Email
[Insert your email]

Modification Reference
MM411

Site Reference
SES30 – Land between Bramley Lane and Beaver Hill Road, Handsworth, S13

Submitted to
SheffieldPlan@sheffield.gov.uk

Deadline
5pm, Monday 14 April 2026

1. Introduction

I am submitting a formal objection to Main Modification MM411, which proposes allocating the SES30 site — the agricultural land between Bramley Lane and Beaver Hill Road in Handsworth — for approximately 827 homes, a secondary school, a multi-faith burial ground, and its removal from the Green Belt.

I live at [redacted] close to this land. These fields are not just undeveloped space; they are actively used every day by local residents for walking, exercise, and recreation. They are part of the character and identity of Handsworth.

However, my objection is not based solely on personal or community value. It is grounded in serious procedural flaws, inconsistencies in evidence, and failures to meet legal and planning policy

requirements. For these reasons, I respectfully request that SES30 is removed from the Local Plan and retained as Green Belt.

---

2. Improper Introduction as a Main Modification

SES30 was not included in the Local Plan at submission stage. Its introduction at the Main Modifications stage represents a substantial new proposal, not a minor amendment.

This site is significant in scale (36.55 hectares) and impact, yet it has not gone through the full consultation process required under the Town and Country Planning (Local Planning) (England) Regulations 2012. As a result, many local residents were denied a fair opportunity to respond at the appropriate stage.

Additionally, a large number of supporting documents were released after the consultation period had already begun. This made it extremely difficult for the public to engage meaningfully with the proposal. This procedural failure alone raises serious concerns about the legitimacy of the modification.

---

3. Legal and Regulatory Concerns

Environmental Assessment Requirements
There is no clear evidence that all reasonable alternative sites have been properly assessed. The required impact assessments do not provide a robust, site-specific justification for selecting SES30. This undermines compliance with environmental assessment regulations.

Duty to Cooperate
There is insufficient evidence that meaningful discussions have taken place with neighbouring authorities, particularly regarding cross-boundary housing needs. This raises concerns about compliance with statutory obligations.

Ecology and Wildlife Protection
No comprehensive protected species surveys appear to have been undertaken prior to allocation. Given legal obligations under wildlife legislation, this represents a significant oversight.

Flood Risk and Land Conditions
Available assessments indicate that flooding, natural water features, and historic mining activity may affect the site. There is no clear evidence that required flood risk tests have been fully and properly applied before proposing development.

---

4. Failure to Meet the Tests of Soundness

Not Positively Prepared
The allocation places a disproportionate burden on one area. A significant share of proposed Green Belt housing is concentrated in Handsworth, without sufficient justification or demonstration that less harmful alternatives have been exhausted.

Not Justified
The evidence base is inconsistent, particularly in relation to archaeological considerations. Earlier studies indicate potential constraints and the presence of historically significant features, while later documents appear to downplay these issues without clear justification.

Not Effective
There are serious uncertainties regarding deliverability:

- Transport access and road safety concerns remain unresolved
- Heritage assets within or near the site have not been fully assessed
- Ecological constraints and biodiversity requirements have not been clearly addressed
- No fully costed infrastructure plan is in place

Without clear solutions to these issues, the site cannot be considered deliverable within the plan period.

Not Consistent with National Policy
The proposal conflicts with multiple principles of national planning policy, including:

- Protection of Green Belt land unless exceptional circumstances are demonstrated
- Safeguarding high-quality agricultural land
- Protection of heritage assets and biodiversity
- Requirement to replace lost open space
- Need for adequate infrastructure and affordable housing provision

---

5. Character and Importance of the Site

This land has a long history of agricultural use and forms part of the wider landscape character of Handsworth. It provides open space that is widely used by the local community.

There are also indications of heritage interest within and around the site, including a historic burial ground and potential archaeological remains. These features require proper assessment before any development decisions are made.

The site functions as accessible open space in practice, even where not formally designated as such. Its loss would have a significant impact on the wellbeing of local residents.

---

6. Reliability of Housing Figures

The estimated capacity of 827 homes appears uncertain. Once constraints such as:

- archaeological areas
- environmental buffers
- flood-affected land
- existing landscape features

are properly accounted for, the actual developable area is likely to be significantly reduced.

This raises concerns about whether the projected housing numbers are realistic or achievable.

---

7. Conclusion

This objection highlights a number of serious issues with the proposed allocation of SES30, including:

- procedural shortcomings in how the site was introduced
- lack of compliance with legal and environmental requirements
- inconsistencies within the evidence base
- unresolved constraints affecting deliverability
- conflict with national planning policy

Taken together, these concerns indicate that the allocation is not justified, not deliverable, and not sound.

I therefore respectfully request that SES30 is removed from the Sheffield Local Plan and that the land remains protected as Green Belt.

Sopheana Cartledge
[redacted]

REF5.0375

Outlook

CHO3 Objection

From [redacted]
Date Tue 2026-05-05 9:39 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

1 attachment (1 MB)
CH03 Objection.pdf;

External email

Please see attached my objection to the disgraceful plans to decimate the greenbelt in S35.

Regards

Richard Nutbrown

Main Modifications Consultation– CH03 (Warren Lane)

Introduction

This representation is submitted as a formal objection to the proposed allocation of Site CH03, including the Main Modifications.

It is considered that the allocation is unsound when assessed against the tests of soundness set out in the National Planning Policy Framework (NPPF, December 2023), specifically that it is not justified, not effective, and not consistent with national policy (paragraph 35).

1. Green Belt Harm/ Spatial Strategy

The site is a high-scoring Green Belt parcel (score 17) and forms the Boundary preventing settlement coalescence Sheffield & Barnsley

CH03 cannot be assessed in isolation as it forms a cluster of allocations with CH04, CH05, NES36, NES37, NES38 & NES39. These proposed Greenbelt sites create a significant outward expansion of the settlement boundary and result in a continuous tract of Greenbelt loss

The Plan assesses these sites individually. However, the true planning impact is cumulative and spatial, resulting in urban extension from contained growth. This cumulative effect is materially greater than the sum of individual site impacts and has not been adequately assessed.

The Sheffield Plan clearly states that development will be focused on Brownfield land, existing urban areas and higher density development, but the allocation of CH03 demonstrates clear inconsistency with the stated spatial strategy. In practice, the plan is relying on Greenbelt release to meet housing requirements, rather than prioritising urban regeneration.

Figure 1: Settlement Separation and Green Belt Context



Figure 1 shows the enclosure of Residential Area (Green) within existing & proposed Industrial Development (Red).

The site lies on the boundary between Sheffield and Barnsley, with the administrative boundary passing through the site Green Boundary Line.

Figure 2: Settlement Separation and Green Belt Context (Appendix 1)



Development of this site would contribute to the coalescence of these settlements, eroding their separate identities. The images above demonstrate the role of the site in maintaining separation and openness.

Preventing settlement merging is a fundamental purpose of Green Belt policy (NPPF paragraph 140), and maintaining openness is a key characteristic (paragraph 139).

The release of this site from the Green Belt has not been robustly justified, particularly given the extent of constraints affecting deliverability. This conflicts with NPPF paragraph 143, which requires exceptional circumstances to be fully evidenced.

2. Landscape, Character and Visual Impacts (IIA Sustainability SA8/ SA9)

- The site is currently in agricultural use, and the tenant farmers rely on this field for Grazing and livestock feed, the loss of such land will affect the livelihoods of these tenant farmers.

- The open rural character of the site would be replaced with Industrial Units, altering long-established landscape separation and negatively affecting local amenity and the wider visual character of openness.

Compounding the above the topography of the site is elevated and even with the proposed Buffer Zones the proposed units would shadow the adjacent residences conflicting with NPPF paragraph 191.

3. Transport, Highways and Access Constraints

Please see Appendix 6 Traffic Report by 'Ian Taylor I.Eng MICE':

The Plan promotes reduced reliance on private vehicles, increased walking, cycling and public transport use and the creation of 20-minute neighbourhoods. However, site CH03 is located on the edge of the urban area, is less well connected to key services and employment areas and is likely to result in car dependent travel patterns. This is in direct contravention of the IIA and site selection around sustainable transport.

- **Sustainable Travel Modes:**
  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 steep incline and is on a busy road, making it unattractive to pedestrians. In view of the above it is unlikely that anyone would walk to the site.
  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.
  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.
  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.

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.**

This raise's concerns in relation to NPPF paragraph 111, which requires that development should not result in unacceptable impacts on highway safety or severe cumulative impacts on the road network

4. Flood Risk and Drainage Issues

Flood risk has been identified as a constraint requiring mitigation.

In the absence of clear and robust evidence demonstrating that flood risk can be appropriately managed, the allocation conflicts with NPPF paragraphs 158–175, which require development to avoid areas at risk of flooding and not increase flood risk elsewhere.

The cumulative impact of the cluster of developments must be considered in relation to flood risk. The surrounding areas, including Nether Lane, Chapeltown Road, Blackburn Brook and Ecclesfield Park, have already experienced flooding during periods of prolonged rainfall. Undertaking flood risk assessment on a site-by-site basis at planning application stage puts our community at significant risk of the cumulative impacts of the significant Greenbelt developments planned in elevated positions around the area.

The site's clay soils and sloping topography raise concerns about increased surface water runoff and downstream flood risk with the bottom of the site often being waterlogged.

5. Heritage and Setting of Listed Buildings

The site is located within an area of archaeological interest and was once part of the Historical Tankersly Deer Park (Warren). NPPF paragraphs 195–199 require heritage assets to be conserved in a manner appropriate to their significance. The absence of detailed archaeological investigation introduces further uncertainty and constraint on the developable area.

6. Ecological and Biodiversity Concerns

The Site Allocations Schedule demonstrates that development sites require Biological Net Gain, Ecological Mitigation and Protection of Environmental features, thereby confirming the selected sites have environmental value.

CH03 supports protected and priority/ protected species, including skylarks, bats, badgers, owls, Kestrels and a range of other birds and mammals.

Ancient hedgerows and wildlife corridors contribute to local ecological connectivity on CH03. Again, there is a specification that Hedgerows 'must be retained' as wildlife corridors where possible as part of the master planning of the site for and within subsequent planning applications, yet this has not been specified for this site with only vague reference to 'exploring' ecological corridors and 'where feasible' BNG delivered onsite.

No Biodiversity Net Gain strategy has been prepared, despite statutory requirements for 10% BNG and there is a lack of clear mitigation measures outlined for the loss of this undeveloped land and habitat.

Mitigation measures cannot fully replicate the ecological function of Green Belt land and Biodiversity Net Gain does not compensate for the loss of Green Belt openness or strategic green infrastructure, particularly when factoring in the significant amount of Greenbelt within such a small radius across the local community.

CH03 (Warren Lane) should not be built upon and should instead be removed from the Sheffield Plan because it consists almost entirely of Grade 2 agricultural land, classified as Best and Most Versatile (BMV), making it one of the highest quality and most productive land types in England. Under the National Planning Policy Framework (NPPF), significant weight should be given to the economic and other benefits of BMV agricultural land, and where development is necessary,

areas of poorer quality land should be preferred. CH03 directly conflicts with this principle, as it represents a high-value resource that would be permanently lost if developed. The evidence shows that a substantial proportion of the proposed Green Belt release already affects BMV land—at least 53%—meaning the inclusion of CH03 would further intensify this harm unnecessarily. In contrast, alternative sites within the plan consist largely of lower-quality, non-BMV land, demonstrating that less harmful options are available. Retaining CH03 in the plan therefore undermines compliance with national policy, weakens the sustainable use of land, and fails to justify the avoidable loss of one of Sheffield's most valuable agricultural assets!

Site	Housing Area	Gross Site Area (Ha)	Housing	Predictive ALC	Comments
CH03	Chapeltown & Ecclesfield	**18.06**		**Grade 2**	**BMV**

Key

Colour	ALC Class	Quality	BMV
Blue/cyan	Class 2	Very good	Yes
Dark green	Class 3a	Good	Yes
Light green	Class 3b	Moderate	No
Yellow	Class 4	Poor	No
Brown	Class 5	Very poor	No
Amber	NA	Not applicable	No

CH03 (Warren Lane)

BMV: almost all Grade 2, with a tiny amount of 3b in the west and NA in the north west.



7. Mining and Ground Contamination/ Stability Risks

Large portions of the site fall within a Coal Authority Development High Risk Area with known mine entries and shallow workings being present on site. In addition, the site is near a historic landfill site.

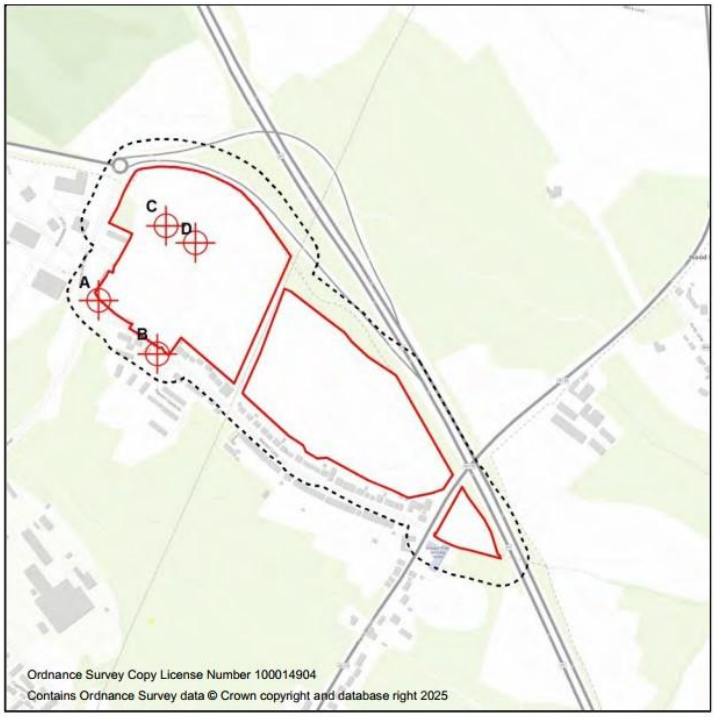
Figure 3: Mining Feature Plan (Appendix 3)

SITE LOCATION AND COAL MINING FEATURE PLAN

ADDRESS: Warren Lane, Tankersley, Sheffield, S35 2YD

SEARCH NUMBER: 473232

COAL SEARCH PLUS+
Protecting your investment



Ordnance Survey Copy License Number 100014904
Contains Ordnance Survey data © Crown copyright and database right 2025

KEY

Property Boundary

50m property boundary buffer

Coal mining subsidence claims within 50m (section 7)

Mine entries within 20m (section 5)

Adits

Shafts

Symbols are indicative only and are not drawn to scale.

World Topographic Map - Sources: Esri, HERE, Garmin, Intermap, Increment P Corp, GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, © OpenStreetMap contributors, and the GIS User Community

This plan shows the location of the subject property and where relevant the location of mine entries and subsidence claims referred to in the attached CoalSearchPlus+ regulated coal mining search report. The plan must be viewed in conjunction with the detailed findings in the attached report. A coal mining risk rating, including recommended further action where appropriate, is given at the conclusion of the report. (section 8)

This plan shows reportable features relevant to the property only. Additional relevant coal mining aspects are reported upon within the report. The report and content of this plan are specific to the property under consideration. The report contents should not be used in relation to other property in the area.

Coal Mining Constraints Plan

Figure 3: Coal Mining Constraints and No-Build Zones (Appendix 3)
The site is located within an area of historic mining activity and lies within proximity to a historic landfill.

These factors introduce risks relating to:

- Land instability
- Contamination
- Ground gas migration

The mining plan identifies shafts and exclusion zones which further restrict development potential and indicate that 'no build zones' are likely to be required.

Allocating the site without full investigation and resolution of these issues is inconsistent with NPPF paragraph 189, which requires land to be suitable for its intended use.

The presence of both of these near to any planned development could significantly affect the site viability and deliverability and remediation works on a site with mineshafts and voids raise significant safety concerns for nearby Residences and infrastructure, including the Tankersly Railway Tunnel and line.

The site raises serious environmental concerns. It is identified as potentially contaminated and lies within 250 metres of a historic landfill and historic mining activity. These factors introduce risks relating to land instability, contamination, and gas migration. The allocation of the site prior to full investigation and resolution of these issues is inconsistent with NPPF paragraph 189, which requires land to be suitable for its intended use, including safe ground conditions. This is further supported by Exam 148, which identifies potential land instability and "no build zones likely" (pages 5–6) Appendix 3.

EXAM 188 identifies CH03 as being within a Development High Risk Area, with approximately three recorded mine entries, surface mining activity affecting a significant portion of the site, and probable shallow coal workings across the site.
The Mining Remediation Authority advises that these features require detailed investigation, layout avoidance and are likely to require remediation. These constraints are site-wide and have direct implications for developable area and layout. There is no evidence that this has been reflected in the site's capacity assumptions, meaning deliverability remains uncertain

Buffer Constraints Plan (Appendix 1)
The plan illustrates the cumulative spatial impact of buffers, restrictions, and infrastructure constraints across the site. It demonstrates how developable land is significantly reduced when these factors are applied in combination.

8. Residential Amenity Impacts

The site lies near existing residential properties along Warren Lane and adjacent to Retirement & Care Homes.

The proposed B2 (general industrial) and B8 (storage and distribution) uses would be highly likely to generate noise, disturbance, lighting, and increased vehicle movements. These impacts would materially affect residents' ability to reasonably enjoy their homes.

To mitigate such impacts, a landscape buffer would be required. In practice, a buffer of at least 20–30 meters (and potentially greater for industrial uses) would be necessary. However, no minimum buffer width is specified.

The requirement for such buffers would significantly reduce the developable area of the site.

In addition, local residential properties are already located within approximately 200 meters of the M1 motorway, which carries very high traffic volumes. This creates an elevated baseline of environmental stress. Additional industrial development would compound these impacts, resulting in unacceptable cumulative effects.

This conflicts with NPPF paragraph 191, which requires planning decisions to avoid significant adverse impacts on health and quality of life.

9. Physical and Infrastructure Constraints

The site is affected by several major physical constraints:

- Northern Powergrid infrastructure and associated exclusion zones
- Overhead power lines requiring safety clearances
- The Tankersley Railway Tunnel running beneath part of the site
- Limited Access opportunities to Site

These constraints prevent built development across significant areas.

When combined with required buffers, access arrangements, and mitigation measures, the cumulative effect is a substantial reduction in usable land (Appendix 1)

10. Deliverability and Phasing Uncertainty

The first completions are only projected from 2035 on this site, offering little contribution to the five-year land supply. Other sites with significantly shorter lead in times and build out periods have been proposed and dismissed without clear justifiable reasons.

A 10-year build period would impose prolonged construction disruption on residents and local Care Homes, made worse by the cumulative impacts from other planned developments in the very local area.

The cumulative effect of the constraints identified reduces the developable area from approximately 18.2 hectares to around 11 hectares.

This represents a substantial reduction of approximately 40%, fundamentally undermining the site's viability and effectiveness as an employment allocation.

11. Conclusion

Site CH03 presents substantial unresolved issues relating to Green Belt harm, infrastructure capacity, road safety, landscape impact, biodiversity, heritage, drainage, and viability. We do not believe that the main modifications proposed for CH05 provide adequate compensation or mitigation for the irreversible and permanent damage that will result should this site be allocated for development. The IIA consistently shows that Greenfield / Green Belt sites perform worse environmentally, and Brownfield sites perform more favorably. Despite this, the Plan proceeds to allocate the site. This creates a clear and significant issue in that

the Plan selects sites that the IIA identifies as harmful, without adequately explaining why lower-impact alternatives have been rejected thereby undermining the 'justified' test of soundness as the evidence base does not support the chosen strategy.

For the reasons set out above, Site CH03 is not:

- Justified contrary to NPPF paragraph 35(a);
- Effective due to significant constraints reducing the developable area **(from approximately 18.2ha to circa 11ha – Appendix 1)**, contrary to NPPF paragraph 35(b);
- Consistent with national policy including paragraphs 111, 139–143, 158–175, 189 and 191.
- Demonstrably deliverable given the scale of unresolved constraints and risks to residential amenities
- It causes significant harm to Green Belt purposes and openness
- It contributes to cumulative urban expansion when considered with nearby sites
- It conflicts with the Plan's spatial strategy
- It is contrary to IIA findings, which identify environmental harm
- It is in a less sustainable, car-dependent location
- It is not supported by a robust case for exceptional circumstances

The extent and interaction of constraints fundamentally undermine the suitability of the site for allocation.

It is therefore respectfully requested that Site CH03 be removed from the plan.

REF5.0376

Outlook

SITE SES30

From [redacted]
Date Tue 2026-05-05 9:40 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

FORMAL OBJECTION TO THE SHEFFIELD LOCAL PLAN
Main Modifications – Examination Stage
MM411 | SES30 – Land between Bramley Lane and Beaver Hill Road, Handsworth

Submitted by
Mr Andrew Mellor

Address
[redacted]

Modification Reference
MM411

Site Reference
SES30 – Land between Bramley Lane and Beaver Hill Road, Handsworth, S13

Submitted to
SheffieldPlan@sheffield.gov.uk

Deadline
5pm, Monday 14 April 2026

1. Introduction

I am writing to formally object to Main Modification MM411, which proposes the allocation of the SES30 site — agricultural land between Bramley Lane and Beaver Hill Road in Handsworth — for a large-scale development including approximately 827 homes, a secondary school, and a multi-faith burial ground, alongside its removal from the Green Belt.

As a resident of [redacted] I am directly affected by this proposal. These fields are an established and valued part of the local environment, used daily by residents for walking, recreation, and access to nature. They contribute significantly to the character of the area.

My objection, however, is based not only on local impact but on wider concerns about the way this proposal has been brought forward, the adequacy of the supporting evidence, and its compliance with planning law and national policy. For these reasons, I request that the allocation is withdrawn.

2. Procedural Concerns

The inclusion of SES30 at the Main Modifications stage represents a fundamental change to the Local Plan. It is not a minor adjustment but a substantial new allocation involving a large area of land and significant development.

Because this site was not part of the original submission, it has not been subject to the same level of consultation required earlier in the plan-making process. This has limited the opportunity for meaningful public engagement.

Furthermore, key supporting documents were published after the consultation period had already begun, restricting the ability of residents to fully understand and respond to the proposal. This raises serious concerns about fairness and transparency.

---

3. Compliance with Legal Requirements

Assessment of Alternatives
There is insufficient evidence demonstrating that all reasonable alternative sites have been properly assessed before selecting SES30. Without this, it is not clear that this is the most appropriate or least harmful option.

Cross-Boundary Cooperation
The evidence provided does not clearly demonstrate effective collaboration with neighbouring authorities regarding housing needs. This is an important requirement in plan-making and appears inadequately addressed.

Ecological Considerations
The absence of detailed ecological surveys prior to allocation is a significant concern. Legal protections for wildlife and habitats require proper assessment before development decisions are made.

Flood Risk and Site Constraints
The site is known to contain natural water features and may be affected by historic land conditions. There is no clear demonstration that flood risk has been fully assessed in accordance with required policy tests.

---

4. Soundness of the Proposal

Positively Prepared
The allocation places a considerable share of development on one area without sufficient justification. There is limited evidence that alternative options have been exhausted before proposing the release of Green Belt land.

Justified
The supporting evidence lacks consistency, particularly regarding archaeological and environmental constraints. Earlier studies suggest potential limitations that are not clearly reflected in later assessments.

Effective
There are multiple uncertainties that affect whether the site can realistically be delivered:

- Access and transport arrangements are not yet resolved

- Potential heritage assets require further investigation
- Environmental and biodiversity requirements are not clearly addressed
- Infrastructure needs, including schools, roads, and healthcare, are not fully planned or funded

These issues call into question whether the development can be achieved within the plan period.

Consistent with National Policy
The proposal does not fully align with national planning principles, particularly in relation to:

- protection of Green Belt land
- safeguarding of high-quality agricultural land
- conservation of heritage and biodiversity
- provision of replacement open space
- ensuring sufficient infrastructure and affordable housing

---

5. Local Character and Community Value

The SES30 site forms an important part of the local landscape and has been used for generations as agricultural land. It also functions as an informal but well-used open space for the community.

The land supports everyday activities such as walking, exercise, and social interaction, contributing to the wellbeing of residents. Its loss would have a noticeable impact on the local environment and quality of life.

There are also indications of heritage significance within or near the site that have not yet been fully assessed. These should be properly understood before any decisions are made.

---

6. Housing Capacity Concerns

The projected figure of 827 homes appears uncertain when considering the range of constraints affecting the site. These include environmental features, potential heritage areas, and land that may not be suitable for development.

As these factors are taken into account, the actual capacity of the site may be significantly lower than currently estimated. This raises concerns about the reliability of the housing figures used to justify the allocation.

---

7. Conclusion

In summary, the proposed allocation of SES30 raises significant concerns in relation to process, evidence, and policy compliance. These include:

- the late introduction of the site without full consultation
- gaps in legal and environmental assessment
- inconsistencies within the supporting evidence

- unresolved issues affecting deliverability
- conflict with national planning policy

Taken together, these issues indicate that the proposal is not sound.

I therefore respectfully request that SES30 is removed from the Sheffield Local Plan and that the land remains designated as Green Belt.

Mr Andrew Mellor
[redacted]

REF5.0377

Outlook

site ses30

From [redacted]
Date Tue 2026-05-05 9:44 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

FORMAL OBJECTION TO THE SHEFFIELD LOCAL PLAN
Main Modifications – Examination Stage
MM411 | SES30 – Land between Bramley Lane and Beaver Hill Road, Handsworth

Submitted by
Miss Lauren Mellor

Address
[redacted]

Email
[Insert your email]

Modification Reference
MM411

Site Reference
SES30 – Land between Bramley Lane and Beaver Hill Road, Handsworth, S13

Submitted to
SheffieldPlan@sheffield.gov.uk

Deadline
5pm, Monday 14 April 2026

1. Introduction

I am writing to formally object to Main Modification MM411, which proposes allocating the SES30 site — the agricultural land located between Bramley Lane and Beaver Hill Road in Handsworth — for a major development of approximately 827 homes, along with a secondary school and a multi-faith burial ground. This proposal also involves removing the land from the Green Belt.

As a resident of [redacted] I am directly impacted by this proposal. The fields in question are an important part of the local environment and are used regularly by residents for walking, exercise, and recreation. They contribute to the openness and character of the area and are valued by the community.

My objection is not only based on local concerns but also on wider issues relating to how this proposal has been introduced, the strength of the supporting evidence, and whether it complies

with planning law and national policy. For these reasons, I believe the allocation should be withdrawn.

---

2. Concerns About the Process

The inclusion of SES30 at the Main Modifications stage represents a significant change to the Local Plan. It is not a minor amendment but a large-scale proposal that should have been subject to full public consultation at an earlier stage.

Because this site was not included in the original plan submission, residents have not had a fair or adequate opportunity to engage with the proposal. In addition, important supporting documents were released after the consultation period had already begun, making it difficult for the public to properly review and respond.

This raises concerns about transparency and whether the process has been conducted fairly.

---

3. Legal and Policy Issues

Consideration of Alternatives
There is limited evidence to show that other, less harmful sites have been fully considered before selecting SES30. Without this, it is unclear whether this is the most appropriate option.

Cooperation with Other Authorities
There is insufficient evidence demonstrating effective collaboration with neighbouring councils on housing needs. This is an important requirement and appears not to have been fully met.

Environmental and Ecological Factors
There is no clear indication that detailed ecological surveys have been carried out prior to the allocation of the site. This raises concerns about the potential impact on wildlife and habitats.

Flood Risk and Ground Conditions
The site includes natural water features and may be affected by historic land conditions. It is not clear that flood risk assessments and required planning tests have been properly completed before proposing development.

---

4. Soundness of the Allocation

Not Positively Prepared
The proposal places a significant amount of development in one area without clear justification. There is little evidence that alternative options have been fully explored before considering development on Green Belt land.

Not Justified
There are inconsistencies within the evidence base, particularly regarding environmental and archaeological constraints. Earlier information suggests potential limitations that are not fully reflected in later documents.

Not Effective
There are several unresolved issues that affect whether the site can realistically be delivered:

- Transport access and road safety concerns remain unclear

- Potential heritage features require further investigation
- Environmental requirements, including biodiversity, are not fully addressed
- Infrastructure such as roads, schools, and healthcare services is not clearly planned or funded

These uncertainties raise doubts about whether the development can be delivered successfully.

Not Consistent with National Policy
The proposal does not fully align with key national planning principles, including:

- protecting Green Belt land unless exceptional circumstances are proven
- safeguarding high-quality agricultural land
- protecting heritage and biodiversity
- ensuring replacement for lost open space
- providing adequate infrastructure and affordable housing

---

5. Importance of the Site to the Community

The SES30 site is an important part of the local landscape and has been used for agricultural purposes for many years. It also serves as an informal open space for the community.

Residents regularly use the land for walking, exercise, and outdoor activities. Its open nature contributes to the wellbeing of the community, and its loss would have a noticeable impact on the area.

There may also be heritage features within or near the site that have not yet been fully assessed. These should be properly understood before any development is considered.

---

6. Concerns About Housing Numbers

The estimate of 827 homes appears uncertain when taking into account the various constraints affecting the site. These may include environmental factors, land suitability, and areas that cannot be developed.

As these constraints are considered, the actual capacity of the site is likely to be lower. This raises concerns about whether the projected housing figures are realistic.

---

7. Conclusion

In conclusion, the proposed allocation of SES30 raises a number of serious concerns, including:

- the way the site has been introduced without full consultation
- gaps in environmental and legal assessments
- inconsistencies in the supporting evidence
- unresolved issues affecting deliverability

- conflict with national planning policy

Taken together, these issues suggest that the proposal is not sound.

I respectfully request that SES30 is removed from the Sheffield Local Plan and that the land remains protected as Green Belt.

Miss Lauren Mellor

[redacted]

Outlook

site MM441

From [redacted]
Date Tue 2026-05-05 9:48 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

FORMAL OBJECTION TO THE SHEFFIELD LOCAL PLAN
Main Modifications – Examination Stage
MM411 | SES30 – Land between Bramley Lane and Beaver Hill Road, Handsworth

Submitted by
Miss Lauren Mellor

Address
[redacted]

Email
[Insert your email]

Modification Reference
MM411

Site Reference
SES30 – Land between Bramley Lane and Beaver Hill Road, Handsworth, S13

Submitted to
SheffieldPlan@sheffield.gov.uk

Deadline
5pm, Monday 14 April 2026

1. Introduction

I am writing to formally object to Main Modification MM411, which proposes allocating the SES30 site — the agricultural land located between Bramley Lane and Beaver Hill Road in Handsworth — for a major development of approximately 827 homes, along with a secondary school and a multi-faith burial ground. This proposal also involves removing the land from the Green Belt.

As a resident of [redacted] I am directly impacted by this proposal. The fields in question are an important part of the local environment and are used regularly by residents for walking, exercise, and recreation. They contribute to the openness and character of the area and are valued by the community.

My objection is not only based on local concerns but also on wider issues relating to how this proposal has been introduced, the strength of the supporting evidence, and whether it complies

with planning law and national policy. For these reasons, I believe the allocation should be withdrawn.

---

2. Concerns About the Process

The inclusion of SES30 at the Main Modifications stage represents a significant change to the Local Plan. It is not a minor amendment but a large-scale proposal that should have been subject to full public consultation at an earlier stage.

Because this site was not included in the original plan submission, residents have not had a fair or adequate opportunity to engage with the proposal. In addition, important supporting documents were released after the consultation period had already begun, making it difficult for the public to properly review and respond.

This raises concerns about transparency and whether the process has been conducted fairly.

---

3. Legal and Policy Issues

Consideration of Alternatives
There is limited evidence to show that other, less harmful sites have been fully considered before selecting SES30. Without this, it is unclear whether this is the most appropriate option.

Cooperation with Other Authorities
There is insufficient evidence demonstrating effective collaboration with neighbouring councils on housing needs. This is an important requirement and appears not to have been fully met.

Environmental and Ecological Factors
There is no clear indication that detailed ecological surveys have been carried out prior to the allocation of the site. This raises concerns about the potential impact on wildlife and habitats.

Flood Risk and Ground Conditions
The site includes natural water features and may be affected by historic land conditions. It is not clear that flood risk assessments and required planning tests have been properly completed before proposing development.

---

4. Soundness of the Allocation

Not Positively Prepared
The proposal places a significant amount of development in one area without clear justification. There is little evidence that alternative options have been fully explored before considering development on Green Belt land.

Not Justified
There are inconsistencies within the evidence base, particularly regarding environmental and archaeological constraints. Earlier information suggests potential limitations that are not fully reflected in later documents.

Not Effective
There are several unresolved issues that affect whether the site can realistically be delivered:

- Transport access and road safety concerns remain unclear

- Potential heritage features require further investigation
- Environmental requirements, including biodiversity, are not fully addressed
- Infrastructure such as roads, schools, and healthcare services is not clearly planned or funded

These uncertainties raise doubts about whether the development can be delivered successfully.

Not Consistent with National Policy
The proposal does not fully align with key national planning principles, including:

- protecting Green Belt land unless exceptional circumstances are proven
- safeguarding high-quality agricultural land
- protecting heritage and biodiversity
- ensuring replacement for lost open space
- providing adequate infrastructure and affordable housing

---

5. Importance of the Site to the Community

The SES30 site is an important part of the local landscape and has been used for agricultural purposes for many years. It also serves as an informal open space for the community.

Residents regularly use the land for walking, exercise, and outdoor activities. Its open nature contributes to the wellbeing of the community, and its loss would have a noticeable impact on the area.

There may also be heritage features within or near the site that have not yet been fully assessed. These should be properly understood before any development is considered.

---

6. Concerns About Housing Numbers

The estimate of 827 homes appears uncertain when taking into account the various constraints affecting the site. These may include environmental factors, land suitability, and areas that cannot be developed.

As these constraints are considered, the actual capacity of the site is likely to be lower. This raises concerns about whether the projected housing figures are realistic.

---

7. Conclusion

In conclusion, the proposed allocation of SES30 raises a number of serious concerns, including:

- the way the site has been introduced without full consultation
- gaps in environmental and legal assessments
- inconsistencies in the supporting evidence
- unresolved issues affecting deliverability

- conflict with national planning policy

Taken together, these issues suggest that the proposal is not sound.

I respectfully request that SES30 is removed from the Sheffield Local Plan and that the land remains protected as Green Belt.

Miss Lauren Mellor
[redacted]

REF5.0378

Outlook

Objection CH03

From [redacted]
Date Tue 2026-05-05 9:47 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

1 attachment (1 MB)
CH03 Objection.pdf;

External email

Please see attached my objection to the Sheffield Plan.

Deb Newton-Nutbrown

Main Modifications Consultation– CH03 (Warren Lane)

Introduction

This representation is submitted as a formal objection to the proposed allocation of Site CH03, including the Main Modifications.

It is considered that the allocation is unsound when assessed against the tests of soundness set out in the National Planning Policy Framework (NPPF, December 2023), specifically that it is not justified, not effective, and not consistent with national policy (paragraph 35).

1. Green Belt Harm/ Spatial Strategy

The site is a high-scoring Green Belt parcel (score 17) and forms the Boundary preventing settlement coalescence Sheffield & Barnsley

CH03 cannot be assessed in isolation as it forms a cluster of allocations with CH04, CH05, NES36, NES37, NES38 & NES39. These proposed Greenbelt sites create a significant outward expansion of the settlement boundary and result in a continuous tract of Greenbelt loss

The Plan assesses these sites individually. However, the true planning impact is cumulative and spatial, resulting in urban extension from contained growth. This cumulative effect is materially greater than the sum of individual site impacts and has not been adequately assessed.

The Sheffield Plan clearly states that development will be focused on Brownfield land, existing urban areas and higher density development, but the allocation of CH03 demonstrates clear inconsistency with the stated spatial strategy. In practice, the plan is relying on Greenbelt release to meet housing requirements, rather than prioritising urban regeneration.

Figure 1: Settlement Separation and Green Belt Context



Figure 1 shows the enclosure of Residential Area (Green) within existing & proposed Industrial Development (Red).

The site lies on the boundary between Sheffield and Barnsley, with the administrative boundary passing through the site Green Boundary Line.

Figure 2: Settlement Separation and Green Belt Context (Appendix 1)



Development of this site would contribute to the coalescence of these settlements, eroding their separate identities. The images above demonstrate the role of the site in maintaining separation and openness.

Preventing settlement merging is a fundamental purpose of Green Belt policy (NPPF paragraph 140), and maintaining openness is a key characteristic (paragraph 139).

The release of this site from the Green Belt has not been robustly justified, particularly given the extent of constraints affecting deliverability. This conflicts with NPPF paragraph 143, which requires exceptional circumstances to be fully evidenced.

2. Landscape, Character and Visual Impacts (IIA Sustainability SA8/ SA9)

- The site is currently in agricultural use, and the tenant farmers rely on this field for Grazing and livestock feed, the loss of such land will affect the livelihoods of these tenant farmers.

- The open rural character of the site would be replaced with Industrial Units, altering long-established landscape separation and negatively affecting local amenity and the wider visual character of openness.

Compounding the above the topography of the site is elevated and even with the proposed Buffer Zones the proposed units would shadow the adjacent residences conflicting with NPPF paragraph 191.

3. Transport, Highways and Access Constraints

Please see Appendix 6 Traffic Report by 'Ian Taylor I.Eng MICE':

The Plan promotes reduced reliance on private vehicles, increased walking, cycling and public transport use and the creation of 20-minute neighbourhoods. However, site CH03 is located on the edge of the urban area, is less well connected to key services and employment areas and is likely to result in car dependent travel patterns. This is in direct contravention of the IIA and site selection around sustainable transport.

- **Sustainable Travel Modes:**
  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 steep incline and is on a busy road, making it unattractive to pedestrians. In view of the above it is unlikely that anyone would walk to the site.
  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.
  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.
  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.

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.**

This raise's concerns in relation to NPPF paragraph 111, which requires that development should not result in unacceptable impacts on highway safety or severe cumulative impacts on the road network

4. Flood Risk and Drainage Issues

Flood risk has been identified as a constraint requiring mitigation.

In the absence of clear and robust evidence demonstrating that flood risk can be appropriately managed, the allocation conflicts with NPPF paragraphs 158–175, which require development to avoid areas at risk of flooding and not increase flood risk elsewhere.

The cumulative impact of the cluster of developments must be considered in relation to flood risk. The surrounding areas, including Nether Lane, Chapeltown Road, Blackburn Brook and Ecclesfield Park, have already experienced flooding during periods of prolonged rainfall. Undertaking flood risk assessment on a site-by-site basis at planning application stage puts our community at significant risk of the cumulative impacts of the significant Greenbelt developments planned in elevated positions around the area.

The site's clay soils and sloping topography raise concerns about increased surface water runoff and downstream flood risk with the bottom of the site often being waterlogged.

5. Heritage and Setting of Listed Buildings

The site is located within an area of archaeological interest and was once part of the Historical Tankersly Deer Park (Warren). NPPF paragraphs 195–199 require heritage assets to be conserved in a manner appropriate to their significance. The absence of detailed archaeological investigation introduces further uncertainty and constraint on the developable area.

6. Ecological and Biodiversity Concerns

The Site Allocations Schedule demonstrates that development sites require Biological Net Gain, Ecological Mitigation and Protection of Environmental features, thereby confirming the selected sites have environmental value.

CH03 supports protected and priority/ protected species, including skylarks, bats, badgers, owls, Kestrels and a range of other birds and mammals.

Ancient hedgerows and wildlife corridors contribute to local ecological connectivity on CH03. Again, there is a specification that Hedgerows 'must be retained' as wildlife corridors where possible as part of the master planning of the site for and within subsequent planning applications, yet this has not been specified for this site with only vague reference to 'exploring' ecological corridors and 'where feasible' BNG delivered onsite.

No Biodiversity Net Gain strategy has been prepared, despite statutory requirements for 10% BNG and there is a lack of clear mitigation measures outlined for the loss of this undeveloped land and habitat.

Mitigation measures cannot fully replicate the ecological function of Green Belt land and Biodiversity Net Gain does not compensate for the loss of Green Belt openness or strategic green infrastructure, particularly when factoring in the significant amount of Greenbelt within such a small radius across the local community.

CH03 (Warren Lane) should not be built upon and should instead be removed from the Sheffield Plan because it consists almost entirely of Grade 2 agricultural land, classified as Best and Most Versatile (BMV), making it one of the highest quality and most productive land types in England. Under the National Planning Policy Framework (NPPF), significant weight should be given to the economic and other benefits of BMV agricultural land, and where development is necessary,

areas of poorer quality land should be preferred. CH03 directly conflicts with this principle, as it represents a high-value resource that would be permanently lost if developed. The evidence shows that a substantial proportion of the proposed Green Belt release already affects BMV land—at least 53%—meaning the inclusion of CH03 would further intensify this harm unnecessarily. In contrast, alternative sites within the plan consist largely of lower-quality, non-BMV land, demonstrating that less harmful options are available. Retaining CH03 in the plan therefore undermines compliance with national policy, weakens the sustainable use of land, and fails to justify the avoidable loss of one of Sheffield's most valuable agricultural assets!

Site	Housing Area	Gross Site Area (Ha)	Housing	Predictive ALC	Comments
CH03	Chapeltown & Ecclesfield	**18.06**		**Grade 2**	**BMV**

Key

Colour	ALC Class	Quality	BMV
Blue/cyan	Class 2	Very good	Yes
Dark green	Class 3a	Good	Yes
Light green	Class 3b	Moderate	No
Yellow	Class 4	Poor	No
Brown	Class 5	Very poor	No
Amber	NA	Not applicable	No

CH03 (Warren Lane)

BMV: almost all Grade 2, with a tiny amount of 3b in the west and NA in the north west.



7. Mining and Ground Contamination/ Stability Risks

Large portions of the site fall within a Coal Authority Development High Risk Area with known mine entries and shallow workings being present on site. In addition, the site is near a historic landfill site.

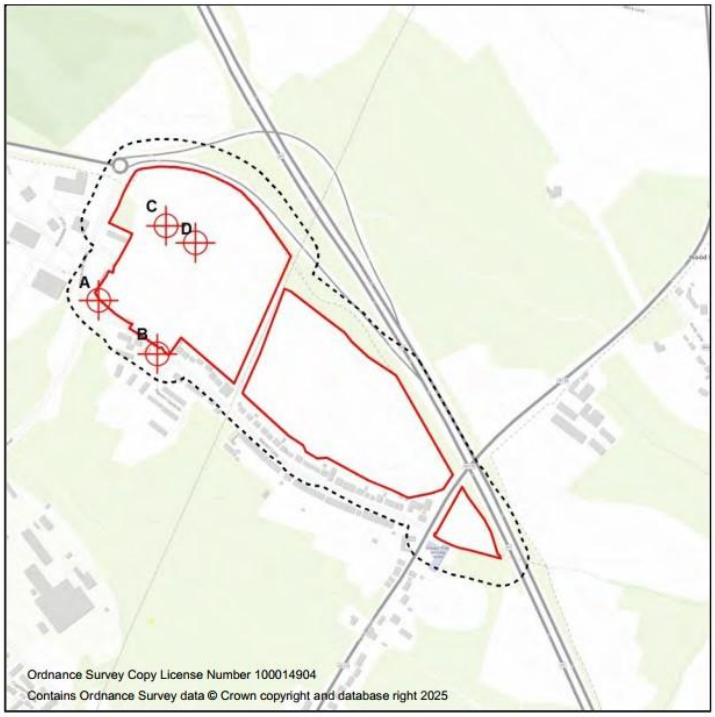
Figure 3: Mining Feature Plan (Appendix 3)

SITE LOCATION AND COAL MINING FEATURE PLAN

ADDRESS: Warren Lane, Tankersley, Sheffield, S35 2YD

SEARCH NUMBER: 473232

COAL SEARCH PLUS+
Protecting your investment



Ordnance Survey Copy License Number 100014904
Contains Ordnance Survey data © Crown copyright and database right 2025

KEY

Property Boundary

50m property boundary buffer

Coal mining subsidence claims within 50m (section 7)

Mine entries within 20m (section 5)

Adits

Shafts

Symbols are indicative only and are not drawn to scale.

World Topographic Map - Sources: Esri, HERE, Garmin, Intermap, Increment P Corp, GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, © OpenStreetMap contributors, and the GIS User Community

This plan shows the location of the subject property and where relevant the location of mine entries and subsidence claims referred to in the attached CoalSearchPlus+ regulated coal mining search report. The plan must be viewed in conjunction with the detailed findings in the attached report. A coal mining risk rating, including recommended further action where appropriate, is given at the conclusion of the report. (section 8)

This plan shows reportable features relevant to the property only. Additional relevant coal mining aspects are reported upon within the report. The report and content of this plan are specific to the property under consideration. The report contents should not be used in relation to other property in the area.

Coal Mining Constraints Plan

Figure 3: Coal Mining Constraints and No-Build Zones (Appendix 3)
The site is located within an area of historic mining activity and lies within proximity to a historic landfill.

These factors introduce risks relating to:

- Land instability
- Contamination
- Ground gas migration

The mining plan identifies shafts and exclusion zones which further restrict development potential and indicate that 'no build zones' are likely to be required.

Allocating the site without full investigation and resolution of these issues is inconsistent with NPPF paragraph 189, which requires land to be suitable for its intended use.

The presence of both of these near to any planned development could significantly affect the site viability and deliverability and remediation works on a site with mineshafts and voids raise significant safety concerns for nearby Residences and infrastructure, including the Tankersly Railway Tunnel and line.

The site raises serious environmental concerns. It is identified as potentially contaminated and lies within 250 metres of a historic landfill and historic mining activity. These factors introduce risks relating to land instability, contamination, and gas migration. The allocation of the site prior to full investigation and resolution of these issues is inconsistent with NPPF paragraph 189, which requires land to be suitable for its intended use, including safe ground conditions. This is further supported by Exam 148, which identifies potential land instability and "no build zones likely" (pages 5–6) Appendix 3.

EXAM 188 identifies CH03 as being within a Development High Risk Area, with approximately three recorded mine entries, surface mining activity affecting a significant portion of the site, and probable shallow coal workings across the site.
The Mining Remediation Authority advises that these features require detailed investigation, layout avoidance and are likely to require remediation. These constraints are site-wide and have direct implications for developable area and layout. There is no evidence that this has been reflected in the site's capacity assumptions, meaning deliverability remains uncertain

Buffer Constraints Plan (Appendix 1)
The plan illustrates the cumulative spatial impact of buffers, restrictions, and infrastructure constraints across the site. It demonstrates how developable land is significantly reduced when these factors are applied in combination.

8. Residential Amenity Impacts

The site lies near existing residential properties along Warren Lane and adjacent to Retirement & Care Homes.

The proposed B2 (general industrial) and B8 (storage and distribution) uses would be highly likely to generate noise, disturbance, lighting, and increased vehicle movements. These impacts would materially affect residents' ability to reasonably enjoy their homes.

To mitigate such impacts, a landscape buffer would be required. In practice, a buffer of at least 20–30 meters (and potentially greater for industrial uses) would be necessary. However, no minimum buffer width is specified.

The requirement for such buffers would significantly reduce the developable area of the site.

In addition, local residential properties are already located within approximately 200 meters of the M1 motorway, which carries very high traffic volumes. This creates an elevated baseline of environmental stress. Additional industrial development would compound these impacts, resulting in unacceptable cumulative effects.

This conflicts with NPPF paragraph 191, which requires planning decisions to avoid significant adverse impacts on health and quality of life.

9. Physical and Infrastructure Constraints

The site is affected by several major physical constraints:

- Northern Powergrid infrastructure and associated exclusion zones
- Overhead power lines requiring safety clearances
- The Tankersley Railway Tunnel running beneath part of the site
- Limited Access opportunities to Site

These constraints prevent built development across significant areas.

When combined with required buffers, access arrangements, and mitigation measures, the cumulative effect is a substantial reduction in usable land (Appendix 1)

10. Deliverability and Phasing Uncertainty

The first completions are only projected from 2035 on this site, offering little contribution to the five-year land supply. Other sites with significantly shorter lead in times and build out periods have been proposed and dismissed without clear justifiable reasons.

A 10-year build period would impose prolonged construction disruption on residents and local Care Homes, made worse by the cumulative impacts from other planned developments in the very local area.

The cumulative effect of the constraints identified reduces the developable area from approximately 18.2 hectares to around 11 hectares.

This represents a substantial reduction of approximately 40%, fundamentally undermining the site's viability and effectiveness as an employment allocation.

11. Conclusion

Site CH03 presents substantial unresolved issues relating to Green Belt harm, infrastructure capacity, road safety, landscape impact, biodiversity, heritage, drainage, and viability. We do not believe that the main modifications proposed for CH05 provide adequate compensation or mitigation for the irreversible and permanent damage that will result should this site be allocated for development. The IIA consistently shows that Greenfield / Green Belt sites perform worse environmentally, and Brownfield sites perform more favorably. Despite this, the Plan proceeds to allocate the site. This creates a clear and significant issue in that

the Plan selects sites that the IIA identifies as harmful, without adequately explaining why lower-impact alternatives have been rejected thereby undermining the 'justified' test of soundness as the evidence base does not support the chosen strategy.

For the reasons set out above, Site CH03 is not:

- Justified contrary to NPPF paragraph 35(a);
- Effective due to significant constraints reducing the developable area **(from approximately 18.2ha to circa 11ha – Appendix 1)**, contrary to NPPF paragraph 35(b);
- Consistent with national policy including paragraphs 111, 139–143, 158–175, 189 and 191.
- Demonstrably deliverable given the scale of unresolved constraints and risks to residential amenities
- It causes significant harm to Green Belt purposes and openness
- It contributes to cumulative urban expansion when considered with nearby sites
- It conflicts with the Plan's spatial strategy
- It is contrary to IIA findings, which identify environmental harm
- It is in a less sustainable, car-dependent location
- It is not supported by a robust case for exceptional circumstances

The extent and interaction of constraints fundamentally undermine the suitability of the site for allocation.

It is therefore respectfully requested that Site CH03 be removed from the plan.

REF5.0379

Outlook

ses30

From [redacted]
Date Tue 2026-05-05 9:54 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

FORMAL OBJECTION TO THE SHEFFIELD LOCAL PLAN
Main Modifications – Examination Stage
MM411 | SES30 – Land between Bramley Lane and Beaver Hill Road, Handsworth

Submitted by Mr Jack Ellis
[redacted]

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

1. Introduction

I wish to formally object to Main Modification MM411, which proposes allocating site SES30 — the farmland situated between Bramley Lane and Beaver Hill Road in Handsworth — for a development of 827 homes, together with a secondary school, a multi-faith burial ground, and its removal from the Green Belt.

I live locally and, like many others in the area, regularly use these fields. They are widely used by residents for walking, exercise, and recreation. This land is not simply a site marked for development — it plays an active role in the daily lives of the community.

My objection is not solely based on the value of the land to residents. More importantly, the proposal is fundamentally flawed due to procedural errors, conflicting evidence, and failures to meet legal requirements. For these reasons, it should not proceed. I respectfully request that the Inspectors remove SES30 from the plan and retain it as Green Belt land.

2. Inappropriate Introduction as a Main Modification

SES30 was not included in the original plan submitted for examination. Its addition at the Main Modification stage is being treated as a minor amendment, when in reality it represents a significant and entirely new allocation.

Covering 36.55 hectares and including substantial development, it should have been subject to full consultation under Regulations 18 and 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This has not occurred, meaning many residents were denied the opportunity to comment properly.

In addition, more than 100 supporting documents were released after the consultation period had already begun. This made it extremely difficult for residents to review the information and respond effectively. This lack of fair and transparent process is, in itself, sufficient reason to reject MM411.

---

3. Legal Concerns

Environmental Assessment Requirements
There is a legal obligation for the Council to assess all reasonable alternatives before selecting sites for development. However, no detailed, site-specific assessment of SES30 appears in the relevant environmental reports. This means the Council cannot demonstrate that this is the least harmful option, as required.

This is inconsistent with the Council's claim that brownfield sites were prioritised before considering Green Belt land.

Duty to Cooperate
The Duty to Cooperate requires meaningful collaboration with neighbouring authorities. There is little evidence that Sheffield City Council has properly engaged with nearby councils, particularly Rotherham, to explore alternative housing solutions across boundaries. This suggests the requirement has not been adequately fulfilled.

Ecology and Wildlife Protection
No surveys for protected species were carried out before the site was proposed for allocation. This raises serious concerns regarding compliance with wildlife legislation. The relevant assessments do not clearly show that protected habitats or species will not be affected.

Furthermore, the removal of requirements for soil surveys weakens environmental safeguards at a crucial stage.

Flood Risk Considerations
Recent flood risk assessments indicate that flooding is a genuine issue on this site. Natural water features and historic mine workings add to the complexity.

National planning policy requires proper application of the Sequential Test before allocating land at risk of flooding. There is insufficient evidence that this has been carried out, making the proposal questionable in legal terms.

---

4. Failure to Meet Soundness Criteria

Not Positively Prepared
While additional housing is needed, this does not justify the release of Green Belt land without fully considering less harmful alternatives. There is no clear evidence this has been done.

Handsworth is being asked to accommodate a disproportionate share of development, with over 40% of the city's Green Belt housing concentrated in one area. No clear reasoning has been provided for this imbalance.

Not Justified
There are inconsistencies in the Council's own findings regarding archaeology. Earlier evidence highlights potential significant remains, while later documents minimise or omit these concerns. This raises doubts about the reliability of the site's assessment.

Not Deliverable (Not Effective)
There are multiple practical issues affecting delivery:

- Access depends heavily on Beaver Hill Road, which already raises safety concerns
- Heritage features, including the Quaker burial ground, have not been fully assessed
- Environmental constraints, including nearby ancient woodland, have not been adequately addressed
- Loss of productive agricultural land has not been properly evaluated
- Existing public use of the land will be lost without replacement provision
- No clear or funded plan exists for necessary infrastructure such as roads, healthcare, and school places

Not Consistent with National Policy
The proposal conflicts with several elements of the National Planning Policy Framework, including those relating to Green Belt protection, biodiversity, heritage, flood risk, and open space.

It also falls short of the requirements for development on released Green Belt land, particularly in terms of affordable housing and infrastructure commitments.

---

5. Importance of the Site

The land at SES30 has historical significance, with evidence of long-term use dating back many centuries. It has formed part of the local landscape and community for generations.

The presence of the Cinder Hill Quaker Burial Ground further adds to its importance. As its significance is still under review, it is premature to allocate the site for development.

The fields are also widely used by local residents for recreation and exercise, functioning effectively as open space. Their loss would have a clear impact on the community.

---

6. Overestimation of Housing Capacity

The proposed figure of 827 homes does not appear realistic. Constraints such as archaeology, flooding, ecological buffers, and existing pathways reduce the area available for development.

These factors have not been fully reflected in the housing calculations, meaning the expected capacity is likely overstated.

---

7. Conclusion

This proposal suffers from serious procedural, legal, and practical flaws. It fails to meet the required tests of soundness and conflicts with national planning policy.

Key concerns include:

- Lack of proper consultation
- Conflicting and incomplete evidence
- Failure to meet environmental and legal obligations
- Absence of a clear infrastructure plan
- Disproportionate impact on one area

Taken together, these issues demonstrate that the allocation is not justified or deliverable.

I therefore ask that the Inspectors remove SES30 from the Sheffield Local Plan and ensure that this land remains designated as Green Belt.

Mr Jack Ellis



REF5.0380

Outlook

ses30

From [redacted]
Date Tue 2026-05-05 9:56 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

OBJECTION TO THE SHEFFIELD LOCAL PLAN – MAIN MODIFICATIONS
MM411 | Site SES30 – Land between Bramley Lane and Beaver Hill Road, Handsworth

Name: Mr Russell Mellor
Address: [redacted]

Reference: MM411
Site: SES30, Handsworth, S13
Submission: SheffieldPlan@sheffield.gov.uk
Deadline: 5pm, Monday 14 April 2026

Overview

I am writing to formally object to the inclusion of site SES30 within Main Modification MM411 of the Sheffield Local Plan. This proposal seeks to develop a large area of existing farmland for housing and associated infrastructure, while also removing it from the Green Belt.

This land is a well-used and valued part of the local area. It is regularly used by residents for recreation and forms part of the character and identity of Handsworth. However, my objection is not simply based on local attachment. There are significant concerns regarding how this proposal has been brought forward, the reliability of the supporting evidence, and whether it meets legal and planning requirements.

For these reasons, I strongly believe the site should not be allocated and should remain designated as Green Belt.

Procedural Issues

The introduction of SES30 at this stage in the process raises serious concerns. It was not included in the version of the Local Plan originally submitted for examination, yet it is now being presented as a modification rather than a major addition.

In reality, this is a substantial new allocation involving a large site and extensive development. As such, it should have gone through the full consultation process required by planning regulations. This has not happened, meaning many residents have not had a fair opportunity to comment.

Additionally, a significant number of supporting documents were released after the consultation had already begun. This limited the ability of residents to properly review and respond to the proposal. This lack of transparency undermines confidence in the process.

Compliance with Legal Requirements

There are several areas where the proposal appears not to meet legal obligations:

- **Assessment of Alternatives:** There is no clear evidence that all reasonable alternatives have been fully considered, particularly in relation to the use of brownfield land.
- **Duty to Cooperate:** It is not evident that sufficient collaboration has taken place with neighbouring authorities to explore options beyond Sheffield's boundaries.
- **Environmental Protection:** The absence of detailed ecological surveys raises concerns about potential impacts on wildlife and habitats.
- **Flood Risk:** Available evidence suggests that parts of the site are affected by flooding and other ground conditions, yet there is limited evidence that the required tests have been properly applied.

Taken together, these issues suggest that the proposal may not meet the necessary legal standards.

Concerns About Soundness

The proposal does not appear to satisfy the key tests required for a sound Local Plan:

- **Lack of justification:** There is insufficient evidence to show that developing this Green Belt site is necessary, particularly without fully exhausting less harmful alternatives.
- **Disproportionate impact:** A significant share of proposed Green Belt development is concentrated in Handsworth, without clear justification.
- **Conflicting evidence:** Reports relating to archaeology and site constraints are inconsistent, raising doubts about the reliability of the conclusions drawn.
- **Deliverability issues:** There are unresolved concerns regarding access, infrastructure, environmental constraints, and heritage considerations.

These factors collectively indicate that the site is not suitable for allocation.

Local Impact

The site plays an important role in the local area. It is used frequently by residents for walking, exercise, and leisure, effectively functioning as informal open space.

It also has historical and environmental value, including proximity to heritage features and natural habitats. The loss of this land would have a lasting impact on the character of the area and the wellbeing of the community.

Furthermore, no clear replacement for this open space has been identified.

Housing Capacity and Infrastructure

The proposed number of homes appears optimistic given the constraints affecting the site. Factors such as flood risk, ecological buffers, and existing features are likely to reduce the amount of land available for development.

There is also a lack of detail regarding how necessary infrastructure — including roads, schools, and healthcare — would be provided and funded. Without this, the proposal cannot be considered realistic or deliverable.

Final Comments

In summary, the inclusion of SES30 raises serious concerns in relation to process, evidence, legality, and practical delivery.

Key issues include:

- Inadequate consultation
- Unclear or inconsistent supporting evidence
- Potential failure to meet legal requirements
- Lack of infrastructure planning
- Significant local impact

Given these concerns, I respectfully request that this site is removed from the Sheffield Local Plan and that it remains protected as Green Belt land.

Mr Russell Mellor

[redacted]

REF5.0381

Outlook

site ses30

From [redacted]
Date Tue 2026-05-05 9:58 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

REPRESENTATION AGAINST MAIN MODIFICATION MM411
Sheffield Local Plan – Examination Stage
Site SES30: Land between Bramley Lane and Beaver Hill Road, Handsworth

Submitted by: Mr John Mellor
Address: [redacted]

Modification Reference: MM411
Site Reference: SES30 (Handsworth, S13)
Submission Email: SheffieldPlan@sheffield.gov.uk
Deadline: 5pm, Monday 14 April 2026

Statement of Objection

I am submitting this representation to oppose the proposed allocation of site SES30 under Main Modification MM411. The proposal involves large-scale residential development, associated infrastructure, and the removal of this land from the Green Belt.

This site currently forms part of an open, undeveloped landscape that contributes significantly to the character of the area. It is well-used by the local community and plays an important role in providing accessible green space. However, my objection is not based solely on these local considerations. There are wider concerns relating to process, evidence, and compliance with planning policy.

Concerns Regarding Process

The way in which this site has been introduced raises serious procedural concerns. It was not included in earlier stages of the Local Plan and has instead appeared as part of a later modification.

Given the scale and significance of the proposal, this approach is inappropriate. A development of this size should have been subject to full public consultation from the outset. The absence of this process has limited meaningful public engagement.

It is also concerning that a large volume of supporting material was published after consultation had already begun, restricting the ability of residents to fully understand and respond to the

proposal.

Policy and Legal Issues

There are several areas where the proposal appears to fall short of required standards:

- There is insufficient evidence to demonstrate that alternative sites, particularly previously developed land, have been properly considered.
- It is unclear whether adequate cooperation has taken place with neighbouring authorities to explore wider housing solutions.
- Environmental considerations, including impacts on wildlife and habitats, have not been fully assessed prior to allocation.
- Known flood risks and ground conditions have not been clearly addressed in line with national requirements.

These issues call into question whether the proposal meets the necessary legal and policy framework.

Suitability of the Site

There are significant doubts about whether this location is appropriate for the level of development proposed.

The site is subject to a range of constraints, including environmental sensitivities, potential heritage considerations, and infrastructure limitations. Access arrangements remain uncertain, and there is little clarity on how increased demand on local services would be managed.

In addition, concentrating a large proportion of development in one area risks placing an unfair burden on the local community without adequate justification.

Impact on the Local Area

The land in question is widely used for informal recreation and provides an important green space for nearby residents. Its loss would reduce opportunities for outdoor activity and negatively affect the character of the area.

There is no clear indication that equivalent or improved open space would be provided as part of the development.

The long-standing use and historical context of the land further strengthen the case for its protection.

Deliverability and Infrastructure

There are also concerns about whether the proposal is realistically deliverable.

The number of homes suggested does not appear to fully account for the site’s constraints. Furthermore, there is a lack of detail regarding how essential infrastructure — such as transport

improvements, healthcare provision, and education facilities — would be funded and delivered.

Without clear and credible plans in these areas, the proposal cannot be considered viable.

Conclusion

In light of the issues outlined above, I believe the proposed allocation of SES30 is not appropriate.

The key concerns relate to:

- The way the site has been introduced into the plan
- Gaps and inconsistencies in the supporting evidence
- Potential non-compliance with planning policy and legal requirements
- Uncertainty around infrastructure and delivery
- The negative impact on the local community and environment

For these reasons, I respectfully request that this site is removed from the Sheffield Local Plan and that its Green Belt status is retained.

Mr John Mellor
[redacted]

REF5.0382

Outlook

site ses30

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

External email

OBJECTION TO THE SHEFFIELD LOCAL PLAN – MAIN MODIFICATION MM411
Site SES30 – Land between Bramley Lane and Beaver Hill Road, Handsworth

Submitted by: Avarna Ellis
Address: [redacted]

Why I Don't Want This Land Built On

I live near these fields and I spend a lot of time there with my family. We go walking, play games, and enjoy being outside. Lots of other people do the same. It's one of the few places where we can go and just be in nature.

If houses are built here, that space will be gone forever. It won't just change things a little — it will completely take away a place that people use every day.

It Doesn't Feel Fair

It doesn't seem fair that such a big decision about this land has been made without everyone properly getting a say. From what I understand, this plan wasn't there at the start and has only been added later.

That means people haven't had the same chance to speak up about it. Big decisions like this should be open and clear so everyone can understand what's happening.

What About Nature?

There are animals, trees, and plants on this land. Even if you don't always see them, they are there. Building lots of houses could disturb or destroy their homes.

I've learned that some places in nature can't easily be replaced once they are gone. This feels like one of those places.

What About Flooding and Safety?

I've heard that parts of this land can flood and that there are problems under the ground from the past. That makes me wonder if it's really safe to build lots of homes here.

Also, more houses mean more cars, and that could make the roads busier and more dangerous.

Losing a Special Place

This isn't just empty land. It's somewhere people go to relax, walk their dogs, and spend time with family. Events and traditions happen here too.

If it gets built on, there isn't another place nearby that can replace it. Once it's gone, it's gone for good.

My Thoughts

I know houses are important, but I think they should be built in places where they cause less harm.

This land is important to the people who live here and to the environment. It doesn't feel like the right place for such a big development.

What I Would Like to Happen

I would like the people making this decision to think carefully about what will be lost.

Please don't build on this land. Please keep it as it is so people can continue to enjoy it now and in the future.

Avarna Ellis



REF5.0383

Outlook

siteses30

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

External email

REPRESENTATION OPPOSING MAIN MODIFICATION MM411
Sheffield Local Plan Examination
Site SES30 – Land between Bramley Lane and Beaver Hill Road, Handsworth

Submitted by: Gail Machen
Address: [redacted]

Modification Reference: MM411
Site Reference: SES30, Handsworth, S13
Submission Email: SheffieldPlan@sheffield.gov.uk

Introduction

I am submitting a formal objection to the proposed allocation of site SES30 under Main Modification MM411. This proposal would see a large area of existing Green Belt farmland developed for housing and supporting uses, including a school and burial ground.

This land is part of the everyday landscape for those living nearby. It is regularly used by local residents and contributes to the openness and identity of the area. However, my objection is not based purely on its local value. It is grounded in serious concerns about how this proposal has been introduced, the reliability of the evidence supporting it, and whether it complies with legal and planning requirements.

For these reasons, I believe the site should not be included in the Local Plan.

Procedural Concerns

The process by which SES30 has been brought forward is fundamentally flawed. It did not form part of the original plan submitted for examination and has instead been introduced later as a modification.

Given the size and impact of the proposed development, this is not a minor amendment but a major addition. As such, it should have been subject to full public consultation at the appropriate stages. This has not happened, meaning many affected residents have not had a fair opportunity to engage.

Furthermore, a significant number of supporting documents were made available only after the consultation period had begun. This has limited the ability of the public to properly review and respond to the proposal in an informed way.

Legal and Policy Issues

There are multiple areas where the proposal appears not to meet required standards:

- There is no clear demonstration that alternative sites have been adequately explored, particularly brownfield opportunities.
- It is unclear whether proper cooperation has taken place with neighbouring authorities to address housing needs beyond Sheffield's boundary.
- Environmental considerations, including impacts on wildlife, have not been sufficiently assessed before allocation.
- Flood risk and ground conditions present known challenges, yet there is little evidence that required national policy tests have been properly applied.

These concerns raise serious questions about the legality of the allocation.

Suitability and Constraints

The site is affected by a range of constraints that appear to have been underestimated or inconsistently reported.

Evidence relating to archaeology suggests the presence of potentially significant remains, yet this has not been fully evaluated. In addition, ecological sensitivities, proximity to ancient woodland, and the presence of natural water features all place limitations on development.

Access arrangements are also uncertain, with reliance on existing roads that already raise safety concerns.

Taken together, these factors suggest the site is not suitable for the scale of development proposed.

Impact on the Community

SES30 is not unused land. It is actively used by residents for walking, exercise, and leisure. It functions as informal open space and contributes to the wellbeing of the local community.

Its loss would represent a permanent reduction in accessible green space, with no clear alternative provision identified.

There is also a risk that concentrating a large amount of development in one area will place disproportionate pressure on local infrastructure and fundamentally alter the character of the area.

Deliverability and Infrastructure

There is insufficient clarity regarding how this development would be delivered in practice.

The number of homes proposed does not appear to fully account for the constraints affecting the site. At the same time, there is no detailed or funded plan for the infrastructure required to support such a development, including transport, education, healthcare, and drainage.

Without this information, the proposal cannot be considered realistic or achievable.

Conclusion

For the reasons outlined above, I believe the allocation of SES30 is not appropriate.

The proposal raises serious concerns regarding:

- The way it has been introduced into the plan
- Gaps and inconsistencies in the supporting evidence
- Compliance with legal and national policy requirements
- Practical deliverability and infrastructure provision
- The impact on the local community and environment

In light of these issues, I respectfully request that site SES30 is removed from the Sheffield Local Plan and that its Green Belt designation is retained.

Gail Machen
[redacted]

REF5.0384

Outlook

Sheffield Local Plan, Main Modifications: Save S13 Green Belt Representation

From [redacted]
Date Tue 2026-05-05 10:12 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>
Cc [redacted]

1 attachment (1 MB)
S13 Main Modifications Representation.pdf;

[redacted]

Dear Local Plan Team,

Please find attached a representation from Save S13 Green Belt: The Sapphire McCarthy Campaign on the Sheffield Plan Main Modifications consultation.

The representation concerns MM410 and MM411, and the cumulative impact of the proposed additional Green Belt allocations at SES29, Handsworth Hall Farm, and SES30, Bramley Common.

Please confirm receipt of this email and confirm that the attached document has been received and will be logged as a representation to the consultation.

Yours sincerely.

Save S13 Green Belt: The Sapphire McCarthy Campaign.

Representation on the Sheffield Plan Main Modifications Consultation

5 May 2026

Documents referenced
Schedule of Proposed Main Modifications (March 2026)
Integrated Impact Assessment (Update and Addendum, Feb 2026)
Integrated Impact Assessment Report Addendum: Modifications Consultation (2026)

Dear Inspectors,

1. Who we are and why we write

We are residents of S13 - the community that will live, every day, with the consequences of the additional Green Belt allocations now out for consultation. Many of us attended the Stage 4 hearings. Many thousands more across S13 have followed this examination through our MP, our local councillors, and our community organisations.

Our purpose is narrow: to show where the consultation documents now say one thing about MM410 (SES29) and MM411 (SES30), while the wider evidence before the examination says something else.

2. The concern, in short

The IIA carries over the assessment of SES29 and SES30 from earlier IIA work, without revisiting it against the further evidence that emerged during and after the Stage 4 hearings. The conditions on development in MM410 and MM411 push most major concerns to the planning application stage - flood risk mitigation, access feasibility, mining remediation, archaeology, and contamination. That is not how soundness is demonstrated.

The SEA Regulations require the IIA to identify, describe and evaluate the likely significant effects of the Plan and its reasonable alternatives. The NPPF requires the Plan to be positively prepared, justified, effective and consistent with national policy. We do not think the consultation documents yet meet those tests for S13.

The IIA itself acknowledges as much. Paragraph 5.2.2 of the IIA Modifications Report Addendum confirms that "what matters are the cumulative effects of the Plan, and so conclusions are drawn on the significance of effects 'as a whole'." Annex A of the same document concedes that **"additional**

site allocations are likely to have cumulative effects on the IIA findings that need to be explored further." That further exploration has not been published. The Council has set the test and identified the work needed to meet it. They have not done that work.

3. Strategic-level concerns

3.1 The concentration of growth in S13

South East Sheffield was already set to take 3,064 homes under the existing Plan. MM410 and MM411 add a further 1,697 on top of that - a 55% increase in housing in this single sub-area. Around 2,000 further homes are also coming forward at Waverley, across the road from SES29. For our community, that means approximately 3,500 new homes in a small area around Handsworth over the plan period.

How is this sustainable for our community? How has the IIA accounted for this level of growth? The IIA does not answer either question.

3.2 Cumulative impact

Section 3.2 is where the IIA's outstanding cumulative-effects work would be tested, if it were ever done. The IIA Addendum at paragraph 5.6.2 itself acknowledges that growth across the Green Belt sites in Handsworth "is likely to increase private vehicle and HGV movements… placing additional pressures on an already congested local highway network." That is the beginning of an assessment. It is not the conclusion of one. There is no single appraisal that puts SES29, SES30, the existing SES19-SES28 commitments, and the 3,890-home Waverley settlement just over the city boundary in Rotherham, onto one page and asks what their combined effect on S13 will be. Waverley shares our roads, our junctions, our schools, GP surgeries and dental practices, and the demands they place on local infrastructure. Administrative boundaries do not insulate residents from cumulative impact. The cross-boundary effect from Waverley alone deserves proper assessment. It has not had it.

3.3 Site selection and reasonable alternatives

Section 9 of the IIA Update and Addendum (February 2026) sets out the site selection process for the additional Green Belt allocations. The IIA Addendum at paragraph 4.2.10 groups SES29 and SES30 together as a single "Strategic Location 1 (Handsworth)". Paragraph 4.2.12 explains that other strategic locations were rejected because, on a mixed approach, sufficient available land was selected on more sustainable sites overall.

We disagree, and the Council's evidence points the same way. EXAM130A discounted GBOM01 partly on the basis that the Handsworth strategic location offered a stronger opportunity for "sustainable strategic growth" - but the SES29 and SES30 deliverability and constraint evidence (below) tells a different story. One Council-owned site (Ryecroft Farm) was rejected as "unavailable", while the Council's similar farmland at SES30 is to be made available by terminating an agricultural tenancy held since the early 1980s. No further Call for Sites was undertaken.[1] The SEA Regulations (12(2)) require this comparison to be set out openly. We do not think it yet is.

[1] The last Call for Sites was undertaken in the Christmas period of 2019-2020. A lot has changed since then.

3.4 Housing supply headroom

The IIA Update and Addendum (February 2026) records a supply of approximately 38,318 dwellings against a requirement of 38,012. That is a headroom of less than 1%. It has not been tested against the constraints and delivery questions set out below for SES29 and SES30. If those constraints reduce capacity, or if delivery on these sites is slower than assumed, the supply position falls below the requirement. The IIA does not show what happens in that scenario.

3.5 Housing delivery at SES30

The Council's stepped trajectory assumes a delivery rate of 150 homes a year for SES30. The IIA does not test this against evidence from comparable sites:

- the nearby Waverley development - around 4,000 homes when complete, across multiple housebuilders - delivers approximately 150 homes a year;
- Lichfield's "Start to Finish" research records a median delivery rate of 68 homes a year for sites of 500-999 homes;
- a comparable allocation CH05 was agreed at 60 homes a year;
- the landowner representation (Rep. 1.2042) originally anticipated approximately 100 homes a year for SES30.

Why should a single-developer site at SES30 deliver the same number of homes each year as the whole multi-developer Waverley scheme - an unconstrained, level, brownfield site? The IIA does not say. Nor does it say what would follow for plan effectiveness if SES30 delivers more slowly than assumed.

4. Site-specific concerns

4.1 MM410 - SES29, Handsworth Hall Farm

MM410 (SES29) describes a mixed-use allocation: 870 homes alongside 20 hectares of employment land. This is not a simple housing allocation. It is a large Green Belt release with several known constraints, a large employment component, and a significant relationship with the Sheffield Parkway. The Plan should not treat the stated housing and employment capacity as reliable until those matters have been tested.

Known constraints and developable area. The site-specific requirements for SES29 defer several important matters to the planning application stage. These include a Coal Mining Risk Assessment, a contaminated land assessment, an assessment of the impact of a historic landfill within 250 metres of the site, and provision of a Local Wildlife Site buffer. Each of these is an important constraint. They should have shaped the allocation and its assumed capacity, not been left to be resolved later.

The IIA's Flood Risk Sequential and Exception Test reports 3% of the site with a "high" surface water risk. It also identifies surface water flow routes and an unnamed watercourse running across the site.[2]

EXAM188, from the Mining Remediation Authority, records three mine entrances and Development High Risk Areas across significant parts of SES29.

Neither the allocation nor the IIA accounts for these constraints. Once the Local Wildlife Site buffer, watercourse, surface water routes, coal mining high-risk areas and historic landfill stand-off are allowed for, the developable area is significantly smaller than MM410 implies.

We ask the Inspectors to require the Council to explain what the realistic developable area of SES29 is, after all known constraints have been deducted.

Mixed-use layout and internal traffic conflict. The proposed 20 hectares of Class B2/B8 employment land is unusual: SES29 is the only additional Green Belt allocation in the Plan that combines a large housing allocation with a large industrial and warehousing component.

SES29 sits alongside the Sheffield Parkway, one of the most heavily trafficked roads in the city, notorious for some of the worst pollution in Sheffield. That creates a constraint for residential development. Housing should not be assumed to be appropriate at the Parkway end of the site because of traffic noise, air quality and residential amenity impacts.

The logical location for industrial or employment uses is therefore the Parkway side of the site, with housing further away from that road.

However, access to the site is from the opposite end, where the housing would need to be located. This creates a real internal conflict. If the employment or industrial units are placed at the Parkway end, but access is taken through the residential end, then traffic serving the employment uses - including commercial vehicles - would have to pass through or close to the housing area. This raises several concerns:

- conflict between residential amenity and employment traffic;
- noise, disturbance and air quality impacts for new residents;
- safety concerns from mixing residential streets with commercial vehicle movements;
- a risk that the site layout is driven by mitigation of Parkway impacts rather than by the need to create a good place to live;
- uncertainty over whether the site can deliver both housing and employment uses without conflict.

This matters because the IIA framework includes transport and accessibility, health, pollution, open space, land use and quality of the built environment as relevant sustainability considerations. SES29

[2] The IIA Sequential Test lists the site capacity at 770, not the 870 dwellings expected.

therefore requires more than a general statement that mixed-use development is acceptable in principle. It requires a clear explanation of how the internal layout will avoid routing employment traffic through the residential part of the site.

Ecology and Biodiversity Net Gain. The Biodiversity Net Gain assessment for SES29, EXAM157, was prepared in December 2023. By the time the Main Modifications are being considered, that ecological baseline is out of date and should not be relied on without review.

We are concerned that any desktop assessment based on older records will not capture more recent ecological data, including records added to the National Biodiversity Network database and records notified to the Council's Ecology Service.

The existing BNG assessment recognises Handsworth Beck and the stand of trees in the centre of the northern field, and notes the former extent of ancient woodland on or near the site. Further work is needed to assess:

- the ecological value of the hedgerows;
- the role of Handsworth Beck as a habitat corridor;
- the stand of trees in the northern field;
- the ecological influence of neighbouring land parcels outside the red line boundary;
- habitat connectivity across and beyond the site;
- whether more recent species records alter the baseline position;
- whether surveys undertaken in November missed species or habitat indicators visible earlier in the year.

If the ecological baseline is out of date, the assessment of site capacity, layout, mitigation and Biodiversity Net Gain is also uncertain.

The site's housing and employment capacity should not be treated as fixed until an updated ecological assessment has been carried out in the appropriate survey season.

Requested change. The Inspectors are asked to require the Council to demonstrate that SES29 can be planned so that:

1. the stated housing and employment capacity is realistic after all known constraints have been deducted;
2. housing is not exposed to unacceptable traffic noise, air quality or amenity impacts from the Parkway;
3. employment traffic can access the employment land without undermining residential amenity or safety;
4. the ecological baseline is updated before the allocation is finalised;
5. the updated ecological work considers hedgerows, Handsworth Beck, habitat connectivity, neighbouring land parcels and recent species records; and

6. the site capacity, layout, mix of uses and allocation boundary are reconsidered if the updated evidence shows that stronger buffers, lower capacity or different access arrangements are required.

If these matters cannot be demonstrated, the capacity, mix of uses, access arrangements or allocation boundary for SES29 should be reconsidered.

4.2 MM411 - SES30, Land between Bramley Lane and Beaver Hill Road

MM411 (SES30) describes an allocation with a total housing capacity of 827 homes alongside up to 5 hectares for a secondary school and up to 4 hectares for a multi-faith burial ground. The conditions on development direct that flood risk mitigation, mining remediation, and archaeology will all be addressed at or before planning application stage. In our view, this leaves soundness to be dealt with later, rather than demonstrating it now.

Site access and local road network. The IIA records active travel and public transport scores at a high level. It does not show how an 827-home site is to be entered and exited safely. There is one practical way in, off the steep Beaver Hill Road, and it crosses the no-development buffer recommended by the Level 2 SFRA. The Strategic Road Network assessment shows the Retford Road / Beaver Hill Road junction running at virtual maximum capacity (98%) by 2039, even with mitigation. None of this is addressed in the IIA's appraisal of SES30.

Flood risk. The IIA's site-level appraisal scored flood risk at SES30 as "minor positive", noting "no significant flood risk constraints". Those scores were prepared before the Level 2 SFRA. The IIA Update and Addendum (February 2026) acknowledges at paragraph 2.3.7 that the Level 2 SFRA has been "taken into account at strategy level" - but the SES30 site score itself has not been updated. The Level 2 SFRA, when it came, identified Flood Zones 2 and 3 on parts of the site; an "unknown" fluvial risk from an unmodelled on-site tributary; a recommended approximately 9.9% of the site (around 3.6 hectares) for flood storage; and an 8-metre no-development buffer either side of the watercourse. Climate change impacts remain unmodelled. No Sequential Test was undertaken for SES30 reflecting these findings.

Cumulative on-site constraints. Once you subtract the isolated northern parcel (around 5 hectares), the flood storage requirement (around 3.6 hectares), the 8-metre watercourse buffer, the 15-metre buffer to ancient woodland, the area of "major archaeological constraint" of approximately 3 hectares (EXAM127A), the Mining Remediation Authority's Development High Risk Areas (EXAM188), and the safeguarded land for the school (5 hectares) and burial ground (4 hectares), the developable area is significantly smaller than MM411 implies. We have done that arithmetic. The IIA has not.

Late evidence not reflected in the appraisal. Several reports relevant to SES30's soundness were produced after the decision to allocate. EXAM153 (the Ecological Appraisal) was issued in September 2025 and not published until October. EXAM175 (the Baseline Biodiversity Net Gain Assessment) suggests that registering SES30 as a biodiversity net gain site "may be a consideration instead of development". The Archaeological Scoping Assessment recommended evaluation before allocation.

The IIA Update and Addendum (February 2026) does not revisit the SES30 site score against any of these reports.

4.3 Site-specific exceptional circumstances

Both MM410 and MM411 record that the sites were "formerly designated as Green Belt" and that the National Planning Policy Framework "Golden Rules" apply. A site-specific assessment of harm to the Green Belt and the mitigation of that harm should have been carried out before exceptional circumstances can be established. The IIA records the rationale at strategic level only, and the Green Belt Release Topic Paper (EXAM 130) does not contain site-by-site assessments for SES29 and SES30, only inaccurate "suitability assessments" and superficial "planning appraisals". More detailed reports to show exceptional circumstances for both sites should, in our view, be provided.

5. What we ask

Our main request is straightforward: MM410 (SES29) and MM411 (SES30) should be deleted. The matters set out in sections 3 and 4 do not, in our view, describe an IIA that needs minor updating. They describe allocations whose developable area, delivery rate, cumulative impact and exceptional-circumstances case have not been demonstrated on the evidence now before the examination. They are not sound under the NPPF tests, and the gaps cannot be closed by further desk work alone. The community of S13 does not support these allocations, and we ask the Inspectors to recommend their removal from the Plan.

If the Inspectors decide not to recommend deletion, then at minimum - and while maintaining our objection - the consultation documents and any further IIA work carried out before the Plan is finalised should address the matters above. Specifically:

- that the IIA's appraisal of SES29 and SES30 is updated to take account of the Level 2 SFRAs, EXAM127A (archaeology), EXAM153 (ecology), EXAM157 and EXAM175 (biodiversity net gain), and EXAM188 (Mining Remediation Authority);
- that the developable area and housing capacity of each site is recalculated once the on-site constraints are subtracted - including, for SES29, the surface water routes, watercourse, Local Wildlife Site buffer, coal mining high-risk areas and historic landfill stand-off, and for SES30 the buffers to local wildlife sites and veteran trees, no-development areas, coal mining high-risk areas and areas of archaeological interest;
- that the assumed delivery rate of 150 homes a year for SES30 is justified against the evidence from comparable sites, or revised;
- that the Council provides a sensitivity analysis showing the effect on the supply position if capacity or delivery on the S13 sites comes in below assumption;
- that the Council provides a single cumulative impact assessment for S13, covering SES29, SES30, the existing SES19-SES28 commitments, the cross-boundary growth at Waverley and the 20 hectares of Class B2/B8 employment proposed at SES29;

- that site-specific exceptional circumstances assessments are provided for both SES29 and SES30; and
- that the Council explains clearly why alternative sites in Strategic Locations 3, 6 and 7 were considered less sustainable than the Handsworth strategic location, against the IIA framework.

We do not offer these steps as a substitute for our main request. Even if every one of them were undertaken, the cumulative impact of 1,697 additional homes in an area already absorbing more than 5,000 dwellings, on a constrained road network, against a sub-1% supply headroom, would remain unaddressed. The matters that drive the community's opposition - the loss of Green Belt at Handsworth, the concentration of growth in S13, and the deferral of major constraints to the planning application stage - cannot be fixed by further IIA work.

We ask the Inspectors to recommend that MM410 and MM411 are deleted, and to require the Council to find the homes the Plan needs without releasing this part of the Handsworth Green Belt and without the cumulative burden these allocations place on our community. We are the residents who will live with the effects of this Plan on S13 for its lifetime and beyond.

Yours faithfully,

Save S13 Green Belt: The Sapphire McCarthy Campaign

REF5.0385

Outlook

Local Plan

From [redacted]
Date Tue 2026-05-05 10:21 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[redacted]

We support the comments made in the submission made by the S35 Green Belt Action Group.

Christopher and Elizabeth Birkby
Sent from my iPad

REF5.0386

Outlook

CH03 Objection

From [redacted]
Date Tue 2026-05-05 10:28 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

1 attachment (1 MB)
CH03 Objection.pdf;

External email

Please find attached a detailed objection to the Sheffield Plan: Main Modifications Consultations - CH03 (Warren Lane).

Regards
Ms A Pink

Main Modifications Consultation– CH03 (Warren Lane)

Introduction

This representation is submitted as a formal objection to the proposed allocation of Site CH03, including the Main Modifications.

It is considered that the allocation is unsound when assessed against the tests of soundness set out in the National Planning Policy Framework (NPPF, December 2023), specifically that it is not justified, not effective, and not consistent with national policy (paragraph 35).

1. Green Belt Harm/ Spatial Strategy

The site is a high-scoring Green Belt parcel (score 17) and forms the Boundary preventing settlement coalescence Sheffield & Barnsley

CH03 cannot be assessed in isolation as it forms a cluster of allocations with CH04, CH05, NES36, NES37, NES38 & NES39. These proposed Greenbelt sites create a significant outward expansion of the settlement boundary and result in a continuous tract of Greenbelt loss

The Plan assesses these sites individually. However, the true planning impact is cumulative and spatial, resulting in urban extension from contained growth. This cumulative effect is materially greater than the sum of individual site impacts and has not been adequately assessed.

The Sheffield Plan clearly states that development will be focused on Brownfield land, existing urban areas and higher density development, but the allocation of CH03 demonstrates clear inconsistency with the stated spatial strategy. In practice, the plan is relying on Greenbelt release to meet housing requirements, rather than prioritising urban regeneration.

Figure 1: Settlement Separation and Green Belt Context



Figure 1 shows the enclosure of Residential Area (Green) within existing & proposed Industrial Development (Red).

The site lies on the boundary between Sheffield and Barnsley, with the administrative boundary passing through the site Green Boundary Line.

Figure 2: Settlement Separation and Green Belt Context (Appendix 1)



Development of this site would contribute to the coalescence of these settlements, eroding their separate identities. The images above demonstrate the role of the site in maintaining separation and openness.

Preventing settlement merging is a fundamental purpose of Green Belt policy (NPPF paragraph 140), and maintaining openness is a key characteristic (paragraph 139).

The release of this site from the Green Belt has not been robustly justified, particularly given the extent of constraints affecting deliverability. This conflicts with NPPF paragraph 143, which requires exceptional circumstances to be fully evidenced.

2. Landscape, Character and Visual Impacts (IIA Sustainability SA8/ SA9)

- The site is currently in agricultural use, and the tenant farmers rely on this field for Grazing and livestock feed, the loss of such land will affect the livelihoods of these tenant farmers.

- The open rural character of the site would be replaced with Industrial Units, altering long-established landscape separation and negatively affecting local amenity and the wider visual character of openness.

Compounding the above the topography of the site is elevated and even with the proposed Buffer Zones the proposed units would shadow the adjacent residences conflicting with NPPF paragraph 191.

3. Transport, Highways and Access Constraints

Please see Appendix 6 Traffic Report by 'Ian Taylor I.Eng MICE':

The Plan promotes reduced reliance on private vehicles, increased walking, cycling and public transport use and the creation of 20-minute neighbourhoods. However, site CH03 is located on the edge of the urban area, is less well connected to key services and employment areas and is likely to result in car dependent travel patterns. This is in direct contravention of the IIA and site selection around sustainable transport.

- **Sustainable Travel Modes:**
  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 steep incline and is on a busy road, making it unattractive to pedestrians. In view of the above it is unlikely that anyone would walk to the site.
  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.
  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.
  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.

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.**

This raise's concerns in relation to NPPF paragraph 111, which requires that development should not result in unacceptable impacts on highway safety or severe cumulative impacts on the road network

4. Flood Risk and Drainage Issues

Flood risk has been identified as a constraint requiring mitigation.

In the absence of clear and robust evidence demonstrating that flood risk can be appropriately managed, the allocation conflicts with NPPF paragraphs 158–175, which require development to avoid areas at risk of flooding and not increase flood risk elsewhere.

The cumulative impact of the cluster of developments must be considered in relation to flood risk. The surrounding areas, including Nether Lane, Chapeltown Road, Blackburn Brook and Ecclesfield Park, have already experienced flooding during periods of prolonged rainfall. Undertaking flood risk assessment on a site-by-site basis at planning application stage puts our community at significant risk of the cumulative impacts of the significant Greenbelt developments planned in elevated positions around the area.

The site's clay soils and sloping topography raise concerns about increased surface water runoff and downstream flood risk with the bottom of the site often being waterlogged.

5. Heritage and Setting of Listed Buildings

The site is located within an area of archaeological interest and was once part of the Historical Tankersly Deer Park (Warren). NPPF paragraphs 195–199 require heritage assets to be conserved in a manner appropriate to their significance. The absence of detailed archaeological investigation introduces further uncertainty and constraint on the developable area.

6. Ecological and Biodiversity Concerns

The Site Allocations Schedule demonstrates that development sites require Biological Net Gain, Ecological Mitigation and Protection of Environmental features, thereby confirming the selected sites have environmental value.

CH03 supports protected and priority/ protected species, including skylarks, bats, badgers, owls, Kestrels and a range of other birds and mammals.

Ancient hedgerows and wildlife corridors contribute to local ecological connectivity on CH03. Again, there is a specification that Hedgerows 'must be retained' as wildlife corridors where possible as part of the master planning of the site for and within subsequent planning applications, yet this has not been specified for this site with only vague reference to 'exploring' ecological corridors and 'where feasible' BNG delivered onsite.

No Biodiversity Net Gain strategy has been prepared, despite statutory requirements for 10% BNG and there is a lack of clear mitigation measures outlined for the loss of this undeveloped land and habitat.

Mitigation measures cannot fully replicate the ecological function of Green Belt land and Biodiversity Net Gain does not compensate for the loss of Green Belt openness or strategic green infrastructure, particularly when factoring in the significant amount of Greenbelt within such a small radius across the local community.

CH03 (Warren Lane) should not be built upon and should instead be removed from the Sheffield Plan because it consists almost entirely of Grade 2 agricultural land, classified as Best and Most Versatile (BMV), making it one of the highest quality and most productive land types in England. Under the National Planning Policy Framework (NPPF), significant weight should be given to the economic and other benefits of BMV agricultural land, and where development is necessary,

areas of poorer quality land should be preferred. CH03 directly conflicts with this principle, as it represents a high-value resource that would be permanently lost if developed. The evidence shows that a substantial proportion of the proposed Green Belt release already affects BMV land—at least 53%—meaning the inclusion of CH03 would further intensify this harm unnecessarily. In contrast, alternative sites within the plan consist largely of lower-quality, non-BMV land, demonstrating that less harmful options are available. Retaining CH03 in the plan therefore undermines compliance with national policy, weakens the sustainable use of land, and fails to justify the avoidable loss of one of Sheffield's most valuable agricultural assets!

Site	Housing Area	Gross Site Area (Ha)	Housing	Predictive ALC	Comments
CH03	Chapeltown & Ecclesfield	**18.06**		**Grade 2**	**BMV**

Key

Colour	ALC Class	Quality	BMV
Blue/cyan	Class 2	Very good	Yes
Dark green	Class 3a	Good	Yes
Light green	Class 3b	Moderate	No
Yellow	Class 4	Poor	No
Brown	Class 5	Very poor	No
Amber	NA	Not applicable	No

CH03 (Warren Lane)

BMV: almost all Grade 2, with a tiny amount of 3b in the west and NA in the north west.



7. Mining and Ground Contamination/ Stability Risks

Large portions of the site fall within a Coal Authority Development High Risk Area with known mine entries and shallow workings being present on site. In addition, the site is near a historic landfill site.

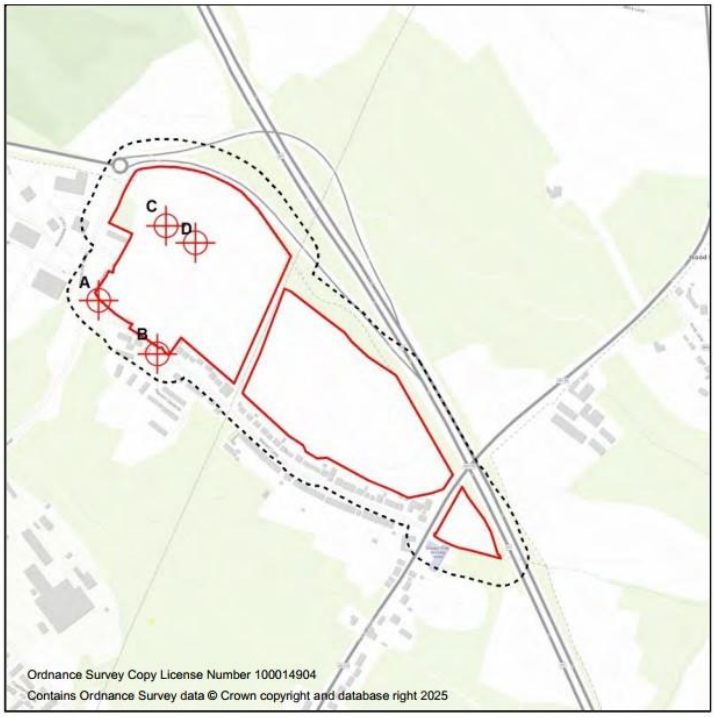
Figure 3: Mining Feature Plan (Appendix 3)

SITE LOCATION AND COAL MINING FEATURE PLAN

ADDRESS: Warren Lane, Tankersley, Sheffield, S35 2YD

SEARCH NUMBER: 473232

COAL SEARCH PLUS+
Protecting your investment



Ordnance Survey Copy License Number 100014904
Contains Ordnance Survey data © Crown copyright and database right 2025

KEY

Property Boundary

50m property boundary buffer

Coal mining subsidence claims within 50m (section 7)

Mine entries within 20m (section 5)

Adits

Shafts

Symbols are indicative only and are not drawn to scale.

World Topographic Map - Sources: Esri, HERE, Garmin, Intermap, Increment P Corp, GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, © OpenStreetMap contributors, and the GIS User Community

This plan shows the location of the subject property and where relevant the location of mine entries and subsidence claims referred to in the attached CoalSearchPlus+ regulated coal mining search report. The plan must be viewed in conjunction with the detailed findings in the attached report. A coal mining risk rating, including recommended further action where appropriate, is given at the conclusion of the report. (section 8)

This plan shows reportable features relevant to the property only. Additional relevant coal mining aspects are reported upon within the report. The report and content of this plan are specific to the property under consideration. The report contents should not be used in relation to other property in the area.

Coal Mining Constraints Plan

Figure 3: Coal Mining Constraints and No-Build Zones (Appendix 3)
The site is located within an area of historic mining activity and lies within proximity to a historic landfill.

These factors introduce risks relating to:

- Land instability
- Contamination
- Ground gas migration

The mining plan identifies shafts and exclusion zones which further restrict development potential and indicate that 'no build zones' are likely to be required.

Allocating the site without full investigation and resolution of these issues is inconsistent with NPPF paragraph 189, which requires land to be suitable for its intended use.

The presence of both of these near to any planned development could significantly affect the site viability and deliverability and remediation works on a site with mineshafts and voids raise significant safety concerns for nearby Residences and infrastructure, including the Tankersly Railway Tunnel and line.

The site raises serious environmental concerns. It is identified as potentially contaminated and lies within 250 metres of a historic landfill and historic mining activity. These factors introduce risks relating to land instability, contamination, and gas migration. The allocation of the site prior to full investigation and resolution of these issues is inconsistent with NPPF paragraph 189, which requires land to be suitable for its intended use, including safe ground conditions. This is further supported by Exam 148, which identifies potential land instability and "no build zones likely" (pages 5–6) Appendix 3.

EXAM 188 identifies CH03 as being within a Development High Risk Area, with approximately three recorded mine entries, surface mining activity affecting a significant portion of the site, and probable shallow coal workings across the site.
The Mining Remediation Authority advises that these features require detailed investigation, layout avoidance and are likely to require remediation. These constraints are site-wide and have direct implications for developable area and layout. There is no evidence that this has been reflected in the site's capacity assumptions, meaning deliverability remains uncertain

Buffer Constraints Plan (Appendix 1)
The plan illustrates the cumulative spatial impact of buffers, restrictions, and infrastructure constraints across the site. It demonstrates how developable land is significantly reduced when these factors are applied in combination.

8. Residential Amenity Impacts

The site lies near existing residential properties along Warren Lane and adjacent to Retirement & Care Homes.

The proposed B2 (general industrial) and B8 (storage and distribution) uses would be highly likely to generate noise, disturbance, lighting, and increased vehicle movements. These impacts would materially affect residents' ability to reasonably enjoy their homes.

To mitigate such impacts, a landscape buffer would be required. In practice, a buffer of at least 20–30 meters (and potentially greater for industrial uses) would be necessary. However, no minimum buffer width is specified.

The requirement for such buffers would significantly reduce the developable area of the site.

In addition, local residential properties are already located within approximately 200 meters of the M1 motorway, which carries very high traffic volumes. This creates an elevated baseline of environmental stress. Additional industrial development would compound these impacts, resulting in unacceptable cumulative effects.

This conflicts with NPPF paragraph 191, which requires planning decisions to avoid significant adverse impacts on health and quality of life.

9. Physical and Infrastructure Constraints

The site is affected by several major physical constraints:

- Northern Powergrid infrastructure and associated exclusion zones
- Overhead power lines requiring safety clearances
- The Tankersley Railway Tunnel running beneath part of the site
- Limited Access opportunities to Site

These constraints prevent built development across significant areas.

When combined with required buffers, access arrangements, and mitigation measures, the cumulative effect is a substantial reduction in usable land (Appendix 1)

10. Deliverability and Phasing Uncertainty

The first completions are only projected from 2035 on this site, offering little contribution to the five-year land supply. Other sites with significantly shorter lead in times and build out periods have been proposed and dismissed without clear justifiable reasons.

A 10-year build period would impose prolonged construction disruption on residents and local Care Homes, made worse by the cumulative impacts from other planned developments in the very local area.

The cumulative effect of the constraints identified reduces the developable area from approximately 18.2 hectares to around 11 hectares.

This represents a substantial reduction of approximately 40%, fundamentally undermining the site's viability and effectiveness as an employment allocation.

11. Conclusion

Site CH03 presents substantial unresolved issues relating to Green Belt harm, infrastructure capacity, road safety, landscape impact, biodiversity, heritage, drainage, and viability. We do not believe that the main modifications proposed for CH05 provide adequate compensation or mitigation for the irreversible and permanent damage that will result should this site be allocated for development. The IIA consistently shows that Greenfield / Green Belt sites perform worse environmentally, and Brownfield sites perform more favorably. Despite this, the Plan proceeds to allocate the site. This creates a clear and significant issue in that

the Plan selects sites that the IIA identifies as harmful, without adequately explaining why lower-impact alternatives have been rejected thereby undermining the 'justified' test of soundness as the evidence base does not support the chosen strategy.

For the reasons set out above, Site CH03 is not:

- Justified contrary to NPPF paragraph 35(a);
- Effective due to significant constraints reducing the developable area **(from approximately 18.2ha to circa 11ha – Appendix 1)**, contrary to NPPF paragraph 35(b);
- Consistent with national policy including paragraphs 111, 139–143, 158–175, 189 and 191.
- Demonstrably deliverable given the scale of unresolved constraints and risks to residential amenities
- It causes significant harm to Green Belt purposes and openness
- It contributes to cumulative urban expansion when considered with nearby sites
- It conflicts with the Plan's spatial strategy
- It is contrary to IIA findings, which identify environmental harm
- It is in a less sustainable, car-dependent location
- It is not supported by a robust case for exceptional circumstances

The extent and interaction of constraints fundamentally undermine the suitability of the site for allocation.

It is therefore respectfully requested that Site CH03 be removed from the plan.

REF5.0387

Outlook

Sheffield Plan (Main Modifications) - NHSPS Response

From [redacted]
Date Tue 2026-05-05 10:33 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

1 attachment (150 KB)
2026.04.14 Sheffield LP MM - NHSPS Response.pdf;

[redacted]

Good morning,

Thank you for the opportunity to respond to the Sheffield Plan - Main Modification consultation.

Attached is the response submitted by NHS Property Services (NHSPS) in relation to **Policy NC13**.

It would be greatly appreciated if you are able to confirm receipt of our response.

Should you have any questions, please do not hesitate to get in touch.

Kind regards
Hyacynth

Hyacynth Cabiles MRTPI | Town Planner

NHS Property Services Ltd

[redacted]

[redacted]

NHS Property Services

Strategic Planning Team
Planning Services
5th Floor, Howden House
Sheffield
S1 2SH
sheffieldplan@sheffield.gov.uk

[redacted]

05 May 2026

BY EMAIL ONLY

RE: Consultation on Sheffield Plan – Main Modification

Thank you for the opportunity to comment on the above document. The following representations are submitted by NHS Property Services (NHSPS).

NHS Property Services

NHS Property Services (NHSPS) manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable and modern healthcare environments. We partner with local NHS Integrated Care Boards (ICBs) and wider NHS organisations to help them plan and manage their estates to unlock greater value and ensure every patient can get the care they need in the right place and space for them. NHSPS is part of the NHS and is wholly owned by the Department of Health and Social Care (DHSC) – all surplus funds are reinvested directly into the NHS to tackle the biggest estates challenges including space utilisation, quality, and access with the core objective to enable excellent patient care.

General Comments on Health Infrastructure to Support Housing Growth

The delivery of new and improved healthcare infrastructure is significantly resource intensive. Health provision is also an integral component of sustainable development as access to essential healthcare services promotes good health outcomes and supports the overall social and economic wellbeing of an area. Given health infrastructure's strategic importance to supporting housing growth and sustainable development, it should be considered at the forefront of priorities for infrastructure delivery. The ability to continually review the healthcare estate, optimise land use, and deliver health services from modern facilities is crucial. The health estate must be supported to develop, modernise, or be protected in line with integrated NHS strategies. Planning policies should enable the delivery of essential healthcare infrastructure and be prepared in consultation with the NHS to ensure they help deliver estate transformation.

Draft Policy NC13: Safeguarding Local Services and Community Facilities

Draft Policy NC13 focuses on the protection of valued community facilities and would require demonstration of either one of criterion (a) to (d) to justify the loss of a valued community facility. Changes to the supporting paragraph of this policy are proposed under Main Modification Reference

MM145 – Para 4.45 (now renumbered to 4.50) which is intended to provide clarity on the application of the policy.

As currently drafted, the changes under MM145 would create a lack of clarity on the required criterion under Policy NC13 with regard to the loss of a valued community facility. Within the policy, the criterion can be interpreted as being different options which can be demonstrated by the applicant/a proposal and would not necessitate demonstration of all criteria in progressive succession. The proposed changes to the supporting paragraph under ref. MM145 would suggest otherwise and can be interpreted as all criteria would need to be demonstrated progressively.

As set out in our responses at Regulation 19 (February 2023) and Examination stage (August 2024), we reiterate our concerns around the lack of clarity around the inclusion of health facilities within the definition of 'valued community facilities'. In addition to the proposed changes above, this would leave the policy open to interpretation and to also potentially include health facilities within the definition and would include health facilities in the requirements to demonstrate all criterion, as the proposed changes would suggest.

Where healthcare facilities are included within the Local's Plan definition of community facilities, policies aimed at preventing the loss or change of use of community facilities and assets can potentially have a harmful impact on the NHS's ability to ensure the delivery of essential facilities and services for the community, particularly with the proposed main modification ref. MM145.

The NHS requires flexibility with regards to the use of its estate to deliver its core objective of enabling excellent patient care and support key healthcare strategies such as the NHS Long Term Plan. In particular, the disposal of sites and properties which are redundant or no longer suitable for healthcare for best value (open market value) is a critical component in helping to fund new or improved services within a local area. Requiring NHS disposal sites to explore the potential for alternative community uses, provide commuted sums, or to retain a substantial proportion of community facility provision adds unjustified delay to vital reinvestment in facilities and services for the community.

All NHS land disposals must follow a rigorous process to ensure that levels of healthcare service provision in the locality of disposals are maintained or enhanced, and proceeds from land sales are re-invested in the provision of healthcare services locally and nationally. The decision about whether a property is surplus to NHS requirements is made by local health commissioners and NHS England. Sites can only be disposed of once the operational health requirement has ceased. This does not mean that the healthcare services are no longer needed in the area, rather it means that there are alternative provisions that are being invested in to modernise services.

Where it can therefore be demonstrated that health facilities are surplus to requirements or will be changed as part of wider NHS estate reorganisation and service transformation programmes, it should be accepted that a facility is neither needed nor viable for its current use, and policies within the Local Plan should support the principle of alternative uses for NHS sites with no requirement for retention of a community facility use on the land. For the avoidance of doubt in the interpretation of the policy and clarity in the interpretation of the policy, the proposed modifications set out below (in *red italics*) seeks to directly address the issues above, ensuring the NHS is able to effectively manage its estate, and ensure the Plan is positively prepared and effective.

1. Where health facilities <u>are</u> considered to fall within the definition of community facilities, NHSPS requests modifications to the Policy and supporting paragraphs, in line with our responses at previous stages:

<u>Policy NC13</u>

"Development which would result in the loss of a valued community facility will be permitted where:

a) it has been shown that continued use as that community facility would be unviable; or
b) adequate equivalent alternative facilities would be available within 10 minutes walk (800 metres) of the site; or
c) a commuted sum is paid to enable the facility to be provided elsewhere within 10 minutes walk (800 metres) of the site; *or*
d) the facility is replaced as part of the new development; or e) the loss or change of use of existing facilities is part of a wider public service estate reorganisation or service transformation programme.

<u>Supporting Paragraph 4.50</u>

"When determining whether a 'use' constitutes a local community facility, the extent to which the community benefits from the facility, or the nature and extent of the need for that facility within a community, are relevant considerations. *In relation to Criteria (a), the ~~R~~r*emoval of a facility will not be permitted without firstly evidence would normally which be required to shows that there has been public consultation to ascertain the value of the facility to the local community; secondly it is unviable and; thirdly that the facility has been appropriately marketed to find a new occupier, at a comparable sales price or rent. to determine whether removal of that facility is supported. Evidence of viability should be demonstrated, where relevant to a particular facility, through an appropriate viability statement and evidence of marketing activities should be included within a Marketing Report. In the case of Assets of Community Value (see Glossary), the local community can have an opportunity to bid for the property, though that process is subject to viability considerations."

2. Where health facilities <u>are not</u> considered to fall within the definition of community facilities:

"When determining whether a 'use' constitutes a local community facility, the extent to which the community benefits from the facility, or the nature and extent of the need for that facility within a community, are relevant considerations. *Health facilities will not be considered as a local community facility use for the purposes of ensuring the NHS is able to effectively manage its estate. In relation to Criteria (a), the ~~R~~r*emoval of a facility will not be permitted without firstly evidence would normally which be required to shows that there has been public consultation to ascertain the value of the facility to the local community; secondly it is unviable and; thirdly that the facility has been appropriately marketed to find a new occupier, at a comparable sales price or rent. to determine whether removal of that facility is supported. Evidence of viability should be demonstrated, where relevant to a particular facility, through an appropriate viability statement and evidence of marketing activities should be included within a Marketing Report. In the case of Assets of Community Value (see Glossary), the local community can have an opportunity to bid for the property, though that process is subject to viability considerations."

NHS
Property Services

Conclusion

NHSPS thank Sheffield City Council for the opportunity to comment on the Sheffield Plan. We trust the above clarifies our position in order to ensure the NHS is able to effectively manage its estate and to ensure the soundness of the Local Plan, and we look forward to reviewing future iterations of the Plan. Should you have any queries or require any further information, please do not hesitate to contact me.

NHSPS would be grateful to be kept informed of the progression of the Local Plan and any future consultations via our dedicated email address, town.planning@property.nhs.uk.

Yours faithfully,

Hyacynth Cabiles MRTPI
[redacted]

REF5.0388

Main Modifications Consultation– CH03 (Warren Lane)

Introduction

This representation is submitted as a formal objection to the proposed allocation of Site CH03, including the Main Modifications.

It is considered that the allocation is unsound when assessed against the tests of soundness set out in the National Planning Policy Framework (NPPF, December 2023), specifically that it is not justified, not effective, and not consistent with national policy (paragraph 35).

1. Green Belt Harm/ Spatial Strategy

The site is a high-scoring Green Belt parcel (score 17) and forms the Boundary preventing settlement coalescence Sheffield & Barnsley

CH03 cannot be assessed in isolation as it forms a cluster of allocations with CH04, CH05, NES36, NES37, NES38 & NES39. These proposed Greenbelt sites create a significant outward expansion of the settlement boundary and result in a continuous tract of Greenbelt loss

The Plan assesses these sites individually. However, the true planning impact is cumulative and spatial, resulting in urban extension from contained growth. This cumulative effect is materially greater than the sum of individual site impacts and has not been adequately assessed.

The Sheffield Plan clearly states that development will be focused on Brownfield land, existing urban areas and higher density development, but the allocation of CH03 demonstrates clear inconsistency with the stated spatial strategy. In practice, the plan is relying on Greenbelt release to meet housing requirements, rather than prioritising urban regeneration.

Figure 1: Settlement Separation and Green Belt Context



Figure 1 shows the enclosure of Residential Area (Green) within existing & proposed Industrial Development (Red).

The site lies on the boundary between Sheffield and Barnsley, with the administrative boundary passing through the site Green Boundary Line.

Figure 2: Settlement Separation and Green Belt Context (Appendix 1)



Development of this site would contribute to the coalescence of these settlements, eroding their separate identities. The images above demonstrate the role of the site in maintaining separation and openness.

Preventing settlement merging is a fundamental purpose of Green Belt policy (NPPF paragraph 140), and maintaining openness is a key characteristic (paragraph 139).

The release of this site from the Green Belt has not been robustly justified, particularly given the extent of constraints affecting deliverability. This conflicts with NPPF paragraph 143, which requires exceptional circumstances to be fully evidenced.

2. Landscape, Character and Visual Impacts (IIA Sustainability SA8/ SA9)

- The site is currently in agricultural use, and the tenant farmers rely on this field for Grazing and livestock feed, the loss of such land will affect the livelihoods of these tenant farmers.

- The open rural character of the site would be replaced with Industrial Units, altering long-established landscape separation and negatively affecting local amenity and the wider visual character of openness.

Compounding the above the topography of the site is elevated and even with the proposed Buffer Zones the proposed units would shadow the adjacent residences conflicting with NPPF paragraph 191.

3. Transport, Highways and Access Constraints

Please see Appendix 6 Traffic Report by 'Ian Taylor I.Eng MICE':

The Plan promotes reduced reliance on private vehicles, increased walking, cycling and public transport use and the creation of 20-minute neighbourhoods. However, site CH03 is located on the edge of the urban area, is less well connected to key services and employment areas and is likely to result in car dependent travel patterns. This is in direct contravention of the IIA and site selection around sustainable transport.

- **Sustainable Travel Modes:**
  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 steep incline and is on a busy road, making it unattractive to pedestrians. In view of the above it is unlikely that anyone would walk to the site.
  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.
  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.
  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.

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.**

This raise's concerns in relation to NPPF paragraph 111, which requires that development should not result in unacceptable impacts on highway safety or severe cumulative impacts on the road network

4. Flood Risk and Drainage Issues

Flood risk has been identified as a constraint requiring mitigation.

In the absence of clear and robust evidence demonstrating that flood risk can be appropriately managed, the allocation conflicts with NPPF paragraphs 158–175, which require development to avoid areas at risk of flooding and not increase flood risk elsewhere.

The cumulative impact of the cluster of developments must be considered in relation to flood risk. The surrounding areas, including Nether Lane, Chapeltown Road, Blackburn Brook and Ecclesfield Park, have already experienced flooding during periods of prolonged rainfall. Undertaking flood risk assessment on a site-by-site basis at planning application stage puts our community at significant risk of the cumulative impacts of the significant Greenbelt developments planned in elevated positions around the area.

The site's clay soils and sloping topography raise concerns about increased surface water runoff and downstream flood risk with the bottom of the site often being waterlogged.

5. Heritage and Setting of Listed Buildings

The site is located within an area of archaeological interest and was once part of the Historical Tankersly Deer Park (Warren). NPPF paragraphs 195–199 require heritage assets to be conserved in a manner appropriate to their significance. The absence of detailed archaeological investigation introduces further uncertainty and constraint on the developable area.

6. Ecological and Biodiversity Concerns

The Site Allocations Schedule demonstrates that development sites require Biological Net Gain, Ecological Mitigation and Protection of Environmental features, thereby confirming the selected sites have environmental value.

CH03 supports protected and priority/ protected species, including skylarks, bats, badgers, owls, Kestrels and a range of other birds and mammals.

Ancient hedgerows and wildlife corridors contribute to local ecological connectivity on CH03. Again, there is a specification that Hedgerows 'must be retained' as wildlife corridors where possible as part of the master planning of the site for and within subsequent planning applications, yet this has not been specified for this site with only vague reference to 'exploring' ecological corridors and 'where feasible' BNG delivered onsite.

No Biodiversity Net Gain strategy has been prepared, despite statutory requirements for 10% BNG and there is a lack of clear mitigation measures outlined for the loss of this undeveloped land and habitat.

Mitigation measures cannot fully replicate the ecological function of Green Belt land and Biodiversity Net Gain does not compensate for the loss of Green Belt openness or strategic green infrastructure, particularly when factoring in the significant amount of Greenbelt within such a small radius across the local community.

CH03 (Warren Lane) should not be built upon and should instead be removed from the Sheffield Plan because it consists almost entirely of Grade 2 agricultural land, classified as Best and Most Versatile (BMV), making it one of the highest quality and most productive land types in England. Under the National Planning Policy Framework (NPPF), significant weight should be given to the economic and other benefits of BMV agricultural land, and where development is necessary,

areas of poorer quality land should be preferred. CH03 directly conflicts with this principle, as it represents a high-value resource that would be permanently lost if developed. The evidence shows that a substantial proportion of the proposed Green Belt release already affects BMV land—at least 53%—meaning the inclusion of CH03 would further intensify this harm unnecessarily. In contrast, alternative sites within the plan consist largely of lower-quality, non-BMV land, demonstrating that less harmful options are available. Retaining CH03 in the plan therefore undermines compliance with national policy, weakens the sustainable use of land, and fails to justify the avoidable loss of one of Sheffield's most valuable agricultural assets!

Site	Housing Area	Gross Site Area (Ha)	Housing	Predictive ALC	Comments
CH03	Chapeltown & Ecclesfield	**18.06**		**Grade 2**	**BMV**

Key

Colour	ALC Class	Quality	BMV
Blue/cyan	Class 2	Very good	Yes
Dark green	Class 3a	Good	Yes
Light green	Class 3b	Moderate	No
Yellow	Class 4	Poor	No
Brown	Class 5	Very poor	No
Amber	NA	Not applicable	No

CH03 (Warren Lane)

BMV: almost all Grade 2, with a tiny amount of 3b in the west and NA in the north west.



7. Mining and Ground Contamination/ Stability Risks

Large portions of the site fall within a Coal Authority Development High Risk Area with known mine entries and shallow workings being present on site. In addition, the site is near a historic landfill site.

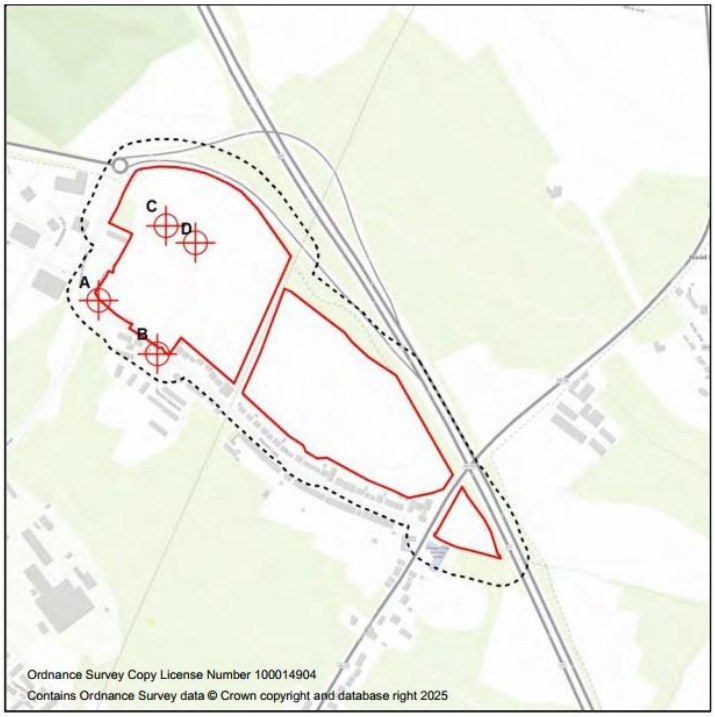
Figure 3: Mining Feature Plan (Appendix 3)

SITE LOCATION AND COAL MINING FEATURE PLAN

ADDRESS: Warren Lane, Tankersley, Sheffield, S35 2YD

SEARCH NUMBER: 473232

COAL SEARCH PLUS+
Protecting your investment



Ordnance Survey Copy License Number 100014904
Contains Ordnance Survey data © Crown copyright and database right 2025

KEY

Property Boundary

50m property boundary buffer

Coal mining subsidence claims within 50m (section 7)

Mine entries within 20m (section 5)

Adits

Shafts

Symbols are indicative only and are not drawn to scale.

World Topographic Map - Sources: Esri, HERE, Garmin, Intermap, Increment P Corp, GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, © OpenStreetMap contributors, and the GIS User Community

This plan shows the location of the subject property and where relevant the location of mine entries and subsidence claims referred to in the attached CoalSearchPlus+ regulated coal mining search report. The plan must be viewed in conjunction with the detailed findings in the attached report. A coal mining risk rating, including recommended further action where appropriate, is given at the conclusion of the report. (section 8)

This plan shows reportable features relevant to the property only. Additional relevant coal mining aspects are reported upon within the report. The report and content of this plan are specific to the property under consideration. The report contents should not be used in relation to other property in the area.

Coal Mining Constraints Plan

Figure 3: Coal Mining Constraints and No-Build Zones (Appendix 3)
The site is located within an area of historic mining activity and lies within proximity to a historic landfill.

These factors introduce risks relating to:

- Land instability
- Contamination
- Ground gas migration

The mining plan identifies shafts and exclusion zones which further restrict development potential and indicate that 'no build zones' are likely to be required.

Allocating the site without full investigation and resolution of these issues is inconsistent with NPPF paragraph 189, which requires land to be suitable for its intended use.

The presence of both of these near to any planned development could significantly affect the site viability and deliverability and remediation works on a site with mineshafts and voids raise significant safety concerns for nearby Residences and infrastructure, including the Tankersly Railway Tunnel and line.

The site raises serious environmental concerns. It is identified as potentially contaminated and lies within 250 metres of a historic landfill and historic mining activity. These factors introduce risks relating to land instability, contamination, and gas migration. The allocation of the site prior to full investigation and resolution of these issues is inconsistent with NPPF paragraph 189, which requires land to be suitable for its intended use, including safe ground conditions. This is further supported by Exam 148, which identifies potential land instability and "no build zones likely" (pages 5–6) Appendix 3.

EXAM 188 identifies CH03 as being within a Development High Risk Area, with approximately three recorded mine entries, surface mining activity affecting a significant portion of the site, and probable shallow coal workings across the site.
The Mining Remediation Authority advises that these features require detailed investigation, layout avoidance and are likely to require remediation. These constraints are site-wide and have direct implications for developable area and layout. There is no evidence that this has been reflected in the site's capacity assumptions, meaning deliverability remains uncertain

Buffer Constraints Plan (Appendix 1)
The plan illustrates the cumulative spatial impact of buffers, restrictions, and infrastructure constraints across the site. It demonstrates how developable land is significantly reduced when these factors are applied in combination.

8. Residential Amenity Impacts

The site lies near existing residential properties along Warren Lane and adjacent to Retirement & Care Homes.

The proposed B2 (general industrial) and B8 (storage and distribution) uses would be highly likely to generate noise, disturbance, lighting, and increased vehicle movements. These impacts would materially affect residents' ability to reasonably enjoy their homes.

To mitigate such impacts, a landscape buffer would be required. In practice, a buffer of at least 20–30 meters (and potentially greater for industrial uses) would be necessary. However, no minimum buffer width is specified.

The requirement for such buffers would significantly reduce the developable area of the site.

In addition, local residential properties are already located within approximately 200 meters of the M1 motorway, which carries very high traffic volumes. This creates an elevated baseline of environmental stress. Additional industrial development would compound these impacts, resulting in unacceptable cumulative effects.

This conflicts with NPPF paragraph 191, which requires planning decisions to avoid significant adverse impacts on health and quality of life.

9. Physical and Infrastructure Constraints

The site is affected by several major physical constraints:

- Northern Powergrid infrastructure and associated exclusion zones
- Overhead power lines requiring safety clearances
- The Tankersley Railway Tunnel running beneath part of the site
- Limited Access opportunities to Site

These constraints prevent built development across significant areas.

When combined with required buffers, access arrangements, and mitigation measures, the cumulative effect is a substantial reduction in usable land (Appendix 1)

10. Deliverability and Phasing Uncertainty

The first completions are only projected from 2035 on this site, offering little contribution to the five-year land supply. Other sites with significantly shorter lead in times and build out periods have been proposed and dismissed without clear justifiable reasons.

A 10-year build period would impose prolonged construction disruption on residents and local Care Homes, made worse by the cumulative impacts from other planned developments in the very local area.

The cumulative effect of the constraints identified reduces the developable area from approximately 18.2 hectares to around 11 hectares.

This represents a substantial reduction of approximately 40%, fundamentally undermining the site's viability and effectiveness as an employment allocation.

11. Conclusion

Site CH03 presents substantial unresolved issues relating to Green Belt harm, infrastructure capacity, road safety, landscape impact, biodiversity, heritage, drainage, and viability. We do not believe that the main modifications proposed for CH05 provide adequate compensation or mitigation for the irreversible and permanent damage that will result should this site be allocated for development. The IIA consistently shows that Greenfield / Green Belt sites perform worse environmentally, and Brownfield sites perform more favorably. Despite this, the Plan proceeds to allocate the site. This creates a clear and significant issue in that

the Plan selects sites that the IIA identifies as harmful, without adequately explaining why lower-impact alternatives have been rejected thereby undermining the 'justified' test of soundness as the evidence base does not support the chosen strategy.

For the reasons set out above, Site CH03 is not:

- Justified contrary to NPPF paragraph 35(a);
- Effective due to significant constraints reducing the developable area **(from approximately 18.2ha to circa 11ha – Appendix 1)**, contrary to NPPF paragraph 35(b);
- Consistent with national policy including paragraphs 111, 139–143, 158–175, 189 and 191.
- Demonstrably deliverable given the scale of unresolved constraints and risks to residential amenities
- It causes significant harm to Green Belt purposes and openness
- It contributes to cumulative urban expansion when considered with nearby sites
- It conflicts with the Plan's spatial strategy
- It is contrary to IIA findings, which identify environmental harm
- It is in a less sustainable, car-dependent location
- It is not supported by a robust case for exceptional circumstances

The extent and interaction of constraints fundamentally undermine the suitability of the site for allocation.

It is therefore respectfully requested that Site CH03 be removed from the plan.

REF5.0389

Outlook

(Case Ref: ZA35287) Correspondence from Office of Clive Betts MP

From [redacted]
Date Tue 2026-05-05 10:39 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

3 attachments (3 MB)
May 2026 Local Plan submission.pdf; sheffield-housing-density.pdf; Summary of Predictive ALC Mapping.pdf;

External email

Good morning,

Please find attached Clive Betts MP submission for the latest Local Plan consultation along with two supporting documents he refers to in said submission.

Best,

Michael Chilton
Office of Clive Betts MP

Local Plan submission – Main Modifications consultation

1.0 Introduction

Following the Planning Inspectorate's letter to Sheffield City Council on the 16th January this is my formal submission in this latest consultation.

My submission is split into three main sections that cover general comments that do not directly relate to the main modifications and newly released documents but I believe are still relevant, specific concerns with the latest stages of the Local Plan including new information that has come to light on one of the sites, before a closing summary of my position.

2.0 General commentary

I preface these comments with the acknowledgment that the Planning Inspector's letter is not their final report and only an intermediary point in their process. However, I do have grave concerns that neither the general points raised by myself and many other residents, nor our technical issues with particular sites in the Local Plan were addressed.

For the sake of transparency, accountability and fairness residents and I need to see our specific objections and concerns responded to. I accept that may not be at this juncture in the Local Plan, but I expect to see these answered in the final report.

As of right now I am still at a loss as to how this decision was made by the Inspectorate given the fundamental constraints raised around these sites. We must see the Inspectorate's view of these so we can understand the rationale behind the decision made.

This same concern applies to Eckington Way. Given the fundamental constraints raised about the site such as its topography, pylons and shallow gas main running through the site and road network reaching 100% capacity I am also shocked the Inspectorate would consider this site viable deliverable, and sustainable

I also want to take this opportunity to highlight how the Council have (deliberately) deployed flawed reasoning to reach the conclusion they wanted to. It was argued that Eckington Way was to remain due to there being no other available land, yet when green belt release was seen as necessary the very site we had asked the Council to consider was discounted because the Council said Eckington Way was already in the Local Plan.

I find this deeply cynical and reflective of a Council that had already made up its mind, rather than having a genuine conversation and consultation with local communities. Instead of working for and with our communities to find a more acceptable proposal they pressed on with what they had already decided upon. I cannot help but be deeply cynical of this move and how poorly it reflects upon the whole Local Plan process.

While the last point is an issue I have with the Council acting poorly and not necessarily something the Inspectorate would take a direct view on in their final report, I hope the other issues raised will be covered so we can at least understand the Planning Inspectorate's reasoning.

3.0 Specific issues with the Main Modifications

3.1 Gaps in information

Despite the significant amount of information provided in this Local Plan process I also am concerned that there are still gaps in information that need to be highlighted.

There was the expectation that these main modifications would have been an opportunity to provide updated documentation. This has not happened. For example, there the specific concern regarding Yorkshire Water owned land on the SES29 site that would have direct implications over the developable space available. As far as I am aware the Council are aware of this but have not offered any amendment to the site despite recognising the ownership is more complicated than previously thought.

Secondly, there are significant pieces of work that are entirely absent from the documents provided by Sheffield City Council. For instance, it would have been useful to reflect on the current usage of these green spaces (SES29, SES30, SS19). I know that the Beaver Hill site is used regularly by residents, something the Planning Inspector themselves admitted at the Hearing. I say this considering my previous remarks on the importance these spaces provided during the pandemic. This should also play a role in the decision-making process but is absent from the Council's submitted documents.

3.2 New information

While the reason for this consultation is to consider the further published documentation regarding the plan there are two new developments that I do think are materially relevant for the Planning Inspectorate to consider relating to two of the sites.

The first of these relates to SES30 where a recent successful application to South Yorkshire Heritage List has identified a Quaker burial site in the North East portion of the site. This is the same area where one of the access points to the proposed housing estate has been proposed.

Alongside all the other constraints with this site I must repeat that this site is simply not deliverable. The section that the South Yorkshire Heritage site would cover makes it exceedingly difficult to deliver a coherent access point to the site that could hand the amount of traffic expected from the development.

In addition, I am aware there is further work to get heritage recognition for the site of the "Battle of Orgreave" as well which, if successful, will also have consequences for the deliverability of the Handsworth Hall Farm site (SES29).

Together, this represents yet another fundamental constraint on SES30 and possible constraint on SES29 that brings into question how deliverable these sites are in this Local Plan.

The second new development that I want to draw attention to is a recently announced site (Ref: 45900) in North East Derbyshire's Local Plan that is situated immediately over the border to Sheffield and in close proximity to SS19 which is the proposed housing site off White Lane.

I recognise that individual local authorities are responsible for their own plans, but there needs to be some understanding that there will necessarily be mutual causes for concern when there are developments on an authority's immediate border and that the cumulative effect it has for the area.

This case of both SES30 on White Lane and Ref:45900 from North East Derbyshire should trigger a further rethink by both sides as to how both developments will impact the local infrastructure. It cannot be the case that both are allowed through without the consideration of the other. I trust this is something the Inspectorate will now look at.

I have said before that I can see a Local Plan where development on White Lane could be acceptable, however this latest addition moves us further away from that not closer. Especially given my other concerns I remain deeply sceptical that the current site is suitable or deliverable for the area.

Another new development that has come to light is EXAM 216. Assurances had previously been given that there would be funding available for road upgrade works and transport improvements. I did highlight in my previous submission that this was not the case. To add to that, EXAM 216 outlines that one of the vital schemes for the area to improve road capacity has been withdrawn by the Government due to a lack of local funding to contribute to the scheme.

This is obviously disappointing but understandable given the constraints we face on spending currently. It does though again undermine the idea that significant infrastructure work will happen soon to accommodate the two very large Handsworth developments. Wishful thinking has already led us to a breaking point where the local transport infrastructure cannot cope with what development there already is, we cannot allow it to continue and allow further development with no transport plan to accommodate it.

Finally, and while I recognise this is not materially new information following your latest judgement letter there has been some excellent work by local residents in my constituency that questions some of the assumptions made in the Local Plan itself. Chiefly that is the incredibly unambitious housing density figures the Council have arrived at.

I have included this as a separate document, but it very concisely shows that Leeds as a comparable city to Sheffield has a far higher density in housing than Sheffield when it comes to developing land for housing. I am not necessarily saying Sheffield can exceed or match Leeds exactly, but it is distinctively unambitious in its Local Plan figures.

Finally, just to again reflect on the poor reasoning SCC have employed throughout this process, I also attach a document that examines the agricultural grade of the land being put up for development. Specifically, SES30 is predicted to have some of the highest scoring land for this use.

I am not an alarmist over our food security, broadly I think the current split between imports (60% approx.) and imports (40% approx.) is sensible. However, given that this will be a permanent development I do not understand why our best farmable land is what the Council seem to be suggesting we develop on first. I raise this especially in contrast to Ryecroft Farm in Dore which I know I have mentioned previously during my written and oral submissions and is predicted to contain much poorer agricultural land.

I recognise that some of these points may not be material to the main modification, but I continue to be utterly bewildered to see no strong justification from the Council regarding the sites in my constituency, and a distinct lack of justification for excluding others like Ryecroft.

4.0 Summary

I want to begin my concluding remarks with what I have said from the beginning of the green belt release. I do accept that we must build on green belt. Where I will commend the Council is they have genuinely taken a brownfield first approach. My office and I are yet to find a brownfield site that is not already allocated, unsuitable for development, or part of the windfall provision outlined in the Plan.

However, the distribution of green belt sites remains incredibly unfair on the South East and North East of the city which remain the poorer parts of Sheffield compared to the more affluent West. On that basis I cannot tell my constituents this Local Plan is fair.

This further submission I hope reinforces my deeply held misgivings about the current Local Plan and that the Council have failed to justify their decisions to show this Local Plan is positively prepared and effective, and for specific sites that they are even deliverable. The main modifications do not answer these questions either and leave me deeply confused as to how we have got here.

Finally, there has been new information that is materially relevant to the Local Plan such as the development proposed by North East Derbyshire and the Heritage application for the Quaker Burial Ground that the Inspectorate must consider.

I will of course await the final report and trust that the objections I and my constituents have raised will at last be responded to there, but I do remain deeply sceptical that this Local Plan is fair or takes into account quite technical and valid issues with some of the sites included.

SAVES13GREENBELT.ORG.UK

Sheffield doesn't need to destroy Green Belt - *it needs to build smarter*

Official government data shows Sheffield is one of England's least dense cities. Modest changes in housing density could meet targets without sacrificing a single hectare of Green Belt.

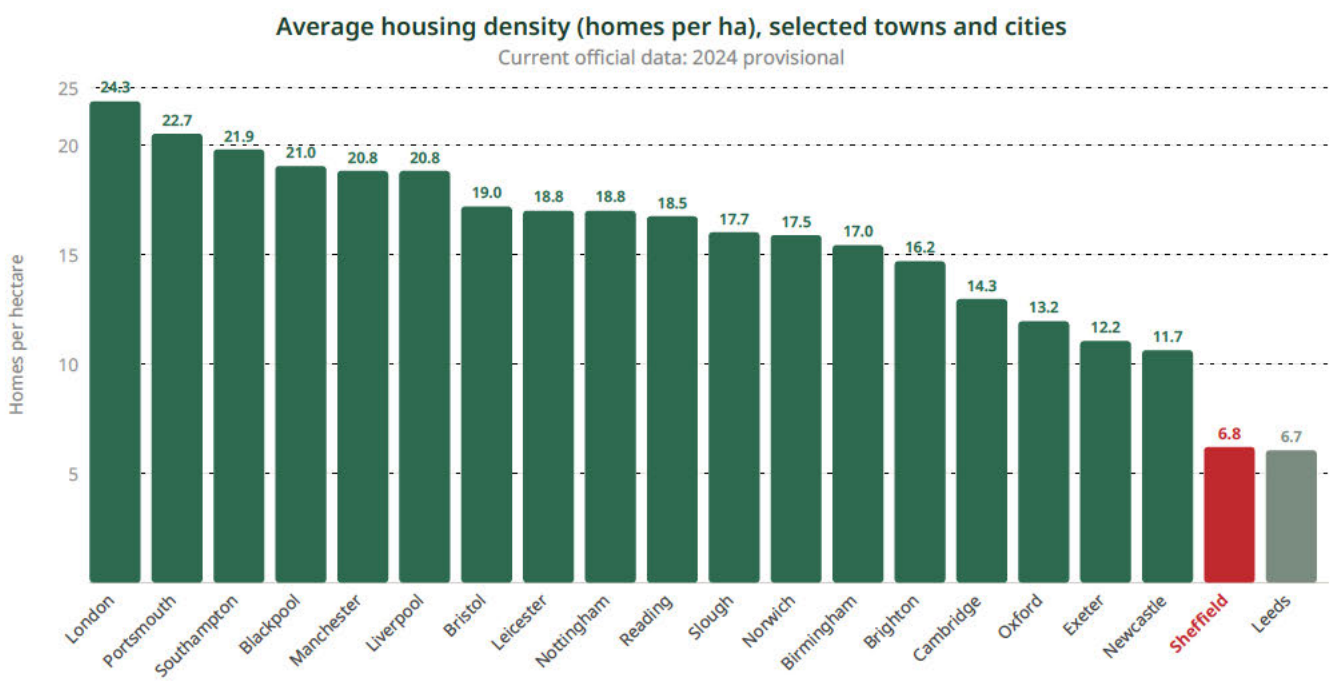
Sheffield City Council says it has no choice but to release **234 hectares of Green Belt** - including **172 hectares of farmland** - to meet housing targets. But the data tells a very different story. Sheffield is building at some of the lowest densities of any major English city, and this strategic failure is the real reason Green Belt is on the chopping block.

6.8	18.1	2,870
Homes per hectare - Sheffield's authority-wide average*	Homes per hectare - average of comparable English cities	Extra homes achievable in Sheffield centre alone by matching Leeds' density

The choice facing Sheffield is not "housing versus Green Belt". It is lazy, low-density sprawl versus smart city-building. And the evidence shows that sprawl doesn't just destroy Green Belt - it makes the city poorer.

The numbers speak for themselves

The chart below uses official MHCLG data to compare authority-wide housing density across 20 English towns and cities. Sheffield sits second from bottom - at just **6.84 homes per hectare**.



Source: MHCLG / DLUHC Live Table 126: Dwelling stock density estimates by local authority district (2024 provisional).

To put this in context: Portsmouth fits 22.7 homes into every hectare. Manchester achieves 20.8. Even mid-sized cities like Norwich (17.5) and Exeter (12.2) are dramatically denser than Sheffield.

A note on the numbers

Sheffield's overall figure is partly explained by the fact that around a third of the local authority area falls within the **Peak District National Park** - moorland, reservoirs and countryside where little or no housing will ever be built. This drags the authority-wide average down. Leeds has a similar issue, with a very large authority boundary and extensive rural fringes - which is why the two cities sit side by side at the bottom of the chart.

But far from weakening the density argument, this makes it *stronger*. If so much of Sheffield's land is undevelopable national park, it becomes even more important to build ambitiously on the urban land that *is* available - rather than spreading outward at low densities onto Green Belt farmland and wasting the city's scarce developable land. And the like-for-like comparison with Leeds holds: both cities have the same kind of large, partly rural authority area, yet Leeds is achieving far higher densities on its development sites.

Where the argument really bites is not in the authority-wide averages but in the **planned density assumptions** for individual sites - and that is where the gap between Sheffield's ambition and Leeds' performance becomes impossible to ignore.

The Leeds comparison: same starting point, different ambition

Leeds is particularly instructive. It sits right alongside Sheffield at the bottom of the density chart (6.68 homes per hectare) - the two cities could hardly be more similar in their current overall density. But look at what Leeds is *achieving* in its new developments, compared to what Sheffield is merely *assuming*:

AREA TYPE	LEEDS - ACHIEVED	SHEFFIELD - PLANNED	GAP
City centre	350 dph	300 dph	-14%
Main urban areas & larger towns	85 dph	35-50 dph	-41% to -59%
Rural areas	35 dph	30 dph	-14%

Sources: Leeds Local Plan (achieved densities); Sheffield Housing and Economic Land Availability Assessment (plan assumptions). dph = dwellings per hectare.

The most striking gap is in urban areas and larger towns: Leeds achieves **85 dwellings per hectare**, while Sheffield plans for just **35 to 50**. That is not a marginal difference - Sheffield is building at roughly half the density of its nearest comparable city.

And the results speak for themselves. Leeds now has the highest wages outside London, the highest number of large corporate headquarters outside the capital, and is outperforming

Sheffield across a range of economic measures. The **Centre for Cities** research is clear: population density within 30 minutes of the city centre on public transport is a key driver of economic performance, because it creates the talent pool that attracts businesses and investment.

2,870

additional homes in the city centre alone

Applying Leeds' achieved city centre density (350 dph) to Sheffield's central area would yield approximately 2,870 extra units - a 16% uplift - without touching any Green Belt land.

That single change - building at the density Leeds is *already* achieving, not some theoretical maximum - would go a very long way towards closing the shortfall that the council claims necessitates Green Belt release. And that is before considering the enormous headroom in urban areas and towns, where Sheffield's assumptions are 40-60% below Leeds' achieved performance.

This is not just a technocratic argument about housing numbers. It is about the kind of city Sheffield wants to be. As former Green Party leader Cllr Douglas Johnson put it when the Green Belt allocations came before full council:

> **"It is important for climate change and the climate emergency that we should build in city centres so that people can walk to work from warm, well-insulated homes rather than having to drive in from the outskirts of the city".**
>
> - Cllr Douglas Johnson, Green Party, Sheffield full council meeting (Sheffield Star)

Denser city-centre development means walkable neighbourhoods, lower carbon emissions, warmer and better-insulated homes, and residents who contribute to - rather than drain - the city's economic vitality. Low-density Green Belt sprawl delivers the opposite on every count.

Higher density does not mean "slums"

Whenever density is raised in public debate, someone will say it means tower blocks, cramped living, or "building slums". This is a myth - and one that the evidence roundly contradicts.

> **"Higher density doesn't have to mean high-rise buildings - cities like Paris and Barcelona show how low-rise, high-density areas can work well and be more environmentally-friendly".**
>
> - Leeds City Council, current Local Plan consultation

The places that most people would *choose* to live, given the option, are almost always medium-to-high density: the terraces of Nether Edge, the streets around Ecclesall Road, the Victorian and Edwardian neighbourhoods of Broomhill and Crookes. These are among Sheffield's most sought-after postcodes. They are also, by the standards of this debate, relatively high-density - rows of terraced houses, small apartment buildings, shops and cafés at street level, tree-lined avenues. Nobody calls them slums. They are the backbone of what makes Sheffield attractive.

What does "higher density" actually look like?

~40-60 DWELLINGS PER HECTARE

Traditional terraced streets - like Nether Edge, Crookes, or Hillsborough. Front doors on the street, small gardens, a neighbourhood feel.

~60-100 DWELLINGS PER HECTARE

Low-rise apartments and townhouses - like much of inner-city Leeds, or the best of continental European urbanism. Three to five storeys, courtyards, mixed use.

~100-200 DWELLINGS PER HECTARE

Mansion blocks and medium-rise - like Kelham Island's newer schemes, or the Parisian model of 5-7 storey buildings with generous interiors.

LEEDS URBAN AREAS: 85 DPH - ACHIEVED

Already delivered - not theoretical. Medium-density, mixed-tenure neighbourhoods in a city with an almost identical overall density to Sheffield. No tower blocks required.

Paris - one of the most beautiful and desirable cities on earth - achieves its character almost entirely through buildings of five to seven storeys. Barcelona's famous grid of apartment blocks creates one of the world's great streetscapes. Neither city relies on tower blocks. Both are vastly denser than Sheffield.

The real density scandal

The Green Belt sites in Sheffield are planned at **30-40 dwellings per hectare**. Sheffield's urban brownfield sites are assumed at just **35-50 dph**. The gap between them is small - in some cases, the council plans to build at almost identical densities on city-centre brownfield land and on open Green Belt miles from the centre.

That is the heart of the problem. If the council assumed urban densities in line with what Leeds already achieves (85 dph in urban areas, 350 dph in the city centre), the need for Green Belt release shrinks dramatically - or disappears entirely.

The question is not whether 30-40 dph is a reasonable density for a suburban housing estate. It is why the council is proposing to destroy Green Belt to build at suburban densities when it has not come close to exhausting the potential of its urban sites. Identikit estates on former Green Belt, with no character, no local economy, no walkable amenities, and entirely car-dependent access, add nothing that could not be delivered - better - on brownfield land built to the standards that Leeds has already demonstrated are achievable.

Sprawl makes Sheffield poorer

This is perhaps the most important and least discussed aspect of the Local Plan. Low-density Green Belt development does not just fail to help Sheffield's economy - it actively harms it.

Currently, just **35%** of Sheffield's population can reach the city centre by public transport within 30 minutes. This gives the city an "effective population" of roughly 298,000 - putting it on a par with Dresden rather than a comparably-sized city like Bilbao. Building thousands of homes on the Green Belt fringe, miles from the city centre with poor public transport links, will push that figure further in the wrong direction.

> **"The UK's secondary cities are not very dense. This matters: fewer residents living in their built-up areas reduces the pool of workers that city centre firms can hire from".**
>
> - Centre for Cities, 2025

Centre for Cities research shows that over the period 2011-2019, the cumulative effect of development in Sheffield was to *decrease* the city's overall density - with low-density developments consuming land faster than they added dwellings. The Local Plan's Green Belt proposals would accelerate exactly this trend: spreading out the city's population even further, weakening the talent pool, and making Sheffield less attractive to the businesses and investment it desperately needs.

Building denser, closer to the centre, does the opposite. It grows the accessible workforce, supports public transport viability, sustains local high streets, and creates the kind of vibrant, walkable neighbourhoods that attract young graduates and growing businesses.

The council's "brownfield is maximised" claim doesn't stack up

Sheffield City Council's response to anyone questioning Green Belt release is always the same: all brownfield sites have been used. But this claim does not withstand scrutiny when you look at the densities being assumed.

If every urban site in the Local Plan were developed at Leeds' achieved densities rather than Sheffield's conservative assumptions, thousands of additional homes would be deliverable on land already identified for development. The council is not being asked to find new sites - it is being asked to use the sites it already has more ambitiously.

A core city calibrating its ambition to rural districts

Sheffield City Council's assumptions about how much of each development site can actually be built on - the "net developable area" - are based on rules of thumb drawn from analysis undertaken by **Bolsover District Council**. The same approach is used by other councils in the **East Midlands Northern Sub-Region: Chesterfield, North East Derbyshire, Bolsover and Bassetlaw** - all small, predominantly rural or semi-rural authorities.

Sheffield adopted this methodology in 2008 through its joint housing land assessment with Rotherham. Even then, the authors could not identify when the Bolsover analysis had been carried out, leaving the reference marked simply **"(date?)"**. Yet the same approach still underpins the 2023 Housing and Economic Land Availability Assessment that drives the Local Plan.

In other words, an undated piece of analysis from a small rural district council now determines Sheffield's developable land assumptions.

No other English core city we could find uses Bolsover's methodology. Gloucester's 2025 Urban Capacity Study, for example, applies the **National Model Design Code**, which assumes 60-120 dwellings per hectare for urban neighbourhoods - two to three times Sheffield's assumptions.

England's fourth largest city is calibrating its land supply calculations to rules designed for rural Derbyshire - and using the result to justify destroying 234 hectares of Green Belt.

Furthermore, examples of extremely low-density development continue to be approved on brownfield land within the city. As recently as 2025, planning permission was granted for part of a

37-acre former industrial site off Baslow Road - for just **8 executive homes**. A formerly-developed site in the Green Belt, built out at a density so low it barely registers.

What should happen instead

Nobody is suggesting Sheffield should become Manhattan. The argument is far more modest than that: Sheffield should build at the densities its nearest comparable city is already achieving. This means:

1. **Setting density targets in line with Leeds' performance** - particularly in the city centre and main urban areas, where the gap is largest. Matching Leeds' city centre density alone would deliver approximately 2,870 additional homes.
2. **An honest assessment of "brownfield maximisation"** - examining whether conservative density assumptions have artificially created a shortfall that doesn't need to exist, rather than repeating the assertion without evidence.
3. **Recognising that sprawl is not neutral** - spreading the city ever further outward, at ever lower densities, is not just bad for the Green Belt. It is bad for Sheffield's economy, its public transport, its high streets, and its long-term prosperity.

The **3,806 homes** planned for Green Belt sites could largely be accommodated through smarter use of existing urban land. The **172 hectares of farmland** earmarked for destruction could remain productive. And Sheffield could begin to build the denser, more connected, more economically competitive city it needs to become.

The council's choice to reach for the Green Belt is not a necessity. It is a failure of ambition.

Make your voice heard

Sheffield's Green Belt deserves better than destruction by low-density sprawl. Help us make the case for smarter development that protects the Green Belt and strengthens the city.

Sources: *Density comparison research drawn from representation by Stephanie Oliver-Beech (July 2025, REF1.1933).*

© 2026 Save S13 Green Belt · saves13greenbelt.org.uk

Predictive ALC Categorisation of the Green Belt Release Sites

Blog article on the map
https://defraenvironment.blog.gov.uk/2026/04/13/unlocking-the-national-soil-map-free-and-unrestricted-access-to-england-and-waless-most-comprehensive-soil-data/

Link to map https://environment.data.gov.uk/dataset/a817d96f-271d-487b-89ad-48d271f931aa

Table of Results

Site	Housing Area	Gross Site Area (Ha)	Housing	Predictive ALC	Comments
CH03	Chapeltown & Ecclesfield	**18.06**		**Grade 2**	**BMV**
CH04	Chapeltown & Ecclesfield	15.61		Grade 3b, NA	Not BMV
CH05	Chapeltown & Ecclesfield	19.62	549	Grade 3b	Not BMV
NES36	Chapeltown & Ecclesfield	16.37		Grade 3b	Not BMV
NES37	Chapeltown & Ecclesfield	29.80	592	Grade 2 and 4	Mixed BMV
NES38	Chapeltown & Ecclesfield	**6.72**	**188**	**Grade 2, 3a**	**BMV**
NES39	Chapeltown & Ecclesfield	**2.10**	**66**	**Grade 2, 3b**	**BMV**
NWS30	Rural Upper Don Valley	**2.56**	**69**	**Grade 2, 3b**	**BMV**
NWS31	Rural Upper Don Valley	3.85	103	Grade 3b, 4	Not BMV
SES29	Handsworth, South East	**56.92**	**870**	**Grade 3a**	**BMV**
SES30	Handsworth, South East	**35.28**	**827**	**Grade 2, 3a**	**BMV**
SS19	Birley, South East	10.84	304	Grade 3b	Not BMV
SWS18	Lodge Moor, South West	9.20	258	Grade 5	Not BMV
SWS19	Dore, South West	2.61	80	Grade 4	Not BMV
		229.54	3,906		

At least 121.64 Ha is BMV (not including NES37, which is difficult to assess accurately because it contains a mix of BMV/not BMV). That is at least 53% of the proposed Green Belt release.

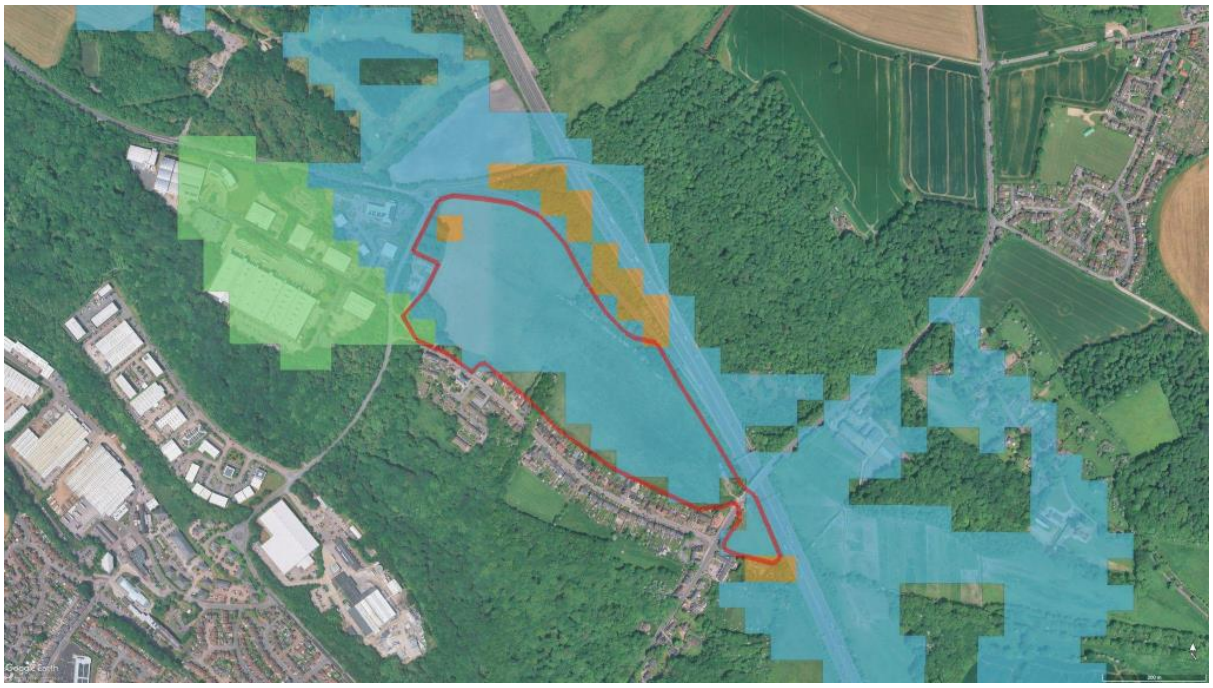
Notes on maps: For clarity, all U (uncategorized) land is not shown anywhere. Only Class 1 - NA within the red line boundary have been kept.

Key

Colour	ALC Class	Quality	BMV
Blue/cyan	Class 2	Very good	Yes
Dark green	Class 3a	Good	Yes
Light green	Class 3b	Moderate	No
Yellow	Class 4	Poor	No
Brown	Class 5	Very poor	No
Amber	NA	Not applicable	No

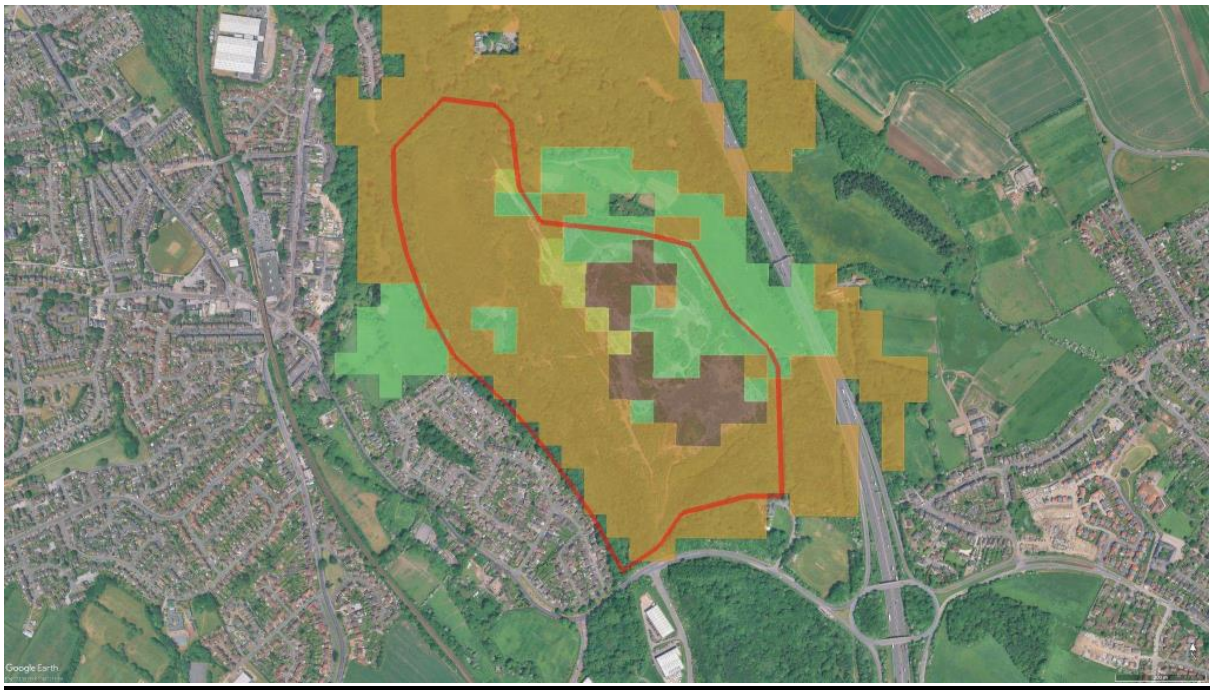
CH03 (Warren Lane)

BMV: almost all Grade 2, with a tiny amount of 3b in the west and NA in the north west.



CH04 (Hesley Wood)

Not BMV: mostly NA with some Grade 3b, 4 and 5. Expected: contaminated land.



CH05 (Strawberry Fields)

Not BMV: almost all 3b, with a tiny amount of Grade 4 along the western boundary.



NES36

Not BMV: mostly Grade 3b with some NA



NES37 (Town End Farm)

Mixed BMV/not BMV: Grade 4, but with a significant amount of Grade 2 in the west.



NES38 (Holme Lane Farm)

BMV: Grade 2 and 3a.



NES39 (Middleton Lane)

Mostly BMV: Class 2, with some Class 3b



NWS30 (Forge Lane)

Mostly Class 2 with some Class 3b and NA.



NWS31 (School Lane)

Not BMV: mix of 3b, 4, NA with a small amount of Class 2 on the southern boundary.



SES29 (Handsworth Hall Farm)

BMV: mostly 3a with a small amount of 3b due to topography. Tiny amount of NA.



SES30 (Bramley Common)

BMV: significant Grade 2 with remainder 3a. Small amount of 3b on southern boundaries due to site topography.



SS19 (White Lane)

Not BMV: almost all Grade 3b with a small amount of U.



SWS18 (Lodge Moor Lane)

Not BMV: Grade 5 with a tiny amount of U.



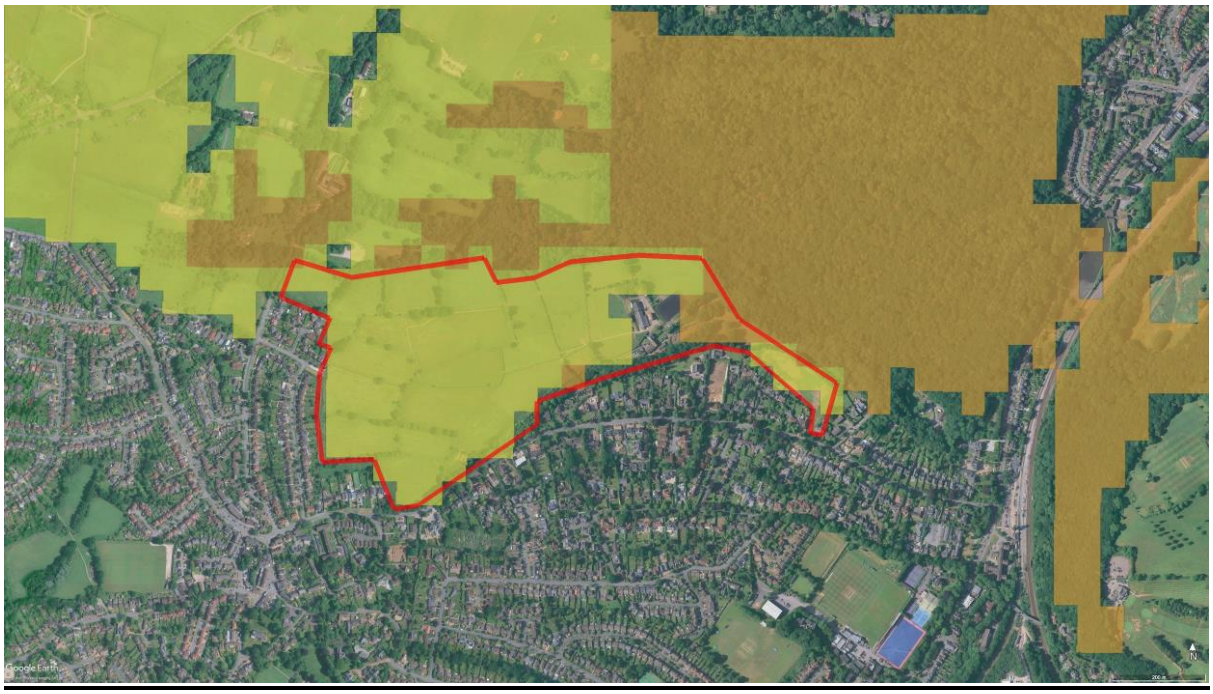
SWS19 (Parkers Lane)

Not BMV: Grade 4 and NA.



Ryecroft Farm (Dore)

Not BMV: mostly Grade 4 with NA and U (not shown).



REF5.0390

Outlook

Re: Sheffield Plan – Main Modifications representation

From [redacted]

Date Tue 2026-05-05 10:58 AM

To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

To: Strategic Planning
5th Floor, Howden House,

Sheffield, S1 2SH

Email: sheffieldplan@sheffield.gov.uk

Dear Planning Inspector,

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

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.

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

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

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

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

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

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

The Council acknowledges that:

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

- I regularly enjoy walking in this field with my two dogs, relishing the green space and accessing the field from Don Avenue. Sheffield is known for its green spaces and this is a significant draw to the city, to lose these would be a true shame with far reaching impact. It's one of the only accessible open spaces that we have, as much of our surrounding area is privately owned farmland, and connecting to Wharncliffe woods / Oughtibridge hasn't been truly established despite promises in the recent Paper Mill housing development.
- The government's Fit for the Future: 10 Year Health Plan for England has three core principles at its heart, including from sickness to prevention: we'll reach patients earlier and make the healthy choice the easy choice (https://www.england.nhs.uk/long-term-plan/)
- Keeping the field would be an easy healthy choice and continue to allow a wide variety of our community to move more and lead a healthier, happier life. Brisk walking is included as part of the NHS recommended physical activity guidelines (https://www.nhs.uk/live-well/exercise/physical-activity-guidelines-for-adults-aged-19-to-64/). The field brings a moment of calm, an opportunity for reflection and some much needed headspace from our busy lives.
- Our village has a higher than average amount of people who are older, disabled, or unwell, and the Horse Field as their accessible green space. Removing it without replacing it may disproportionately harm vulnerable groups, which would breach the Equality Act 2010.
- 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.
- The field also provides me with a connection to my community, as we regularly see familiar faces on our walks and these interactions are vital for health and wellbeing, reducing social isolation and forming meaningful relationships (My loneliness is killing me: the devastating health effects of social isolation, Shankar R. Loneliness, Social Isolation, and its Effects on Physical and Mental Health. Mo Med. 2023 Mar-Apr;120(2):106-108. PMID: 37091945; PMCID: PMC10121112. https://pmc.ncbi.nlm.nih.gov/articles/PMC10121112/)
- Proposed compensation does not meet these needs in terms of accessibility or similarity, and would provide additional cost and mitigation requirements.
- 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.

Change Required

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

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

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

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

Evidence

- Being adjacent to the site and walking the field on a regular basis, I can confirm that there is significant groundwater and run off, on and around the site. With the field regularly waterlogged and run off occurring into adjacent land. This is not confined to the lower part of the field And the mid section of the footpath, along with upper parts of the field are regularly water logged.
- The Environment Agency has recently funded tree planting on site to act as natural flood mitigation. The SFRA identifies larger areas of the site with the potential for further planting. This not only illustrates the existence of a problem here, but also could affect site viability.

REQUIRED CHANGE

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

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

- We regularly see bats and barn owls on the site.
- Ecology report states requirement for a further detailed investigation of Protected Species.
- Ecology report recommended retention of some areas of grassland on site where possible.
- BNG does not currently include values for Protected Species or Watercourse

Changes Required

MMs should state that:

1. Further detailed assessment should be carried out for Protected Species present on site or very close to the site and BNG should be adjusted accordingly.

2. BNG for watercourse should be calculated.

3. Mitigations should be put into place for all identified Protected Species and their habitats including suitable buffers and light restrictions around forage areas and flight paths. This should apply to all habitats (bat roosts etc.) identified both on site and within close proximity to site.

4. Some areas of open grassland should be retained.

AND

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

Yours Sincerely,

Faye Costello

REF5.0391

Outlook

Sheffield Plan Consultation On Main Modifications For Site NWS31

From [redacted]
Date Tue 2026-05-05 11:01 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Planning Inspector,

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

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

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

The Council acknowledges that:

"The site is well used and valued by the local community as an informal area of natural greenspace, with formal and informal paths. It also provides connections to Glen Howe Park/Wood, Storth Lane and areas of 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 myself, my family and other local residents. I walk on The Horse Field every day with my dogs. It is an essential link to Glen Howe.

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

As previously mentioned, I walk across The Horse Field every day. During the winter months the field is water logged. The Environment Agency has recently funded tree planting on site to act as natural flood mitigation.

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

A proposed 100 houses and associated vehicles is going to cause numerous issues

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

BIODIVERSITY *(MM332 condition points 8,9,10)*

I have personally seen a wide range of animals and birds on The Horse Field including deer, rabbits, stoats, toads, owls, buzzards and bats. I believe a further detailed assessment is required to fully appreciate the biodiversity on The Horse Field.

Yours sincerely,

Elizabeth Costello

[redacted]

Sent from my iPhone

REF5.0392

Outlook

Main Modifications Consultation Response – MM351 (NES37)

From [redacted]
Date Tue 2026-05-05 11:07 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Local Plan Team

Personal Representation

I am writing to strongly object to the proposed allocation of **Site NES37 (Land between Creswick Avenue and Yew Lane)** within the Sheffield Local Plan.

My objection is based primarily on highway safety, traffic congestion and flood risk, all of which directly affect my daily life and my family.

1. Personal Impact and Highway Safety

I live on [redacted] where Wheel Lane becomes particularly narrow, with restricted visibility and limited space for vehicles to pass safely. From my own daily experience, this stretch of road already presents significant challenges when pulling in and out of my property.

At many points along this road, it is so narrow that vehicles cannot pass each other safely without one stopping or mounting the opposite side of the carriageway or in some cases the curb. This creates an extremely hazardous environment for pedestrians.

I have personally experienced and witnessed situations where:

- Pedestrians are forced to walk in single file due to narrow footways or in the road, particularly with prams or wheelchairs as the paths are not wide enough
- Vehicles regularly cross the centre line or mount the opposite side of the road to pass
- People, including children, have been clipped by wing mirrors due to the proximity of vehicles

This is not a theoretical risk, it is already happening. In my view, it is only a matter of time before a serious injury occurs, particularly a head injury, given how close vehicles pass to pedestrians and the speeds the vehicles are travelling.

2. Dangerous Road Conditions and Recorded Incidents

I have also witnessed a number of accidents on this stretch of road. Of particular concern is:

- A designated disability parking space located directly opposite a blind bend, on a narrow downhill section of the road
- This is in close proximity to one of the proposed access points to the NES37 site

Vehicles regularly approach this section at speed, particularly as it is downhill on a fairly wide stretch of road, and visibility is extremely limited. This creates a high-risk conflict point between:

- Parked vehicles
- Oncoming traffic
- Vehicles attempting to access or exit the proposed development

In addition:

- Although the road is subject to a 30mph limit, speeding is extremely common
- The Council has already introduced traffic calming measures, which in itself demonstrates that speeding is a known issue
- Despite restrictions, HGVs and large vehicles regularly use this route as a shortcut, rather than using more appropriate routes such as Yew Lane

These vehicles are wholly unsuitable for such a constrained road and further increase the risk to pedestrians and other road users.

3. Impact on Children and School Traffic

The situation is significantly worse during peak periods, particularly the school run.

[redacted] At these times:

- Traffic levels increase substantially
- Roads become heavily congested
- Pedestrian safety is further compromised and again there have been a number of accidents both cars and children on this stretch of road

Children walking to and from school are already exposed to:

- Narrow or obstructed footways
- High traffic volumes
- Unsafe crossing conditions

Introducing a development of this scale would intensify these risks significantly, and the Plan does not demonstrate how this can be made safe. This raises serious safeguarding concerns, as the current and proposed conditions fail to demonstrate how children can travel to and from school safely. The absence of clear, evidenced mitigation is unacceptable given the duty to protect vulnerable road users.

4. Traffic and Cumulative Impact (Including NES39)

NES37 cannot be considered in isolation. It forms part of a wider cluster of allocations, including NES39 - MM353, which lies further along the same road. Traffic from both sites would feed into the same constrained network.

There is no robust cumulative assessment of these combined impacts. The available evidence highlights:

- Existing congestion across the network
- Lack of reliable traffic modelling
- No clear or deliverable mitigation strategy

Given the current conditions, it is clear that the local road network is already operating beyond a safe and reasonable capacity.

5. Flood Risk and Drainage

Flooding is another major concern. The site contributes to a wider drainage system affecting downstream areas such as Ecclesfield. Evidence identifies:

- Existing surface water and drainage issues
- No cumulative flood risk assessment
- Reliance on future mitigation rather than demonstrated solutions

From my own direct experience as a resident on The Wheel, these issues are already evident on the ground. The section where I live runs downhill, levels out, and then falls again, creating a natural low point where water collects. During periods of heavy rainfall, this area effectively behaves like a localised floodplain.

The underlying soil is clay-based, meaning it does not absorb significant rainfall. As a result, surface water accumulates quickly and places pressure on already limited drainage infrastructure. I have personally had to spend a significant amount of money installing additional drainage around my property in order to manage water runoff and prevent damage.

This is not a theoretical concern, it reflects the natural characteristics of the land and existing drainage constraints in this area.

The proposed development at NES37 would introduce extensive areas of hard surfacing, which would:

- Increase surface water runoff
- Reduce natural infiltration

- Place additional pressure on an already constrained drainage system

Despite this, there is no clear evidence that these cumulative impacts have been properly assessed or that effective, deliverable mitigation can be achieved.

It is not acceptable to allocate a site of this scale without clear evidence that flood risk can be properly and sustainably managed, particularly where existing problems are already being experienced by residents.

The National Planning Policy Framework is clear that "development should not increase flood risk elsewhere" (paragraph 173) and should be "safe for its lifetime without increasing flood risk elsewhere" (paragraph 174). In this case, there is no evidence to demonstrate that these requirements can be met and in fact personal experience show this to not be able to be justified.

In these circumstances, the proposal fails to demonstrate that it is justified, effective, or consistent with national policy in relation to flood risk.

6. Unsustainable Location

The site performs poorly in terms of sustainable transport and would be heavily reliant on the private car.

Given the constraints of the surrounding road network, this would inevitably:

- Increase congestion
- Worsen safety conditions
- Conflict with national policy on sustainable development and net zero emissions

7. Conclusion

Based on both the technical evidence and my direct experience as a resident, I do not believe this site can be developed safely or sustainably.

In particular:

- The road network is already unsafe in places, with real-world incidents occurring
- Pedestrians, including children, are already at risk, with documented near misses and collisions
- Additional traffic would significantly worsen an already dangerous situation
- The cumulative impact, including NES39, has not been properly assessed
- The site would be heavily car-dependent
- Flood risk remains unresolved, with no cumulative assessment and reliance on unproven mitigation. This conflicts with the NPPF (paragraphs 173–174), which requires that development does not increase flood risk elsewhere and is safe for its lifetime.

I respectfully request that Site NES37 is removed from the Sheffield Local Plan.

Kind Regards,

Gill Travis and Roy Ritchie

REF5.0393

Outlook

S13 green belt

From [redacted]
Date Tue 2026-05-05 11:11 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

1 attachment (7 KB)
Sheffield Plan Response May 2026.odt;

External email

Sheffield planner

Please find my comments attached.

Thanks
Diane Ramsden

Dear Sir /Madam

Firstly, I would just like to comment on the complexity of the Sheffield Plan: List of Updates to the Main Modification Consultation Documents (for Documents Republished on 23rd March 2026). It feels as though the more complex Sheffield planners make the additions to the original document; the less people will be able to challenge and engage with the consultation.

The vision for The Sheffield Plan Feb 2026 indicates thriving neighbourhoods and communities, with distinct urban and rural identities, which is the current situation. Instead, the proposed houses in S13 will lead to an urban sprawl, with no distinct identity, destroying our communities, along with the removal of our beautiful greenbelt and leaving us with no rural area for the wildlife and no place for families to enjoy.

I will make my response short, the thought that S13 green belt as depicted in the Sheffield Plan and subsequent MM410 and MM411will be destroyed, without looking at available brown belt throughout the city, there are vacant, derelict and underused areas. Also, there are council owned houses still standing empty is beyond comprehension that S13 greenbelt could be considered before exploring other options.

I cannot see how an already very busy road, with queues daily is deemed suitable for access to SE30 site. This will have a huge negative impact on our residents, and the Sheffield planners do not seem to care of the carnage it will cause.

There does not appear to be any evidence to support a new school or the multifaith burial site. Only more houses in one single post code, causing further disruption.

The plan is unsound and I request it is removed from the plan and is kept in its original state as green belt.

Diane Ramsden
[redacted]

REF5.0394

Outlook

Response to Main Modifications MM411

From [redacted]
Date Tue 2026-05-05 11:30 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

1 attachment (17 KB)
FOSV OBJECTION .docx;

External email

Please acknowledge receipt of this attachment.

Kind regards Gary Smelt

[redacted]

4th May 2026

REGARDING SES30, MM411

To whoever it may concern.

We write to object to the main modifications set out for the S13 site MM411 (SES30) as we do not believe the required tests that the inspector must apply have been met. It is our belief these proposals remain unsound for multiple reasons but we wish to concentrate here on the very real threat of damage being caused to the Ancient Woodland.

The edge of the woodland adjacent to the proposed development area displays clear indications of ecological sensitivity. There are mature ivy-clad trees, deadwood, uneven natural ground conditions and diverse ground flora abundant with Ancient Woodland indicator species.

These characteristics are consistent with long established woodland ecosystems which are highly sensitive to change and slow to recover from the type of disturbance they are being threatened by, and yet, there is no acknowledgment in Sheffield City Councils (SCC) Main Modifications about how these risks will be addressed. MM411 seeks to strengthen policy wording relating to ecology, buffers and mitigations but by the council's own assessment the modified plan is worse for the environment especially where indirect impacts are concerned. These conclusions are based on SCC own evidences set out in Integrated Impact Assessment, Non-Technical Summary, pge 16.

The site boundary abuts areas of steeply sloping woodland which creates significant risk that any development here will alter natural drainage patterns resulting in increased water run-off, erosion of soil and alter the nutrient rich soil in the Ancient Woodland. These factors are known to result in the deterioration of Ancient Woodland Habitats.

A 15mtr buffer is a minimum standard – there are no fixed or sufficient distances which can be applied in all circumstances. Given the steeply sloping topography and existence of only partial scrub along the Ancient Woodland edge which is already under pressure from walkers, cyclists and runners, 15mtr at this location will not prevent harmful and indirect effects. The main modifications do not show how damage will be avoided, and this is at conflict with National Planning Policy for Ancient Woodland and should therefore be refused.

Furthermore if private gardens were to lie at the edge of any proposed buffer zone, damage caused by long term impacts would be exacerbated through encroachment, vegetation clearance and unmanaged access which again renders the plan and the main modifications set out to be unsound.

The Environment Act requires SCC to show how a 10% net gain in biodiversity will be achieved for SES30 yet they have failed to do so. The ecological assessment undertaken by the council suggested that the site could be used for natural biodiversity schemes instead of housing development – a very valid point which they have chosen to ignore. No protected species surveys were undertaken before the site was allocated, yet we have direct and irrefutable evidence of the magnificent flora and fauna which have made their homes at this location.

Evidence is available and has been offered in support of the community objections but there have been no requests made to date to view this.

The compensatory improvements which have been suggested refers to potential improvements around rights of way in the local area such as Shirtcliffe Valley– Friends of Shirtcliffe Valley are against these suggestions. We consider that MM411 has not improved the soundness of the plan which continues to lack signs of being positively prepared, remains unjustified, will not be effective and is still totally inconsistent with National Policy.

Members of our group retain significant concerns about the process in general. We do not believe that the community have been afforded the respect they deserve, neither have their views been heard or their concerns addressed as they should have been.

We therefore request that site SES30 be removed from the Local Plan and retain it's green belt status.

Additionally we request to be notified of the final report and adoption of the plan.

For and on behalf of Friends of Shirtcliffe Valley

Sue Smelt Acting Chairperson

REF5.0395

Outlook

Luke Goddard Objection in relation to SS19

From [redacted]
Date Tue 2026-05-05 11:48 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Please accept this most recent email as my objection, with the specific reference to SS19 in the opening paragraph.

Dear Strategic Planning Team,

I submit this representation in relation to the proposed Main Modifications to the Sheffield Local Plan, with specific focus on those modifications which impact site SS19.

I have previously submitted representations to the Local Plan and participated in the examination hearings. I remain concerned that a number of the issues raised by residents and participants in that process have not been adequately addressed through the proposed modifications.

In addition to my prior involvement, I have engaged extensively with residents across the Birley ward. A consistent concern raised is that the Local Plan, as currently proposed and modified, does not command public confidence and fails to respond sufficiently to the issues identified during consultation and examination.

While I note that modifications have been made, these changes do not, in my view, resolve the fundamental concerns regarding the Plan's approach. In particular, there remain significant issues relating to the treatment of Green Belt land and the justification for its release.

I believe the proposed main modifications do not meet the tests of soundness set out in Paragraph 36 of the National Planning Policy Framework (NPPC), 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,

Luke Goddard
[redacted]

REF5.0396

Outlook

Objection to MM410 and MM4

From [redacted]
Date Tue 2026-05-05 11:51 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Good morning,

I am writing to submit a further objection to the proposed release of Green Belt land at the Bramley / Beaver site (SES30) and Finchwell Road (SES29) as part of the Sheffield Local Plan. This submission builds upon my original objection (ref 1.1143), which remains unchanged in its core concerns, but also includes additional information and a further point for consideration.

For clarity and completeness, I have summarised the key points of my original objection below (with the full points included within an appendix) before outlining the additional matters in this updated submission.

Summary of Previous Objection

In my original objection, I raised significant concerns regarding the proposed development of Green Belt land in S13, particularly in relation to the disproportionate impact on the area, the adequacy of infrastructure, and the consequences for health and wellbeing.

A central concern was the unequal distribution of Green Belt release across Sheffield, with approximately 44% proposed within S13 alone, resulting in the loss of over 95% of the area's Green Belt. I argued that this appears inconsistent with national planning policy, which requires all reasonable alternatives to be fully explored before altering Green Belt boundaries.

I also highlighted the likely increase in air pollution from additional housing and traffic, noting that the area already exceeds recommended air quality limits. This raises serious concerns about public health, particularly for children and those with respiratory conditions, and the potential knock-on effects on school attendance and NHS services.

Concerns were also raised about infrastructure limitations, including existing flood risks at the SES30 site and traffic congestion on the A630 Parkway. I argued that the proposals do not adequately address these constraints.

The loss of Green Belt land was further identified as having a significant negative impact on mental health and wellbeing. Access to local green spaces plays an important role in supporting physical activity, emotional wellbeing, and community cohesion, and their removal would disproportionately affect local residents.

In addition, I emphasised the importance of these green spaces for children's development, education, and long-term health, particularly in the context of national priorities around

prevention, physical activity, and mental wellbeing.

I also raised concerns about the planning process itself, noting that SES30 was introduced at a late stage with limited communication to residents, which appears inconsistent with the Council's stated principles for community engagement.

Finally, I expressed concern regarding the proposal for a new secondary school in close proximity to an existing one, particularly in light of existing safety concerns and rising incidents within schools locally.

Overall, my objection concluded that Site SES30 should be removed from the Local Plan, and that further justification is required for Site SES29, due to the cumulative impacts on the environment, infrastructure, public health, and community wellbeing.

New Concern

Recent primary school admissions data for the September 2026 intake provides further evidence that the S13 area is already experiencing significant pressure on school places, demonstrating a clear misalignment between housing growth and supporting infrastructure.

The impact of the nearby Waverley development is particularly relevant in this context. While this development falls predominantly within the Rotherham local authority boundary, insufficient primary school capacity within that area has resulted in increased cross-boundary applications to schools within Handsworth (S13). Due to the operation of admissions criteria based on proximity, some of these properties are geographically closer to Sheffield schools than addresses within S13 itself. Consequently, school places are being allocated to out-of-area applicants ahead of children residing within the local community.

This has resulted in oversubscription at multiple local primary schools, to the extent that sibling link allocations are no longer being consistently met. I am aware of several cases where younger siblings have been unable to secure places at the same school as older siblings. This is occurring despite the September 2026 cohort being a comparatively low birth year, and notwithstanding Sheffield local authority statements regarding high levels of first-preference allocations across Sheffield. These aggregate figures do not accurately reflect the acute and localised pressure within S13.

From a policy perspective, this raises significant concerns regarding compliance with the principles set out in the National Planning Policy Framework, particularly:

The requirement to ensure that sufficient infrastructure is in place to support development (including education provision);
The presumption in favour of sustainable development, which requires that growth is appropriately supported by necessary services and facilities;
The obligation to plan positively for the provision of community infrastructure, including schools.
The current situation demonstrates that existing education infrastructure is already operating beyond capacity. The addition of further large-scale housing development, without clearly evidenced and deliverable plans for school place expansion, would exacerbate this issue and is therefore inconsistent with sustainable planning principles.

In practical terms, the lack of available school places is already placing financial and logistical burdens on families, who are being required to manage children attending different schools. This

often necessitates additional paid childcare provision, such as breakfast and after-school clubs, and creates disproportionate impacts on families in areas of existing deprivation. These outcomes are contrary to objectives around social equity and inclusive growth.

Furthermore, the removal of accessible Green Belt land must also be considered in this context. The National Planning Policy Framework emphasises the importance of supporting healthy, inclusive communities. The loss of local green space reduces opportunities for informal recreation and stress relief, which is particularly significant for families already experiencing increased daily pressures due to infrastructure constraints.

Taken together, this evidence indicates that the cumulative impact of existing development, cross-boundary demand, and insufficient infrastructure provision has not been adequately addressed. Proceeding with further Green Belt release in S13, without first resolving these issues, would be inconsistent with national planning policy and would further undermine the sustainability of the area.

Overall, my updated objection still concludes that Site SES30 should be removed from the Local Plan and remain Greenbelt, and that further justification is required for Site SES29.

Thank for for considering my objection, I would be grateful to receive an acknowledgement.

Rebecca Allen

Appendix containing detail of Previous Concerns – REF 1.1143

There is a clear disproportionate spread across the city
44% of the green belt land being proposed across Sheffield is within S13 alone, the proposal would result in S13 losing over 95% of our green belt. This comes shortly after the Waverley estate has been built nearby. I am unclear how and have not yet seen any evidence which clearly demonstrates how other areas across Sheffield have been considered, and why the disproportionate 44% has to come from S13. I strongly believe this contradicts the National Planning Policy Framework rule which states that when planning decisions, authorities must fully examine all other reasonable options for meeting the development needs, before justifying changes to green belt boundaries through exceptional circumstances.

The Health Equity Panel Report commissioned by South Yorkshire's Mayor in June 2025 outlines 10 fundamental aspirations that people in South Yorkshire should expect throughout their lifespan in order to; tackle the "deep and unacceptable health inequalities that hold South Yorkshire back" and "make South Yorkshire the healthiest region in the country". I believe that the current proposals directly contradict the following aspiration in the HEP report;

· Number 4: Live in decent quality housing that is affordable, and in a pleasant neighbourhood that supports wellbeing

Particularly the quote on page 20; "Improve the quality of, and access to, existing green spaces and prioritise the provision of new green spaces in areas of high deprivation and as conditions for new developments to support wellbeing"

The proposals to take away over 95% of S13's green belt for new development does not improve the quality of and access to green space for the S13 residents of South Yorkshire, it eliminates them.

Increased air pollution



Quoted from the Sheffield City Council website (https://www.sheffield.gov.uk/clean-air-zone-sheffield/clean-air-zone-air-quality-data); "With 1 in 20 deaths in the city being due to poor air quality, we must all act to protect the health of ourselves, our loved ones and the environment around us." The current air pollution levels in Handsworth are already above healthy limit; the Governments National Air Quality Plan has already identified the A630-A57 Parkway from M1 Junction 33 to the City Centre as breaching No2 limits. Since traffic is the main polluter, adding c.1,700 more houses which will come with thousands more vehicles in the nearest postcode, in addition to removing its green spaces, will worsen this for S13 and negatively impact on local people's health. This will in turn place further strain on the wider NHS and local S13 services.

The Department for Education's 2022 School Attendance Guidance outlines that "Central to raising standards in education and ensuring all pupils can fulfil their potential is an assumption so widely understood that it is insufficiently stated – pupils need to attend school regularly to benefit from their education. Missing out on lessons leaves children vulnerable to falling behind. Children with poor attendance tend to achieve less in both primary and secondary school". The current proposals to build within S13 will not only negatively impact on children's health but it will also in turn impact on their education and ability to fulfil their future potential, through missing school due to illness.

3. Current infrastructure is not equipped to deal with additional housing

Having lived near Beaver Hill Road for the majority of my childhood, I know how bad the flooding in 'the dip'– at the bottom of the SES30 site – can be, it cuts off communities. Taken from the Environment Agency Flood Map for Planning (Map – Flood map for planning – GOV.UK) this area is already considered a category 3 flood risk. There is widespread disruption when there is heavy rainfall. When I took my GCSEs, Handsworth Grange School had to get permission from the exam boards to allow students at our school to start our exams on that day later than the rest of the country as children were physically unable to get to school on time due to the flash flooding that had happened. Cars and buses were unable to get through, in the end students were wading through the water giving each other 'piggy backs' to get to school in order to complete their exams. Building on the SES30 site would exacerbate this problem further. I therefore believe the proposals also directly contradict the National Planning Policy Framework (NPPF) rules which authorities must follow as below;

· Section 14 – meet the challenge of flooding

The traffic on the Handsworth parkway (A630) is already overstretched and at times dangerous. Outside of rush hour traffic I can get into town within 15 minutes, however in a morning after the school run it takes me 35-45 minutes to get to work in the town centre. Further housing

developments will add even more time onto this commute and make school drop off before getting to work increasingly difficult.

The impact on my mental health
Sheffield City Council's Green and Open Space Strategy (2010-2030) commits to ensuring equitable access to green space for all residents, recognising its essential role in health, wellbeing, social inclusion and environmental quality. Proposing to take away over 95% of S13's greenbelt directly contradicts this strategy. During lockdown both the SES30 and SES29 sites were invaluable places that I would walk with my newborn in a pram and my dog whilst on maternity leave to get some well need fresh air and exercise. I have recently been through a rough time personally and the benefit of having access to local green areas for dog walks cannot be measured or quantified and has been recommended by my GP to help my mental health problems. Taking the majority of our greenbelt away will worsen the inequalities we face, and further increase the burden on NHS services.

To use a quote taken from a Grey to Green plaque in Sheffield city centre "There's evidence that being around nature can make us happier, healthier people." It seems odd to me that we have initiatives partly funded by Sheffield City Council which "offers a calm refuge …. a green public space that encourages cycling and walking" but the same Council has other simultaneous plans to take away over 95% of S13's green public space, discouraging our residents to access their local green spaces to cycle and walk, instead forcing them to drive to other green spaces to cycle and walk.

I believe the proposals also directly contradict the National Planning Policy Framework (NPPF) rules which authorities must follow as below;

· Section 8 – promoting health and safe communities by enabling and supporting people to love healthy lives through access to green spaces.

· Section 13 - protecting greenbelt land to prevent neighbouring towns merging into one anoher.

· Section 15 - planning policies should protect and enhance valued landscapes and recognise the benefits of access to the natural environment for people's health and well-being.

It will take away my children's opportunity to access local green spaces

The 10 Year Health Plan for England released in July 2025 outlines the need to focus on predicting and preventing ill health rather than simply diagnosing and treating it. It highlights the growing childhood obesity problem and that early priorities will include cardiovascular disease, mental health, frailty and dementia.

There are numerous pieces of research outlining the benefit that nature has on our mental and physical health. The Mental Health Foundation website (Nature: How connecting with nature benefits our mental health | Mental Health Foundation) outlines "how much we notice, think about and appreciate our natural surroundings – is critical in supporting good mental health and

preventing distress". The World Heart Federation website (https://world-heart-federation.org/what-we-do/prevention/) outlines that one of the four main elements of Cardio Vascular Disease prevention is physical activity (the others being healthy diet, avoiding tobacco and knowing your numbers).

Taking away our children's access to green spaces where they can run, do cartwheels, ride bikes, walk the dog, explore nature, see old trees, smell the flowers, listen to birds and take in their surroundings, takes away their opportunity for free exercise, to experience the mental health benefits of nature, and generally learn about the world around them. Shirtcliff Valley is a key area I used to visit on school trips as a child and remains an area within walking distance that local schools continue to visit to enhance their science and geography studies. I'm aware that local nursery settings also use the green spaces during warmer months to provide the youngest children in our community the opportunity to explore nature.

Going back to the Health Equity Panel Report commissioned by South Yorkshire's Mayor in June 2025. I believe that the current proposals also directly contradict the following aspiration in the HEP report;

· Number 3: Be well educated, skilled and able to contribute to society as well as their own development.

Particularly the quote on page 19 "address worsening mental health and wellbeing among children and young people, and identify ways to tackle this at scale".

The proposals to take away over 95% of S13's green belt for new development does not address the worsening mental health and wellbeing of the S13 children of South Yorkshire. It further worsens it. When I asked my 5 year old son if our local green space was not here anymore, his response was "If the fields disappear it will make me really sad because we won't be able to walk (our dog) there anymore".

The sites were added to the proposal late on in the process, and were not clearly communicated to affected residents
The Sheffield City Council's Statement of Community Involvement (SCI) from 2020 outlines that communities should be consulted at the earliest opportunity, that the council will encourage involvement in planning, and will ensure equality to assist people in getting involved. SES30 was not added to the plan until April 2025, well after the earlier consultation stages. Local residents were not notified of any proposals until late on in the process, without any Regulation 18 consultation on the Green Belt release. And these late communications were only released online.

The people of S13 did not receive adequate time to understand, nor communicate the proposals within our community. I personally found out about this on a local Facebook group, on a post from a local resident. The only paperwork I have had through the door is from a local group rallying to raise awareness of the proposals. The whole approach directly contradicts many of the key principles in Sheffield City Council's own Statement of Community Involvement.

I am concerned with the proposal to build a second secondary school so close to the existing Handsworth Grange School
School rivalries are a longstanding and generational issue. Combined with the recent escalating violence that is being seen in schools, it makes me very anxious that students from schools so close together will be walking home along the same paths.

The BBC released a report (www.bbc.co.uk/news/articles/cy839mln97lo) which indicated that “more than 100 cases of children taking knives into South Yorkshire schools have been recorded over the past three years, according to police figures”, which were obtained following a freedom of information request. This is a disturbing figure in itself, before potentially building another secondary school less than a mile away from the current secondary school serving S13.

Yahoo Mail: Search, organise, conquer

REF5.0397

Outlook

Objection to Sheffield Plan - Main Modifications

From [redacted]
Date Tue 2026-05-05 11:52 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Planning Officer and Planning Inspector,
I write further to my previous emails and attachments objecting to the Sheffield Local Plan proposals (SES29 and SES30) to confirm my objections on the grounds I previously stated. I have found no changes in the proposals which would alter the basis of my objections submitted to date and I request the sites concerned are removed from the Plan and kept as Green Belt.

It is apparent that all objections made by affected residents to date have been ignored or dismissed and where inaccuracies have been pointed out in statements made by the City Planners at the hearings, such as claiming land no longer serves the purpose of Green Belt, these have never been acknowledged or addressed.

I am disappointed the flooding issues referred to at Catcliffe were never taken seriously and were never even included in the agenda for specific discussion at the hearing of 13 October 2025.

As stated during the hearing of 13 October 2025, the proposed access arrangements to the Handsworth Hall Farm site (SES29) had radically changed which strongly affects other residents around the site. In Handsworth we are therefore presented with a new plan, for which I requested a full new consultation, however we again appear to have been ignored.

In clause 3.11 of my "Comments on Second Consultation", dated 11 December 2025, I pointed out there was still no Transport Assessment, as had been promised at the hearing, taking account of the changed access arrangements. I note you have continued to ignore concerns such as this.

When I called at local houses recently about signing a petition, I found a 100% success rate in obtaining signatures of objection from anyone I caught in (about 80 people) – This sample appears to demonstrate the strength of feeling in the community against the proposals if and when people find out about them.

Kind regards

Peter Sorby
[redacted]

REF5.0398

Outlook

Objection to Sheffield Plan SES30 Ref1.2093

From [redacted]
Date Tue 2026-05-05 12:10 PM
To [redacted]

External email

To whom it may concern,I submit my further objections to the Sheffield plan relating to SES30.

I am commenting on main modification MM411 (SES30). I consider this to be unsound. As part of the Environment act 2021, all new developments are legally required to supply a minimum of 10% Biodiversity Net Gain (BNG). Sheffield Council have failed to show how this can be achieved on SES30 with no mention of it in MM411. The councils ecological assessment assigns high importance to this area. They have suggested it could be registered as a BNG site on the national register. This is in direct contrast to what the council are now proposing. An ecological appraisal published months after the decision to allocate the sites and reports the protected species surveys should have been completed before a decision to put the site forward. The documents provided do not give evidence of the required 10% BNG nor an impact assessment on wildlife.

I consider Main modification MM411 (site SES30) to unsound. It is not justified and not consistent with national policy. I request the SES30 be removed from the plan and retained as green belt.

Please notify me of the Inspector's report and the adoption of the Plan

Regards

Jake Ramsden

REF5.0399

Outlook

Sheffield Plan Main Modifications Consultation - NGET Response

From [redacted]
Date Tue 2026-05-05 12:22 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

1 attachment (2 MB)
Sheffield Plan Main Modifications Consultation - NGET Response.pdf;

External email

Dear Sir / Madam,

Sheffield Plan Main Modifications Consultation March – May 2026
Representations on behalf of National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission (NGET) has appointed Fisher German LLP to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the attached representation with regard to the current consultation on the above document.

If you require any further information in respect of this letter, then please contact us.

Kind Regards,

Bradley

fisher german

Fisher German LLP
The Estates Office
Norman Court
Ashby de la Zouch
LE65 2UZ

[redacted]

Our Ref: 105181-024

05 May 2026

Sheffield City Council
sheffieldplan@sheffield.gov.uk
via email only

Dear Sir /Madam,

Sheffield Plan Main Modifications Consultation March – May 2026
Representations on behalf of National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission has appointed Fisher German LLP to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. NGET manage not only today's highly complex network but also to enable the electricity system of tomorrow. Their work involves building and maintaining the electricity transmission network – safely, reliably and efficiently. NGET connect sources of electricity generation to the network and transport it onwards to the distribution system so it can reach homes and businesses.

National Grid Electricity Distribution (NGED) are the electricity distribution division of National Grid and are separate from National Grid Electricity Transmission's core regulated businesses. Please also consult with NGED separately from NGET.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

National Energy System Operator (NESO) has taken over the electricity and gas network planning responsibility from National Grid Electricity System Operator Limited (NGESO) as of 1st October 2024. Early engagement with NESO is recommended in order to establish available supply capacity to any potential development sites and what, if any, reinforcement is required to ensure adequate continued supply. Please consult with NESO separately from NGET.

Proposed development sites crossed or in close proximity to NGET assets

Following a review of the above Main Modifications, we have identified that one or more proposed development sites are crossed by or in close proximity to NGET assets. Details of the sites affecting NGET assets are provided in the following table.

Fisher German LLP is a limited liability partnership. Registered in England and Wales. Registered Number: OC317554. Registered Office: The Head Office Ivanhoe Office Park, Ivanhoe Park Way, Ashby-De-La-Zouch, Leicestershire, England, LE65 2AB. A list of members' is available for inspection at Head Office.

Regulated by RICS

RTPI Chartered

bmtrada UKAS MANAGEMENT SYSTEMS 30691

bmtrada UKAS MANAGEMENT SYSTEMS 0012

Development Plan Document Site	Asset Description
Policy SA2 – Site Allocation NWS04 - Allotments to the south of Wardsend Road North (MM321)	YYO ROUTE TWR (001 - 039): 400Kv Overhead Transmission Line route: EGGBOROUGH - NEEPSEND - STOCKSBRIDGE
Policy SA2 – Site Allocation NWS05 - Land to the northwest of Wardsend Road (MM322)	YYO ROUTE TWR (001 - 039): 400Kv Overhead Transmission Line route: EGGBOROUGH - NEEPSEND - STOCKSBRIDGE
Policy SA5 – Site Allocation SES03 - Land to the east of Eckington Way (MM392)	ZBB ROUTE: 275Kv Overhead Transmission Line route: BRINSWORTH - JORDANTHORPE
Policy ES7 – Safeguarded Minerals Site - Asphalt plant, Woodside Depot, Rutland Street, Sheffield (MM122)	Cable: YYP005 – SHEFFIELD CITY CABLE SECT: 08 CABLE ROUTE: NEEPSEND - SHEFFIELD CITY Cable: YYP005 – PITSMOOR CABLE SECT: 03 CABLE ROUTE: NEEPSEND - PITSMOOR

A plan showing details of NGET assets is attached to this letter. Please note that this plan is illustrative only. NGET also provides information in relation to its assets at the website below.
https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/network-route-maps

NGET Electricity Network Infrastructure

The security and reliability of the UK's current and future energy supply is highly dependent on having an electricity network which will enable the existing and new electricity generation, storage, and interconnection infrastructure that the country needs to meet the rapid increase in electricity demand required to transition to net zero, while maintaining energy security.

In general, NGET does not own the land crossed by its overhead lines but has responsibility for maintaining the equipment and safe supply of electricity. The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by NGET assets.

Despite this NGET is not a statutory consultee in the plan-making process but it is recommended that NGET are consulted at the earliest possible opportunity in order that advice and guidance can be taken into account on development near overhead lines, or wider policies that may affect the existing or future supply of electricity.

With the above context in mind, the Council should ensure that development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement or future network expansion. The Council should safeguard existing and potential access routes required for the delivery and removal of Abnormal Indivisible Loads (AILs) associated with the construction, replacement and maintenance of transmission-scale equipment, including large transformers at strategic substations and resist development or highway alterations that would prejudice, constrain or render impractical AIL access unless suitable mitigation or alternative agreed routes can be secured.

Fisher German LLP is a limited liability partnership. Registered in England and Wales. Registered Number: OC317554. Registered Office: The Head Office Ivanhoe Office Park, Ivanhoe Park Way, Ashby-De-La-Zouch, Leicestershire, England, LE65 2AB. A list of members' is available for inspection at Head Office.

Interactions Commentary – Policies SA2, SA5 and ES7

NGET advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines and other NGET assets.

With the above in mind, NGET would like to provide its strong support for inclusion of wording to support delivery of site allocations NWS04, NWS05 & SES03 (Main Modifications 321, 322 and 392 respectively). We support the explicit recognition of the presence of NGET assets within the sites, and specifically a requirement of the policy for a strategy to be produced which responds to those assets and demonstrates how the NGET Design Guide and Principles have been applied at the master planning stage and how the impact of the assets has been reduced through good design.

Ultimately, without this acknowledgement and requirement, we consider that the associated allocations derived from SA2 and SA5 would not be effective as they could not be delivered as proposed; unencumbered by the constraints posed by the presence of NGET infrastructure.



Figure 1: OHL interaction with existing Site Allocations NWS04, NWS05

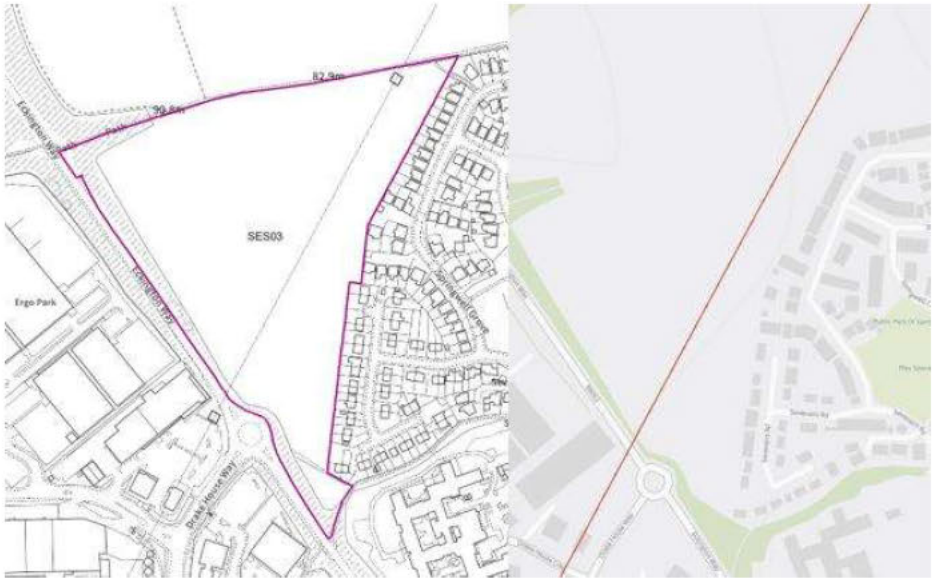


Figure 2: OHL interaction with existing Site Allocation SES03

Fisher German LLP is a limited liability partnership. Registered in England and Wales. Registered Number: OC317554. Registered Office: The Head Office Ivanhoe Office Park, Ivanhoe Park Way, Ashby-De-La-Zouch, Leicestershire, England, LE65 2AB. A list of members' is available for inspection at Head Office.

Policy ES7 – Safeguarded Minerals Site - Asphalt plant, Woodside Depot, Rutland Street, Sheffield (MM122)

Whilst we acknowledge the limited scope of a Main Modifications consultation, we also note that an additional safeguarding site which interacts with NGET assets has been added to Policy ES7 via MM122. NGET propose that similar wording to that referred to above be added to Policy ES7 to ensure it too appropriately recognises and responds to the presence of NGET infrastructure within the site . Wording to the following effect (*red italics*) could be added:

"Development on safeguarded sites (or potential future sites providing comparable facilities) will be acceptable if it can be demonstrated:

f) that development proposals have included a strategy for responding to the National Grid Electricity Transmission underground cable assets present within the Asphalt Plant, Woodside Depot site which demonstrates how the National Grid Electricity Transmission Design Guide and Principles have been applied at the design stage and how the impact of the assets has been reduced through good design"

Without this acknowledgement and requirement, MM122 and as a result policy ES7 would not be effective as it could not be delivered as proposed; unencumbered by the constraints posed by the presence of NGET infrastructure within the Asphalt Plant, Woodside Depot site.



Figure 3: Underground Cable interaction with Safeguarded Minerals Site referred to

New Infrastructure

Demand for electricity is expected to rise significantly as the way we power homes, businesses and transport evolves. As the UK transitions towards net zero, fossil fuels will be replaced by increasing volumes of low-carbon electricity, including from offshore wind and other renewable sources.

The UK Government has committed to achieving net zero emissions by 2050, requiring a balanced approach to greenhouse gas emissions and removals. Decarbonising the energy system is central to meeting this national objective.

National Grid Electricity Transmission (NGET) is delivering a range of infrastructure projects across England and Wales to support this energy transition and ensure that the transmission network can accommodate the rapid growth in low-carbon generation.

Fisher German LLP is a limited liability partnership. Registered in England and Wales. Registered Number: OC317554. Registered Office: The Head Office Ivanhoe Office Park, Ivanhoe Park Way, Ashby-De-La-Zouch, Leicestershire, England, LE65 2AB. A list of members' is available for inspection at Head Office.

The way NGET generates electricity in the UK is changing rapidly, and NGET are transitioning to cheaper, cleaner and more secure forms of renewable energy. NGET need to make changes to the network of overhead lines, pylons, cables and other infrastructure that transports electricity around the country, so that everyone has access to clean electricity from these new renewable sources. These changes include a need to increase the capability of the electricity transmission system between the North and the Midlands, and between the Midlands and the South. It is also needed to facilitate the connection of proposed new offshore wind, and subsea connections between England and Scotland, and between the UK and other countries across the North Sea. Taking this context into account, In planning for the area the Council should:

- **Safeguard all existing NGET transmission assets**, including overhead lines, underground cables and substations.
- **Support future reinforcement and expansion**, including works required for the Great Grid Upgrade and other strategic national infrastructure projects.
- **Ensure development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement, or future network expansion.**
- **Safeguard existing and potential access routes** required for the delivery and removal of Abnormal Indivisible Loads (AILs) associated with the construction, replacement and maintenance of transmission-scale equipment, including large transformers at strategic substations.
- **Resist development or highway alterations that would prejudice, constrain or render impracticable AIL access**, unless suitable mitigation or alternative agreed routes can be secured.
- **Encourage early engagement with NGET** to identify and resolve any potential impacts at the earliest possible stage of the planning process.

Protecting existing assets and enabling future network development will ensure that the Council contributes effectively to national decarbonisation targets while supporting local growth, resilience and energy security.

Brinsworth to High Marnham (DCO)

Notwithstanding the scope of this consultation, NGET would like to raise awareness of the Brinsworth to High Marnham DCO project. Further details on recent applications submitted for proposed substations to other Planning Authorities and a project overview can be found at the following link:

https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects/brinsworth-high-marnham-uprating

Further Advice

NGET is happy to provide advice and guidance to the Council concerning their networks. Please see attached information outlining further guidance on development close to National Grid assets.

If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult NGET on any Development Plan Document (DPD) or site-specific proposals that could affect our assets.

Fisher German LLP is a limited liability partnership. Registered in England and Wales. Registered Number: OC317554. Registered Office: The Head Office Ivanhoe Office Park, Ivanhoe Park Way, Ashby-De-La-Zouch, Leicestershire, England, LE65 2AB. A list of members' is available for inspection at Head Office.

We would be grateful if you could add our details shown below to your consultation database, if not already included:

Angela Brooks MRTPI, Partner
[redacted]

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

[redacted]

Angela Brooks MRTPI
Partner

For and on behalf of Fisher German LLP

Fisher German LLP is a limited liability partnership. Registered in England and Wales. Registered Number: OC317554. Registered Office: The Head Office Ivanhoe Office Park, Ivanhoe Park Way, Ashby-De-La-Zouch, Leicestershire, England, LE65 2AB. A list of members' is available for inspection at Head Office.

Further Guidance

NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

NGET's 'Design guidelines for development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: https://www.nationalgrid.com/document/345326/download

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

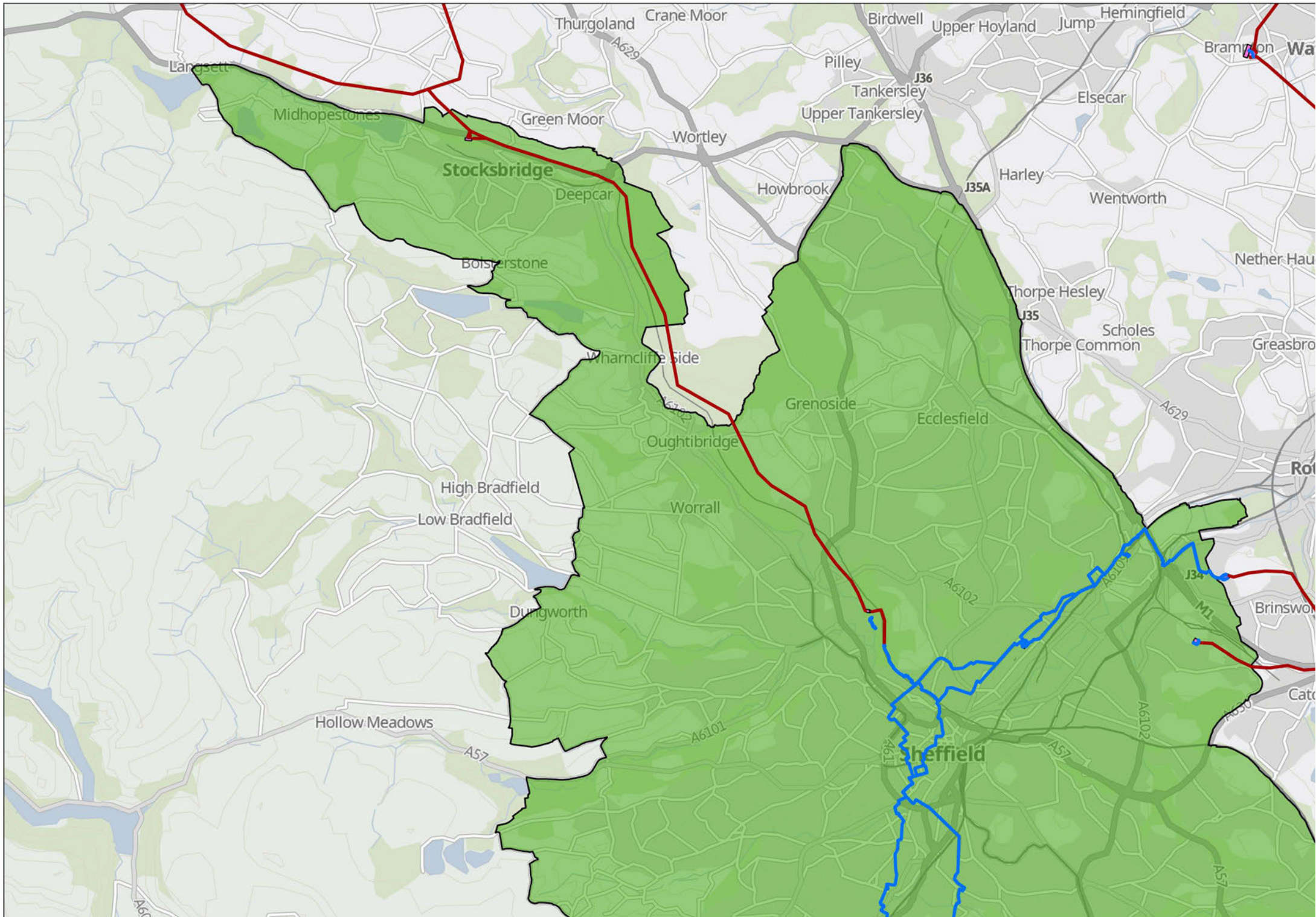
NGET's statutory safety clearances are detailed in their Technical Guidance Note 'Third-party guidance for working near National Grid Electricity Transmission equipment', which can be downloaded here: https://www.nationalgrid.com/document/349291/download

How to contact NGET

If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: https://lsbud.co.uk/

For local planning policy queries, please contact: ngplanning@fishergerman.co.uk

Fisher German LLP is a limited liability partnership. Registered in England and Wales. Registered Number: OC317554. Registered Office: The Head Office Ivanhoe Office Park, Ivanhoe Park Way, Ashby-De-La-Zouch, Leicestershire, England, LE65 2AB. A list of members' is available for inspection at Head Office.


Thurgoland
Crane Moor
Birdwell
Upper Hoyland
Jump
Hemingfield
Brampton
Pilley
J36
Tankersley
Upper Tankersley
Elsecar
Midhopestones
Green Moor
Wortley
Stocksbridge
Deepcar
Howbrook
J35A
Harley
Wentworth
Bolsterstone
Thorpe Hesley
J35
Scholes
Thorpe Common
Wharncliffe Side
Grenoside
Ecclesfield
Oughtibridge
High Bradfield
Worrall
Low Bradfield
Dungworth
J34
M1
Hollow Meadows
A57
A6101
A6102
Sheffield

REF5.0400

Outlook

Objection to the proposed Main Modification to the Sheffield Local Plan - Site SES 13

From [redacted]
Date Tue 2026-05-05 12:26 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

[redacted]

We are writing to object to the proposed Main Modification 227 (MM227) in the Sheffield Plan because:

It weakens the protections

It makes the condition optional rather than compulsory, so there are no guarantees that the condition will be adhered to.

We comment in relation to site SES13, but obviously the same applies to all sites that the proposed MM227 applies to

John And Sally Walton
[redacted]

Sent from Outlook for Android