

Sheffield Plan Main Modifications

Responses – by email

Reference numbers REF5.0151 to REF5.0200

Reference Number	Respondent Name	Organisation
REF5.0151	Tom Lacey	Individual
REF5.0152	Hazel Hill	Individual
REF5.0153	Danielle Marsh	Individual
REF5.0154	Ruth Price	Individual
REF5.0155	Amber Hotchen	Individual
REF5.0156	Ryan Sylvester	Individual
REF5.0157	Bryan Price	Individual
REF5.0158	Lily Locking	Individual
REF5.0159	Mary Bennett	Individual
REF5.0160	Leah Walker	Individual
REF5.0161	Geoff Bennett	Individual
REF5.0162	Claire Beckingham	Individual
REF5.0163	Rachel Bailey	Individual
REF5.0164	Jim Hobson	Individual
REF5.0165	Laura Dean	Individual
REF5.0166	Sarah Crookes	Individual
REF5.0167	Carole Simpson	Individual
REF5.0168	Sean McDaid	Individual
REF5.0169	Michael Naylor	Individual
REF5.0170	B & G Dyche	Individual
REF5.0171	Linda Tibbles	Individual
REF5.0172	Alex Tibbles	Individual
REF5.0173	Margaret & Maxwell Lea	Individual
REF5.0174	William Ward	Woodland Trust
REF5.0175	Elizabeth Sadiq	Individual
REF5.0176	Michael Rowley	Individual
REF5.0177	Paul Taylor	Individual
REF5.0178	Paul Bridges	Individual
REF5.0179	Rosayn & David Platts	Individual
REF5.0180	Andrea Platts	Individual
REF5.0181	Alice Wright	Individual
REF5.0182	Hannah Wright	Individual
REF5.0183	Jonathan Hobson	Individual
REF5.0184	Kate Hobson	Individual

REF5.0185	Nicola Bates	Individual
REF5.0186	Chris Martin	Home Builders Federation
REF5.0187	Albert Whysall	Individual
REF5.0188	Karen Hobson	Individual
REF5.0189	Chris Carroll	Sport England
REF5.0190	Samantha Green	Individual
REF5.0191	Kerr Atkins	Individual
REF5.0193	Christopher White	Individual
REF5.0194	Mr and Mrs Bailey	Individual
REF5.0195	Mick Rooney	Councillor
REF5.0196	Caroline Dunn	Individual
REF5.0197	Jamie Stafford	Individual
REF5.0198	Cheryl Pursehouse	Individual
REF5.0199	Debra Coleman	Individual
REF5.0200	Rebecca Doncaster	Individual

REF5.0151

MM411 SES30

From Tom Lacey [REDACTED]
Date Tue 2026-04-28 7:50 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Hi, here is my objection to the MM411 green belt plan in S13.

1. The traffic is unbearable at the best of times. People passing over Handsworth or towards Sheffield have a long wait at certain times. Adding roadworks to that every month makes it even worse. The roads are terrible so this is inevitable. Put more cars in the area not only have we lost our greenbelt, but added pollution to the lives of our children.
2. Schools, Doctors, Dentists ect. Schools cannot cope, I. They will accept more kids at the detriment of the current kids. More kids - worse performing schools. We already have half the Waverley estate using our facilities as theirs is also not sufficient. Looks like more of the same.
3. This plan is the most ridiculous I hopefully encounter in my lifetime. I hope you are happy with yourselves, as these emails are a box ticking exercise for you

regards,
Tom Lacey

Sent from [Outlook for Android](#)

REF5.0152

Objection to MM411 (SES30) – Bramley / Beaver Hill Fields

From Hazel Hill [REDACTED]
Date Tue 2026-04-28 8:00 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[REDACTED]

Dear Sir/Madam,

I write to object to Modification MM411 (SES30) relating to Bramley / Beaver Hill Fields.

In my view, the proposed allocation is unsound as it is not justified or effective when considered against the realities of the site and its surroundings.

The proposal appears to assume that the impacts of development can be mitigated, rather than demonstrating that the site is inherently suitable. In practice, the surrounding road network and local infrastructure already operate under pressure. Based on lived experience of the area, even small increases in demand can lead to noticeable impacts. A development of this scale would represent a step change, not an incremental one, and there is insufficient evidence that this can be accommodated.

The site also performs an important spatial function. It provides a clear and meaningful separation between existing built-up areas. The loss of this land would result in a more continuous urban form, undermining the openness that the Green Belt is intended to protect. This harm cannot be mitigated once development takes place.

Furthermore, the allocation relies on assumptions about delivery and mitigation that have not been robustly demonstrated. This raises concerns about whether the site is effective and deliverable within the Plan period.

Overall, the evidence does not clearly show that this site is the most appropriate option when reasonable alternatives exist. As such, the allocation is not justified.

For these reasons, I request that MM411 is removed from the Plan and retained as Green Belt.

Yours faithfully,
Hazel Hill

[REDACTED]

REF5.0153

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

From [REDACTED]
Date Tue 2026-04-28 8:13 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Strategic Planning Team,

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

Firstly as a local resident and mother [REDACTED] I strongly oppose the plan for many reasons but mainly due to its proximity to the school and our local green space that is the children's park and play ground. The long term effects this development will have on mine and my children's livelihoods is not acceptable. Childhood is such a short time period where we nurture them and enjoy time outdoors. These first years are vital in a child's development. I fear for the added pollution beside their school and our homes, and the destruction of our local wildlife which is totally against the lessons we teach our children in school. This is not to mention the impact it will have on our local services and the already gridlocked roads. I strongly urge you to reconsider your position on this matter.

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,

Danielle Marsh

Sent from my iPhone

REF5.0154

Sheffield Plan – Main Modifications Consultation - NWS31 Comments

From Ruth Price [REDACTED]
Date Tue 2026-04-28 8:24 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

I wish to make comments on the soundness of Main Modifications to The Sheffield Plan especially those specifically about Green Belt site allocation NWS31 (land between Storth Lane and School Lane, S35 0DT)

MM7 Para 2.12 has added an additional objective: “maintain a Green Belt to assist in urban regeneration, by encouraging the recycling of derelict and other urban land”

This is an admirable objective which is impossible to reconcile with the proposed 14 sites and a plan 3500+ on these greenfield areas. Development is a financially risky business, Green Belt greenfield sites often offer less risk (higher property values, less complex ownership, contamination less likely etc.) to a potential builder. It is therefore in a developers interest to develop these sites first, leaving many of the more difficult urban sites in currently ‘run down’ locations., this further hollowing out the city and directly contradicting the objective of urban regeneration. As a result, it is clear that the plan is not sound.

Within the Main Modifications there are already a number of brownfield windfall sites identified ‘Opportunity Sites’ (pages 171/173) and ‘Large Windfall Sites’ at page/policy 19/SA2, 20/SA3&4, 21/SA5, 22/SA6 and 24/MM77. My understanding of “windfall site” is one which planners have decided to add to the total, instead of using it to replace a greenfield one. This makes no sense, if the plan is to be considered sound these windfall sites need to be fully assessed first and ‘properly allocated’ removing/reducing the need for Green Belt sites in order to be consistent with the objective referred to above.

The Council understandably ‘called for sites’ consultation. During that consultation period much has changed and new sites have been identified which would mitigate the need to release Green Belt. If the plan can only be considered sound once these sites have been properly assessed. It would be unforgivable if they were just ‘cast aside’ as windfalls and planners fail to use this opportunity for regeneration.

MM332. (page 141/2) Site NWS31 This is one of the sites allocated for housing in the green belt.

MM332, conditions 1,3. When I first moved to this areas this site was used for horses but for many years it has been left vacant and uncultivated for many years by the land owner (the Council). As a consequence, it has become a and very well used, public open green space for the local community, it offers children living on Green lane, Damasel Close and Spring Grove Gardens the opportunity to walk independently to school without crossing any major roads, which is, in fact, what both my children did. The area provides formal and informal paths providing connections to Glen Howe Park and linking different areas of Wharncliffe Side. Any development would see the almost total loss of this valued community amenity. Children would now have to walk through the development crossing the roads build on the new estate, inevitably some parents will choose to drive their children instead, leading to more traffic.

Furthermore, a financial contribution to improve open space elsewhere or to provide a very limited amount on site as outlined in the Council’s compensatory proposals (as outlined in Sheffield Plan Green Belt Allocations: Compensatory Opportunities within remaining Green Belt) are not sufficient.

The Main modifications are not sound because they miss the point, what residents want is access to open, uncultivated, road free areas of green space. Even generous financial compensation would not adequately compensate the community for the loss of this amenity.

The legality of Main Modification can be challenged. Members of the local community who have Protected Characteristics will lose this large accessible amenity of public open space with no suitable alternative nearby. The Equality Act 2010 protects people with issues such as disabilities, illness, reduced mobility and children, development of this area would have a negative impact on their Health and Wellbeing and would disproportionately harm those from vulnerable groups. This is especially true for children who would lose access to an area of uncultivated and unsophisticated land. I have seen it used by young children to build dens, play hide and seek and simply to run. I have also seen small groups of teenagers, looking for some space just sitting in the sun. This would be a breach of the Equality Act 2010.

The reasons are:

The distance to the remaining Green Belt will be significantly increased for many members of the community, especially those living in the Don Avenue/Dixon Drive area. Over 300m in many cases, especially critical for many with protected characteristics and mobility issues. It is highly unlikely children would be allowed to play independently that far from home.

The proposed 15m buffer is insufficient, it may protect some (albeit small) open space but this will be some considerable distance from the main part of the village making access difficult/impossible for those with limited mobility. The limited space is also on the lowest part which I know from personal experience is often water logged, this results in poor quality open space. It will also be surrounded by housing, children especially may be discouraged by the visibility so the open space is left unused and children's opportunities for free play is once again lost.

Glen Howe Park and open space at Wharnccliffe Avenue will not provide the ease of access for those with protected characteristics which this site does

A suggested update to the Main Modifications should therefore state: 'there should be an obligation for the council and planning teams to work with the local community 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 '

MM322, condition 4

The site NWS31 is known to have a significant problem with groundwater and drainage. During wet periods large parts of the field are waterlogged, not just the lower area along Tinker Brook. This problem has historically affected the adjacent properties on Don Avenue and Dixon Drive in the village. It should be noted that the Environment Agency recently funded extensive tree planting on the site to mitigate the flood risk

The level 2 Strategic Flood Risk Assessment did not identify the problem; this is a major omission. The Main Modifications depend on the accuracy of the SFRA and therefore the Main Modifications cannot be considered sound, this issue could have a major impact on the viability of the site, failure to take it into consideration undermines the modifications.

It is therefore necessary for the Main Modifications to include a requirement for a full detailed assessment of groundwater and site run off, BEFORE it is released for development. I cannot understand why this has not been included, climate change and flooding are real issues and failure to assess groundwater seems careless at best and negligent at worst.

MM332, condition 8,9,10

None of the protected species identified in previous consultations have been mentioned in the Main Modifications, hence the Modifications cannot be considered sound in respect Biodiversity. During previous consultations, and at the hearings, residents have provided evidence of protected species

such as bats. The site has been identified as having high Biodiversity Net Gain Value in the Ecology Report even without the mention of protected species. Consequently, the Main Modification should state that a detailed assessment should be carried out for protected species on or close to the site and the BNG should take this new information into account. Existing Ecology Report that as a minimum area of open grassland should be retained as buffers. Furthermore, there should be light restrictions around foraging and flight paths. This should be for wildlife and separate from any open space retained for the community or for flood mitigation near Tinker Brook.

The phrase 'where feasible' must therefore be removed, so the statement reads 'Biodiversity Net Gain should be delivered on site within these areas in the first case, in line with the BNG hierarchy, otherwise what is the point of an Ecology Report identifying high Biodiversity Net Gain Value? Failure to protect this area after such a report runs the risk of setting a dangerous precedence where Ecology Reports are overruled whenever it suits planners purposes.

Yours Sincerely

Ruth Price

REF5.0155

Oppose Charnock green belt s12

From Amber [REDACTED]
Date Tue 2026-04-28 6:08 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[REDACTED]

Please dear council we implore you to use the empty buildings all over Sheffield town centre instead of building on our green area. We do not have the school space. The traffic it will cause so much congestion into an already congested area find somewhere else

Dear Strategic Planning Team,

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

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

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

Modifications Consultation (referred to in this document as IIA from this point, which can be found [here](#)) confirms that 'permanent negative effects would remain' on the environment and landscape character of SS19 as a result of its development. The assessment also confirms in paragraph 5.9.12 that the moderation of allocating green belt sites for development will have predominantly negative effects that will be difficult to fully mitigate. **MM10 MM11 MM90-MM93** - The Sheffield Local Plan relies on a significant windfall

allowance of 7,475 homes out of a total supply of 39,159 homes (MM90), equating to approximately 19% of the overall housing supply.

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

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

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

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

There are also significant concerns about primary school provision across the S12 area, with Charnock Primary Academy (the primary school closest to SS19) already being oversubscribed by 33% (Sheffield City Council, 2025). The plan proposes the development of approximately 1,600 new homes in this part of the city (Draft Sheffield Local Plan Interactive Map and Sheffield Additional Site Allocations), growth that would ordinarily require a new primary school if delivered as a single strategic development. However the plan fails to demonstrate that essential education infrastructure can support the proposed level of growth.**MM19-** The wording “include consideration” is non-binding and fails to secure delivery.

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

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

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

This is particularly important for the S12 area, where transport is a significant concern in relation to the scale of development proposed. The Sheffield Local Plan identifies approximately 1,600 new homes across S12, which will inevitably generate a

substantial increase in traffic movements and place additional pressure on an already constrained local road network. However, due to the dispersed spatial distribution of these allocations, there is currently no clear or coordinated transport strategy demonstrating how the cumulative impact of these developments will be mitigated. The plan does not provide sufficient detail regarding required junction improvements, public transport capacity, pedestrian and cycling infrastructure, or wider highway mitigation measures necessary to support this level of growth. Without clear and deliverable transport commitments, there is a risk that the cumulative traffic impacts will significantly worsen congestion, reduce road safety, and undermine the sustainability of the area. Paragraph 5.6.5. If the IIA states that site SS19 'benefits from its proximity to the blue tram route and a high-frequency bus corridor', however, the lived experience of current residents is that this route is already under pressure during peak times and buses are infrequent and unreliable. As such, it is unclear how the proposed level of housing growth in S12 can be accommodated without substantial and clearly defined transport infrastructure improvements.

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

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

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

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

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

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

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

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

MM429 (SS19) - The S12 Green Belt Action Group has submitted two previous consultation statements for MM429 (SS19) which highlight significant site constraints including flood risk and the ecological corridor, the need to protect the robin brook and its impact on the Moss Valley SSSI along with access constraints and hedgerow buffers

but SS19 is not referenced in MM224 or MM227, which should require recalculation of housing impact across site allocations. This omission is concerning. If SS19's constraints are serious enough to warrant modification text, they should also trigger a reassessment of its contribution to housing supply. The failure to cross-reference SS19 in the impact recalculation undermines the credibility of the housing trajectory and suggests that constraint-driven reductions are not being applied consistently. This raises soundness concerns under NPPF paragraph 36(b) and (c): the plan may not be justified or effective if constrained sites are retained without transparent recalibration. The inconsistency also risks undermining spatial equity, as less constrained sites may be overburdened to compensate for undeliverable allocations like SS19.

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

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

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

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

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

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

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

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

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

Amber Hotchen





REF5.0156

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

From Ryan Sylvester [REDACTED]
Date Tue 2026-04-28 8:37 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>
Cc S12 Green Belt [REDACTED]

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.

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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.

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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,

Ryan Sylvester



REF5.0157

Sheffield Plan – Main Modifications Consultation - Comments

From Bryan Price [REDACTED]
Date Tue 2026-04-28 8:54 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Planning Inspector

I wish to make comments on the soundness of Main Modifications to The Sheffield Plan especially those specifically about Green Belt site allocation NWS31 (land between Storth Lane and School Lane, S35 ODT)

MM7 Para 2.12 has added an additional objective: “maintain a Green Belt to assist in urban regeneration, by encouraging the recycling of derelict and other urban land”

I support this objective BUT find it difficult to reconcile it with the proposed 14 sites with sufficient capacity for 3500+ houses in the plan. Development is an inherently financially risky business. Green Belt greenfield sites usually offer less risk (higher property values, less complex ownership, contamination less likely etc.) to a potential builder. Thus, we can reasonably expect that these sites will be developed first, before many of the more difficult urban sites in currently ‘run down’ locations, directly contradicting the objective of urban regeneration making the plan not sound.

Within the Main Modifications there are already a number of brownfield windfall sites identified ‘Opportunity Sites’ (pages 171/173) and ‘Large Windfall Sites’ at page/policy 19/SA2, 20/SA3&4, 21/SA5, 22/SA6 and 24/MM77. If the plan is to be considered sound these need to be fully assessed first and ‘properly allocated’ removing/reducing the need for Green Belt sites to be consistent with the objective I referred to above.

It is now some years since the Council ‘called for sites’ consultation. In the intervening period much has changed with many interested groups and individuals working on identifying new sites to mitigate the need to release Green Belt. If the plan is now to be considered sound, then these require proper assessments, not just ‘cast aside’ as windfalls. The Main Modification is not sound in this respect.

MM332. (page 141/2) Site NWS31 This is one of the sites allocated for housing in the green belt.

MM332, conditions 1,3. This site has been left vacant and uncultivated for many years by the land owner (the Council) with the boundary walls falling into disrepair. As a consequence, it has become a significant, and very well used, public open green space for the local community, with formal and informal paths providing connections to Glen Howe Park and linking different areas of Wharnccliffe Side. Any development would see the almost total loss of this valued community amenity.

The Main modifications are not sound because the Council’s compensatory proposals (as outlined in Sheffield Plan Green Belt Allocations: Compensatory Opportunities within remaining Green Belt) are not sufficient, even in the most generous form, by a financial contribution to improve open space elsewhere or to provide a very limited amount on site. These would not adequately compensate the community for the loss of this amenity.

The Main Modification is not ‘legal’ in the sense that those members of the local community that have Protected Characteristics will lose this large accessible amenity of public open space with no

suitable alternative nearby. Crucial for those with issues such as disabilities, illness, reduced mobility and children. It 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.

The reasons are:

The distance to the remaining Green Belt will be significantly increased for many members of the community especially those living in the Don Avenue/Dixon Drive area. Over 300m in many cases, especially critical for many with protected characteristics and mobility issues.

The proposed 15m buffer that will protect some (albeit small) open space is some considerable distance from the main part of the village making access difficult/impossible for those with limited mobility. It is on the lowest part of the site which is often water logged, making it poor quality public space.

Any proposed compensation in the surrounding area at Glen Howe Park, Wharncliffe Avenue or indeed towards the Upper Don trail does not in any way meet the standards of this site in terms of the closeness and ease of access for those with protected characteristics and others

A suggested update to the Main Modifications should state: 'there should be an obligation for the council and planning teams to work with the local community 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 '

MM322, condition 4

The site NWS31 is known to have a significant problem with groundwater and drainage. During wet periods large parts of the field are waterlogged, not just the lower area along Tinker Brook. This problem has historically affected the adjacent properties on Don Avenue and Dixon Drive in the village. It should be noted that the Environment Agency recently funded the tree planting on the site to mitigate the flood risk

The level 2 Strategic Flood Risk Assessment did not identify the problem. The Main Modifications depend on the accuracy of the SFRA. As such the Main Modifications cannot be considered sound because this issue could have a major impact on the viability of the site.

The Main Modifications should include a requirement for a full detailed assessment of groundwater and site run off BEFORE it is released for development

MM332, condition 8,9,10

The Main Modifications are not sound in respect Biodiversity because there is no specific mention of protected species. During previous consultations, and at the hearings, residents have provided evidence of protected species. The site has been identified as having high Biodiversity Net Gain Value in the Ecology Report even without the mention of protected species.

Main Modification should state that a detailed assessment should be carried out for protected species on or close to the site and the BNG should take this new information into account. As per the existing Ecology Report some areas of open grassland should be retained as a minimum with buffers and light restrictions around foraging and flight paths. This should be for wildlife and separate from any open space retained for the community or for flood mitigation near Tinker Brook.

The phrase 'where feasible' should be removed, so 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 faithfully

Bryan Price

REF5.0158

(No subject)

From Lily Locking [REDACTED]
Date Tue 2026-04-28 8:54 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

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

Dear Strategic Planning Team,

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

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

I therefore set out below my objections to specific modifications.

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

Further to this, paragraph 5.9.8 of the Impact Assessment Report Addendum: Modifications Consultation (referred to in this document as IIA from this point, which can be found [here](#)) confirms that 'permanent negative effects would remain' on the environment and landscape character of SS19 as a result of its development. The assessment also confirms in paragraph 5.9.12 that the moderation of allocating green belt sites for development will have predominantly negative effects that will be difficult to fully mitigate. **MM10 MM11 MM90-MM93** - The Sheffield Local Plan relies on a significant windfall

allowance of 7,475 homes out of a total supply of 39,159 homes (MM90), equating to approximately 19% of the overall housing supply.

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

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

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

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

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There are also significant concerns about primary school provision across the S12 area, with Charnock Primary Academy (the primary school closest to SS19) already being oversubscribed by 33% (Sheffield City Council, 2025). The plan proposes the development of approximately 1,600 new homes in this part of the city (Draft Sheffield Local Plan Interactive Map and Sheffield Additional Site Allocations), growth that would ordinarily require a new primary school if delivered as a single strategic development. However the plan fails to demonstrate that essential education infrastructure can support the proposed level of growth.**MM19-** The wording “include consideration” is non-binding and fails to secure delivery.

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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.

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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.

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

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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,

Lily Locking

Sent from [Outlook for iOS](#)

REF5.0159

Objections to Main Modifications MM410 and MM411 – Sheffield Local Plan

From Mary Bennett 
Date Tue 2026-04-28 9:00 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email


23 April 2026

Strategic Planning Team & General Inspector
Planning Services
5th Floor
Howden House
Sheffield
S1 2SH

Dear Inspector

Objection to Main Modifications MM410 and MM411 – Sheffield Local Plan

I am writing to object to the Sheffield Local Plan Main Modifications, specifically MM410 (SES29 – Handsworth Hall Farm) and MM411 (SES30 – Bramley Lane / Beaver Hill Road).

I consider these modifications to be unsound to release this site from the Green Belt. They are not justified by robust or proportionate evidence, are not effective, and are not consistent with national policy regarding Green Belt release.

At a city-wide level, the Council's own evidence demonstrates that the modified Plan performs worse environmentally. The Integrated Impact Assessment shows negative impacts on soil, biodiversity, landscape and transport, with increased reliance on car-dependent locations. This indicates that the Plan is not justified, as the environmental harm has worsened without sufficient evidence that the trade-offs are acceptable.

In addition, the reliance on the so-called "Golden Rules" for Green Belt release is vague and lacks measurable or enforceable standards. There is no clear demonstration of how these requirements will be delivered on specific sites, nor how they affect viability. This undermines both the effectiveness and justification of the Plan.

The Plan also relies heavily on mitigation measures that are not yet fully defined or costed. For example, the Habitats Regulations Assessment reaches a positive conclusion based on mitigation that will only be developed after adoption. This raises serious concerns about whether the Plan is genuinely deliverable in practice.

Turning to site SES30 (MM411), I have significant concerns regarding access, ecology, and overall deliverability. The proposal depends entirely on access via Beaver Hill Road, yet the Council's own evidence shows that nearby junctions will be operating at or near capacity, with a risk of severe congestion. Safe and suitable access has not been demonstrated.

Ecologically, the site is of high value, and there is no clear evidence showing how the required 10% Biodiversity Net Gain will be achieved. Furthermore, the site is constrained by watercourses, ancient woodland, hedgerows and other environmental features, which call into question whether the stated housing numbers are realistic.

The inclusion of land for a school and burial ground is also speculative. If these uses do not materialise, the land may later be used for additional housing, meaning the Green Belt will have been released without the original justification. This approach is inconsistent with national policy, which requires exceptional circumstances for Green Belt release.

For site SES29 (MM410), similar concerns apply. The Council's assumptions about developable land appear to significantly exceed those in the landowner's own masterplan, suggesting the housing capacity is overstated. The site is also affected by potential contamination and coal mining risks, yet no detailed investigation has been carried out to confirm how much land is suitable for development.

Access arrangements and infrastructure requirements remain unresolved and unfunded, and key ecological evidence was incomplete and only published after the allocation decision had effectively been made. This raises serious concerns about the soundness of the evidence base.

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

Overall, both sites rely on uncertain viability, unresolved constraints, and deferred mitigation. This means the Plan cannot be considered effective or deliverable.

For these reasons, I request that Main Modification MM410 (SES29) and Main Modification MM411 (SES30) be removed from the Plan and that these sites remain designated as Green Belt.

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

Yours faithfully
R Mary Bennett (Mrs)

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Kind regards
Mary Bennett

REF5.0160

Objection to the Proposed building SS19

From Leah Walker [REDACTED]
Date Tue 2026-04-28 9:00 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[REDACTED]

Dear Strategic Planning Team,

I am writing to object the proposed housing on the greenbelt sights around Sheffield but particularly the area next to White Lane, S12.

Firstly my worry is the pollution caused and noise around school for all the students and staff and Charnock Hall Primary. The sight is extremely close to the area. This will be very disruptive during the build and after due to them then been surrounded by roads where as now they are on the edge of the estate making it cleaner air for all in the school. The pollution alone worries me along with many parents let alone the extra noise and traffic this will bring around the school area.

Traffic alone now is really bad at peak times, regularly queuing from white lane to ridgeway, imagine the chaos if this actually happens bringing the cars from the build Sheffield are proposing, have you also considered the build NE Derbyshire are proposing on the the sight next to this one, meaning the potential traffic could be immensely worse you have suggested. This along with the other nearby sights that are also been talked about having housing built.

Also a lot of this housing will be unaffordable. If 50% is affordable that means the same isn't. We don't need unaffordable housing built on the greenbelt. This will do nothing positive especially on a GREENBELT. Sheffield was once known as the 'Green' city. This will be a thing of the past getting rid of the greenbelts.

Since all the talks began I really am wanting to leave Sheffield as it's not the city it once was and now there is potential that out local countryside is at risk, the one constant calm quiet place in hectic lives, it fills me personally with dread and anxiety. This will then generate more pollution that we will have to drive out the the peaks for this calm rather than stay local.

Also the wildlife is been ignored. Skylarks are ground breeding birds and nest year after year on the land. Where will they go, will they be protected if nesting then work commences. There are buzzards that are finally increasing in numbers, sparrowhawks, kestrels and owls that are often also seen on the sight and even the occasional Red Kite has been spotted in the area. Also many hares, rabbits, foxes, badgers and deer seen, the hedgehog now and again too. This is what we know of and sure there will be more. This is their home.

While I recognise the need for a 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,

Leah Walker



REF5.0161

Objection to Main Modifications MM410 (SES29) and MM411 (SES30) – Sheffield Local Plan

From Geoff Bennett 
Date Tue 2026-04-28 9:08 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email


28 April 2026

Strategic Planning Team & General Inspector
Planning Services
5th Floor
Howden House
Sheffield
S1 2SH

Dear Inspector

Objection to Main Modifications MM410 (SES29) and MM411 (SES30) – Sheffield Local Plan

I am writing as a local resident to object to the Sheffield Local Plan Main Modifications, specifically MM410 (SES29 – Handsworth Hall Farm) and MM411 (SES30 – Bramley Lane / Beaver Hill Road).

I consider these modifications to be unsound to release this site from the Green Belt. They are not justified by robust evidence, are not effective, and are not consistent with national policy on Green Belt protection.

I live in the S13 area and regularly use the roads and green spaces affected by these proposals. The fields around Bramley Lane and Handsworth Hall Farm are not just undeveloped land – they are an important part of the local landscape, used daily by residents for walking, recreation, and access to nature. Losing this Green Belt would permanently change the character of the area and reduce the separation between communities.

My biggest concern is traffic and road safety. Beaver Hill Road and the surrounding routes are already busy, particularly at peak times. Adding over 800 homes at SES30, along with a school and burial ground, would place enormous strain on a road network that is clearly not designed for this level of use. The fact that access is still “subject to further transport assessment” shows that this issue has not been properly resolved.

I am especially concerned about the impact on children attending Handsworth Grange School, as increased traffic and congestion will worsen air quality and road safety directly outside the school. The Council's own modelling suggests nearby junctions will be operating close to capacity, which points to a real risk of congestion and rat-running through residential streets.

There are also serious environmental concerns. These sites support wildlife, mature hedgerows, and important habitats, yet there is no clear evidence showing how the required Biodiversity Net Gain will be achieved. It is difficult to see how development on this scale can take place without significant harm to biodiversity.

More broadly, the Council's own evidence shows that the modified Plan performs worse in environmental terms, including impacts on land, biodiversity, and transport. This raises serious doubts about whether the Plan is justified.

I am also concerned that key elements of the proposals are uncertain or speculative. For example, land at SES30 is being released from the Green Belt partly to accommodate a school and burial ground, yet there is no firm evidence that these uses are required or will be delivered. If they do not go ahead, the land may later be used for additional housing, meaning the Green Belt will have been lost without proper justification.

For SES29, I am concerned that the scale of development is unrealistic given the site's constraints, including potential contamination and mining risks, and that access and infrastructure requirements have not been clearly resolved.

Overall, both sites rely on unresolved issues, uncertain mitigation, and optimistic assumptions about delivery. This means the Plan cannot be considered effective or sound.

For these reasons, I request that Main Modification MM410 (SES29) and Main Modification MM411 (SES30) be removed from the Plan and that these sites remain designated as Green Belt.

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

Yours faithfully
Geoffrey T Bennett

Regards

Geoff Bennett

REF5.0162

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

From [REDACTED]
Date Tue 2026-04-28 9:25 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[REDACTED]

Dear Strategic Planning Team,

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

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

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

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

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

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

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

MM18- With SS19 being one of the first green belt sites to be developed, and a year 7 place deficit until 2028/29, this does not provide the assurance that there will be adequate educational provision in the S12 area. Paragraph 3.2.3 of the Integrated Impact Assessment Report Addendum: Modifications Consultation (document [here](#)) states that, if a city centre school was built, it would be unlikely to be ready in time for the forecast peak deficit in places, weakening this mitigation further still. The moderation also fails to address how the educational needs of a post 16 student population, which

continues to rise and will peak in 2028/29, will be met. This is a particular concern for S12 as the population will increase significantly with the planned development and south-east Sheffield has no post-16 provision. There are also significant concerns about primary school provision across the S12 area, with Charnock Primary Academy (the primary school closest to SS19) already being oversubscribed by 33% (Sheffield City Council, 2025). The plan proposes the development of approximately 1,600 new homes in this part of the city (Draft Sheffield Local Plan Interactive Map and Sheffield Additional Site Allocations), growth that would ordinarily require a new primary school if delivered as a single strategic development. However the plan fails to demonstrate that essential education infrastructure can support the proposed level of growth. MM19- The wording “include consideration” is non-binding and fails to secure delivery. The modification does not commit to a new facility, which is not allocated a site, and does not address the spatial mismatch between need and provision. S12, which lies outside the Central Sub-Area, is expected to absorb significant residential growth with just one extra consultation room being allocated to the area in the plan, despite having pockets of high deprivation and subsequent poor health outcomes. MM19 does not demonstrate how healthcare needs arising from this growth will be met, and fails the NPPF tests of effectiveness and justification, and risks exacerbating health inequalities unless strengthened. Concerns around the impact of development on health and wellbeing are supported by the revised IIA (which can be found [here](#)) which states that ‘some new site allocations may reduce the overall amenity experienced by nearby residents. Although the Plan already includes measures to minimise these effects, it is unlikely that all remaining negative impacts can be fully avoided’. Paragraph 5.2.2 of this document also acknowledges that removal of greenbelt will have ‘some negative effects in terms of mental health and wellbeing’ on surrounding communities.

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

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

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

Claire Beckingham

REF5.0163

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

From [REDACTED]
Date Tue 2026-04-28 9:46 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Strategic Planning Team,

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

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

MM7- This reframes the purpose of the Green Belt by highlighting only its role in

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

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

MM10 MM11 MM90-MM93 - The Sheffield Local Plan relies on a significant windfall

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

realised in a consistent, sustainable, or timely manner.

MM92 defines that the housing trajectory shows that the Sheffield Local Plan delivers only 298 dwellings above the identified requirement of 38,020 homes. This represents a margin of less than 1% across the entire plan period, providing no

meaningful flexibility to account for delays, non-delivery, viability issues, or infrastructure constraints. This is particularly concerning given the Plan provides only a very small margin above its housing requirement, meaning any shortfall in windfall delivery would

result in the Plan failing to meet its targets.

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

also fails to address how the educational needs of a post 16 student population, which continues to rise and will peak in 2028/29, will be met. This is a particular concern for S12 as the population will increase significantly with the planned development and south-east Sheffield has no post-16 provision. There are also significant concerns about primary school provision across the S12 area,

with Charnock Primary Academy (the primary school closest to SS19) already being oversubscribed by 33% (Sheffield City Council, 2025). The plan proposes the development of approximately 1,600 new homes in this part of the city (Draft Sheffield

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

However the plan fails to demonstrate that essential education infrastructure can

support the proposed level of growth.

MM19- The wording “include consideration” is non-binding and fails to secure delivery. The modification does not commit to a new facility, which is not allocated a site, and does not address the spatial mismatch between need

and provision. S12, which lies outside the Central Sub-Area, is expected to absorb significant residential growth with just one extra consultation room being allocated to the area in the plan, despite having pockets of high deprivation and subsequent poor health outcomes. MM19 does not demonstrate how healthcare needs arising from this growth will be met, and fails the NPPF tests of effectiveness and justification, and risks exacerbating health inequalities unless strengthened. Concerns around the impact of development on health and wellbeing are supported by the revised IIA (which can be found [here](#)) which states that 'some new site allocations may reduce the overall amenity experienced by nearby residents. Although the Plan already includes measures to minimise these effects, it is unlikely that all remaining negative impacts can be fully avoided'. Paragraph 5.2.2 of this document also acknowledges that removal of greenbelt will have 'some negative effects in terms of mental health and wellbeing' on surrounding communities.

MM20 -The phrase "wherever practicable" is unacceptably ambiguous in a policy area that is critical to sustainable development and infrastructure delivery. It provides no commitment or assurance that transport improvements will be secured. The modification fails the NPPF tests of effectiveness and clarity, and risks undermining modal shift, accessibility, and safety objectives. It also weakens the plan's ability to secure equitable outcomes across sub-areas. The wording must be replaced with a firm commitment to secure transport improvements proportionate to development scale and impact, supported by planning obligations and the Infrastructure Delivery Plan. This is particularly important for the S12 area, where transport is a significant concern in relation to the scale of development proposed. The Sheffield Local Plan identifies approximately 1,600 new homes across S12, which will inevitably generate a substantial increase in traffic movements and place additional pressure on an already constrained local road network. However, due to the dispersed spatial distribution of these allocations, there is currently no clear or coordinated transport strategy demonstrating how the cumulative impact of these developments will be mitigated. The plan does not provide sufficient detail regarding required junction improvements, public transport capacity, pedestrian and cycling infrastructure, or wider highway mitigation measures necessary to support this level of growth. Without clear and deliverable transport commitments, there is a risk that the cumulative traffic impacts will significantly worsen congestion, reduce road safety, and undermine the sustainability of the area. Paragraph 5.6.5. If the IIA states that site SS19 'benefits from its proximity to the blue tram route and a high-frequency bus corridor', however, the lived experience of current residents is that this route is already under pressure during peak times and buses are infrequent and unreliable. As

such, it is unclear how the proposed level of housing growth in S12 can be accommodated without substantial and clearly defined transport infrastructure improvements.

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

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

However, windfall sites are uncertain and cannot be guaranteed to come forward, or to deliver the infrastructure and affordable housing needed. This means the Plan is relying on outcomes that may never happen, while still allowing development on Green Belt land. The Council's own housing needs evidence shows that the majority of housing need in Sheffield is for affordable housing. However, the Plan relies on sites such as SS19 that are only likely to deliver around 30% affordable housing, alongside uncertain windfall development. This fails to align with the identified need and undermines the justification for releasing Green Belt land. As a result, the approach is not justified, not reliable, and does not provide confidence that the promised affordable housing will be delivered.

MM224 MM 227- These modifications recognise that some sites have constraints (such as flood risk, access issues, and environmental limits), but there is no evidence of any level of recalculation to ascertain the reduction in buildable area and therefore reduction of the number of homes expected from those sites. This raises concerns that the Plan is overestimating how many homes can actually be delivered. If parts of sites cannot be built on, the total housing numbers should be reduced accordingly.

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

constraints, including flood risk and the ecological corridor as well as additional buffers for the brook and hedgerows, this creates a risk that the Plan is relying on housing numbers that are not realistic, which undermines confidence that the overall housing target can be met & with such a low "buffer" of housing above the target, the plan could fail should the reality be reflected. As a result, the Plan is not reliable, the modifications are not consistent across sites and does not provide a clear or accurate picture of what can actually be delivered.

MM429 (SS19) - The S12 Green Belt Action Group has submitted two previous

consultation statements for MM429 (SS19) which highlight significant site constraints including flood risk and the ecological corridor, the need to protect the robin brook and its impact on the Moss Valley SSSI along with access constraints and hedgerow buffers but SS19 is not referenced in MM224 or MM227, which should require recalculation of housing impact across site allocations. This omission is concerning. If SS19's constraints are serious enough to warrant modification text, they should also trigger a reassessment of its contribution to housing supply. The failure to cross-reference SS19 in the impact recalculation undermines the credibility of the housing trajectory and suggests that constraint-driven reductions are not being applied consistently. This raises

soundness concerns under NPPF paragraph 36(b) and (c): the plan may not be justified or effective if constrained sites are retained without transparent recalibration. The inconsistency also risks undermining spatial equity, as less constrained sites may be overburdened to compensate for undeliverable allocations like SS19.

It is also apparent that even with amended brook buffers and hedgerow buffers, the

appropriate buffering has not been removed from the developable area, it is believed this will have an impact on the number of houses that are deliverable on the site and therefore impact the viability of the site.

The modifications also fail to consider the impact of North East Derbyshire District

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

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

There appears to have been no meaningful collaboration with Sheffield City Council to assess the combined effects of these neighbouring proposals. The absence of any cross-boundary assessment represents a clear gap in the evidence base and undermines the justification for retaining SS19 in the plan. This raises serious concerns regarding compliance with the Duty to Cooperate and further undermines the soundness of the Plan.

In conclusion, the main modifications do not adequately address the constraints and concerns highlighted in previous consultations, or during the public hearings. For the plan to be sound, it depends on modifications being

made, however those proposed are vague and lack the detail to demonstrate that they are specific, credible, deliverable or proportionate to the scale of the development in the area. This fails to align with paragraph 42 of the NPPF which states that 'the more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits'. I therefore urge the Inspectors to require further modifications, including the removal or reassessment of SS19, to ensure the Plan is sound I appreciate the opportunity to comment and urge the Inspectors and the Council to reconsider the Main Modifications to ensure the Local Plan remains robust, equitable, and fit for purpose.

The traffic on the surrounding road a is already terrible. White Lane at rush hour is a standstill, as is the traffic at Gleadless Townend. These road cannot cope as it is, there is no space on the roads for the traffic that this development will create.

We do not want our children's education to be disrupted by the noise disruption that a building site would bring. The children at Charnock Hall Primary Academy do not deserve to spend 5 days a week next to a busy building site. They deserve to continue to learn in a safe, quiet environment with space to take in the fresh air next to the green space and fields that they love to play in and explore.

The land where this development is planned is home to some wonderful wildlife. It's rare to be able to walk through the countryside so close to the city and see hares, deer, badger sets, we have bats, rabbits, birds of prey. But here in S12 this happens on a regular basis. If this development is allowed to go ahead, the habits of so many creatures will be destroyed. Once this green belt is gone, it is gone forever. And where will it stop?! Saying yes to this development will open the flood gates for future green belt development. It is up to Sheffield city council to advocate for those who live in the area. We love our countryside, we love the wildlife that we see on a daily basis in the very fields where this development is planned. We do not want greedy housing developers to destroy our area. Sheffield city council have a responsibility listen to residents and stop this development from happening.

Yours sincerely,
Rachel Mathers

REF5.0164

Sheffield Local Plan - Main Modifications Consultation

From Jim Hobson [REDACTED]
Date Tue 2026-04-28 10:33 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>
Cc [REDACTED]

 1 attachment (67 KB)
Sheffield Local Plan Objection to Main Modification MM411 – SES30.pdf;

External email

Dear Sirs,

Please find attached my objection to Main Modification MM411 in relation to the inclusion of site SES30 into the Sheffield Plan.

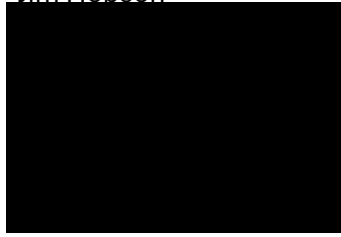
Please provide acknowledgment that you have received the attachment.

Regards
Jim Hobson

[REDACTED]

To:
Strategic Planning
Howden House
1 Union Street
Sheffield
S1 2SH

From:
Jim Hobson



sheffieldplan@sheffield.gov.uk

Date: 28th April 2026

Dear Planning Inspector

Subject: **Sheffield Local Plan - Main Modifications Consultation**
Objection to Main Modification MM411 – SES30 (S02502, S13)

1. Formal Position

Main Modification MM411 is unsound and legally non-compliant. It fails the tests of soundness under the National Planning Policy Framework (2023), is procedurally flawed, and relies on an evidence base that is inadequate, incomplete, internally inconsistent, and legally deficient.

The allocation proceeds notwithstanding known ecological constraints, unresolved flood risk issues, conflict in the Council's own evidence on Green Belt justification, and a legally unreliable Habitats Regulations Assessment screening conclusion. Those deficiencies are independently sufficient to undermine the allocation; taken together, they make clear that there is no lawful or policy-compliant basis upon which MM411 can be retained.

This representation places particular weight on protected bat species and the legal consequences that follow from the likely presence of European Protected Species on the site. This is not just environmental concern, it is a direct challenge to justification, effectiveness, legal compliance, and deliverability.

2. Failure of the “Justified” Test (NPPF para 35)

The allocation is not justified because it is not supported by proportionate, site-specific, or legally adequate evidence. A plan allocation cannot properly be described as justified where significant constraints are deferred for later assessment rather than evaluated before allocation is made. In ecological terms, the site characteristics are ideal habitat for supporting bat species and indeed documented evidence of common pipistrelle (*Pipistrellus pipistrellus*) and soprano pipistrelle (*Pipistrellus pygmaeus*) is available. Mature woodland characteristics, suitable commuting and foraging corridors, and relatively low-disturbance habitat conditions all point to the need for proper protected species assessment before an allocation decision is reached.

Yet EXAM 153 defers detailed ecological assessment rather than resolving it. No bat emergence surveys, no roost assessments, and no functional habitat assessment have been undertaken. The Council has therefore proceeded to allocation without the minimum ecological evidence required to assess the likely effect of development on legally protected species.

That is not merely a question of how much weight should be given to an environmental concern. It is a failure of evidential lawfulness. A site cannot be justified where the Council has not

undertaken the work necessary to understand whether the allocation is even capable of being delivered lawfully.

The same difficulty arises in relation to flood risk. EXAM 133K appears to rely on limited temporal data and assumption-based analysis, while EXAM 130 (including the discussion at paragraphs 3.26 to 3.29) indicates that flood risk has been approached through site design and mitigation rather than by rigorous site selection. That is inconsistent with the purpose of the Sequential Test, which requires lower-risk sites to be preferred in the first instance rather than higher-risk sites being engineered into acceptability after selection.

The evidence base is therefore deficient in at least three respects: it does not lawfully assess protected species implications; it does not provide a robust basis for the HRA screening conclusion; and it does not demonstrate correct application of flood risk policy. According to paragraph 35 of the NPPF, the allocation is not justified.

Habitats Regulations Assessment – Legal Deficiency

The Habitats Regulations Assessment concludes that the allocation gives rise to no likely significant effect. That conclusion is not justified on the material presently available.

First, there is no site-specific survey data addressing bat activity, roost presence, or functional habitat use. Second, there is no ecological evidence establishing the extent to which the site and its adjoining features operate as commuting, foraging, or sheltering habitat for protected species. Third, the conclusion appears to have been reached in circumstances where ecological uncertainty remains unresolved.

The legal position is clear. The approach, as established in retained EU case law and applied in UK habitats law, including *People Over Wind v Coillte Teoranta* and *Holohan v An Bord Pleanála*, confirms that screening must proceed on the basis of complete and precise findings and without relying on mitigation to exclude likely significant effects. In *Holohan v An Bord Pleanála*, the Court further made clear that assessment must address the full ecological function of relevant habitats and species, rather than treating the question as a narrow or abstract exercise.

In the present case, the Council did not have before it complete, precise, and definitive findings on bat use of the site. In the absence of bat emergence surveys, roost identification, and functional habitat assessment, it could not lawfully conclude that there would be no likely significant effect. The HRA screening conclusion is therefore premature, unsupported, and unreliable.

That defect is important because the HRA is part of the foundation upon which the soundness of the allocation rests. If the screening conclusion is legally unsafe, the plan cannot simply proceed on the assumption that ecological effects have been resolved. They have not.

Ecology – European Protected Species (EPS) Constraint

The presence of common pipistrelle and soprano pipistrelle bats introduces a strict statutory control regime. These are European Protected Species protected under the Conservation of Habitats and Species Regulations 2017 and the Wildlife and Countryside Act 1981. Disturbance of bats, destruction of roosts, or damage to places of shelter can amount to criminal offences unless a lawful licence is obtained.

This is important at plan stage because development affecting European Protected Species is not merely a matter of future detailed design. It depends on whether an EPS licence can in fact be secured. Such a licence is contingent upon three derogation tests being met: there must be no satisfactory alternative; there must be imperative reasons of overriding public interest; and the action permitted must maintain the species at favourable conservation status in its natural range.

There is no evidence that those tests can presently be met. There is no assessment of satisfactory alternatives. There is no structured case on imperative reasons of overriding public interest. There is no modelling or properly evidenced conclusion on favourable conservation status. In the absence of these matters, the Council cannot show that the allocation is capable of progressing through the licensing stage.

Accordingly, the protected species issue is not peripheral. It goes to the heart of deliverability and soundness. There is no reasonable evidential basis to conclude that protected species licensing is achievable and so this site cannot be allocated against the plan.

3. Failure of the “Effective” Test

MM411 is not effective because the allocation cannot presently be shown to be deliverable within the plan period. The Council’s case depends on constraints being addressed later, but effectiveness under the NPPF requires more than optimism. It requires a credible basis for delivery.

Where bat constraints arise, survey requirements often extend across appropriate seasons, emergence and activity work may require repeated attendance, and the resulting evidence can in turn necessitate redesign, buffering, timing restrictions, roost compensation, habitat replacement, and a formal licensing process. Each of those stages creates delay; any one of them can substantially affect viability or layout.

More fundamentally, the licensing outcome is uncertain. An EPS licence is not granted simply because development is proposed. If the derogation tests cannot be met, development cannot lawfully proceed in the anticipated form. That means the issue is not merely one of delay but one of fundamental uncertainty as to whether the site can be delivered at all.

In the absence of completed bat surveys and EPS assessment, there is no evidential basis upon which the Council can conclude that development is capable of proceeding within the plan period. The allocation is therefore not merely uncertain; it is speculative and incapable of being demonstrated as deliverable. That renders it ineffective and unsound.

4. Inconsistency with National Policy

The allocation is inconsistent with national policy in multiple respects.

First, biodiversity policy requires harm to be avoided, impacts to be properly assessed, and biodiversity outcomes to be addressed based on evidence rather than assumption. The allocation proceeds without the necessary ecological assessment and without demonstrating compliance with the mitigation hierarchy. It therefore conflicts with the NPPF’s biodiversity provisions.

Second, the Council's own evidence appears to contain conflict between EXAM 95 and EXAM 130 on Green Belt justification and exceptional circumstances. If the Council's rationale for releasing or relying upon this site is not coherent within its own evidence base, the plan cannot properly be said to be consistent with national policy on Green Belt release.

Third, flood risk policy requires lawful application of the Sequential Test. If flood risk has been managed through post-selection site design rather than through rigorous selection of lower-risk sites, that is inconsistent with national policy. The problem is not cured by saying that mitigation is possible. Sequential policy exists to influence allocation choices before mitigation is reached for higher-risk land.

For those reasons, MM411 is not consistent with national policy.

5. Procedural Defect

There is also a significant procedural problem. The Council has reversed the correct planning sequence by allocating first and investigating later. Known ecological constraints, including the presence of protected bat species, were not properly assessed before allocation was advanced. Instead, assessment was deferred.

That approach is procedurally unsound. Assessment must inform allocation. It is not lawful or rational to reserve critical evidence gathering until after a site has been embedded in the plan as though suitability were already established.

The same criticism applies to reliance on an HRA screening conclusion reached without the underlying ecological evidence necessary to support it. The process has therefore not merely produced a weak conclusion; it has adopted the wrong order of decision-making.

6. Supporting Habitat Evidence

The presence of wider wildlife, including foxes, pheasants and owls, supports the conclusion that the site comprises established habitat with functioning ecological characteristics and relatively low disturbance.

This, in turn, reinforces the presence of protected species and underlines the inappropriateness of advancing allocation in the absence of proper ecological assessment.

7. Legal Risk

The Plan is exposed to clear legal risk if MM411 proceeds unamended. The defects identified above are not confined to planning judgment. They include failure to consider material ecological constraints properly, reliance on an HRA screening conclusion unsupported by complete evidence, and advancement of an allocation whose deliverability depends upon uncertain protected species licensing outcomes.

Those matters create at least two forms of risk. First, they provide an examination-level basis for finding the modification unsound. Second, if the plan were nevertheless adopted in this form, they create a real prospect of subsequent legal challenge on public law and habitats grounds.

That is especially so where the Council cannot presently demonstrate that the legal tests relevant to protected species licensing could be met, yet they invite the examination to proceed

on the premise that the site is deliverable. It is not enough to say that these matters can be revisited later. If they undermine deliverability now, they undermine soundness now.

8. Conclusion

MM411 fails the tests of soundness in multiple and independently sufficient respects.

The allocation is not justified because the evidence base is incomplete and legally inadequate. It is not effective because there is no credible evidential basis for concluding that development can proceed lawfully within the plan period. It is not consistent with national policy because biodiversity, Green Belt, and flood risk requirements have not been met on a robust evidence base.

The HRA is legally defective, the protected species implications have not been properly assessed, and the Council cannot demonstrate that EPS licensing is achievable. These are not matters capable of being dismissed as fine-tuning for later stages. They are fundamental defects in the case for allocation.

9. Remedy Sought

The only sound and lawful outcome is deletion of MM411 and removal of allocation S02502 (SES30). The examination should not treat the allocation as justified, effective, or legally secure.

References

EXAM 133K – SFRA
EXAM 153 – Ecology
EXAM 130 – Site Selection
EXAM 94 – Methodology
EXAM 95 – Green Belt
National Planning Policy Framework (2023)
Conservation of Habitats and Species Regulations 2017
Wildlife and Countryside Act 1981
People Over Wind v Coillte Teoranta
Holohan v An Bord Pleanála

REF5.0165

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

From Laura Dean [REDACTED]
Date Wed 2026-04-29 6:50 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Strategic Planning Team,

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

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

I therefore set out below my objections to specific modifications.

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

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

Modifications Consultation (referred to in this document as IIA from this point, which can be found here) confirms that 'permanent negative effects would remain' on the

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

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

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

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

development of approximately 1,600 new homes in this part of the city (Draft Sheffield Local Plan Interactive Map and Sheffield Additional Site Allocations), growth that would ordinarily require a new primary school if delivered as a single strategic development.

However the plan fails to demonstrate that essential education infrastructure can

support the proposed level of growth. 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.

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This is particularly important for the S12 area, where transport is a significant concern in

relation to the scale of development proposed. The Sheffield Local Plan identifies approximately 1,600 new homes across S12, which will inevitably generate a substantial increase in traffic movements and place additional pressure on an already constrained local road network. However, due to the dispersed spatial distribution of these allocations, there is currently no clear or coordinated transport strategy demonstrating how the cumulative impact of these developments will be mitigated. The plan does not provide sufficient detail regarding required junction improvements, public transport capacity, pedestrian and cycling infrastructure, or wider highway mitigation measures necessary to support this level of growth. Without clear and deliverable transport commitments, there is a risk that the cumulative traffic impacts will significantly worsen congestion, reduce road safety, and undermine the sustainability of the area. Paragraph 5.6.5. If the IIA states that site SS19 'benefits from its proximity to the blue tram route and a high-frequency bus corridor', however, the lived experience of current residents is that this route is already under pressure during peak times and buses are infrequent and unreliable. As such, it is unclear how the proposed level of housing growth in S12 can be accommodated without substantial and clearly defined transport infrastructure improvements.

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


Thanks

Dr Laura Dean

REF5.0166

Response to local plan

From Sarah Crookes [REDACTED]
Date Wed 2026-04-29 7:38 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

 1 attachment (12 KB)
Sarah response.docx;

External email

[REDACTED]

Hi

Please find enclosed my response to the NEDCC plans. The reasons for my objection to Greenbelt erosion stand and I wish to add my objection to the site specific SS19. (This is proposed along side NEDDC site 45900, White Lane Farm mentioned in my response)

These sites both will have direct effect on our village, Ridgeway and to the environment and wildfire as set out in my proposal.

Thanks

Sarah Crookes
[REDACTED]

----- Forwarded message -----

From: Sarah Crookes [REDACTED]
Date: Thu, 23 Apr 2026, 16:35
Subject: Sarah response to Local Plan
To: Sarah Crookes [REDACTED]

Response to NEDDC Local Plan/Housing Strategy

To: Local Plan Team, North East Derbyshire District Council

Email: [REDACTED]

Subject: Representation on Local Plan Issues and Options Consultation

Dear Planning Policy Team,

I am writing to submit my formal representation regarding the Emerging Local Plan 2024-2034].

1. Nature of Representation

- Object to site ID 45900, from the Archaeological Officer Comments, Large site, bronze palstave MDR5415 found adjacent, recommend archaeological evaluation (geophysics in first instance). Amber = significant archaeological/historic environment issues; might be suitable for allocation with appropriate site specific policy.
- Object to site ID 45097, from the Historical and Cultural Heritage - LAA Officer Comments, Within the Moss Valley Conservation Area and within 100m of a Listed Building. Impact Level: Major.
- Object to site ID 45388, from the Ecology/Biodiversity Officer Comments, A valuable mosaic of habitats likely to support protected species and be of value locally. Whilst it might be possible for part of the site to be developed and larger scale development of the whole site would result in significant local habitat loss and erosion of the wildlife corridor through this area.
- Object to site ID 45292, from the Landscape Character - LAA Officer Comments, the site poorly relates to the existing settlement pattern and would constitute significant built development in the countryside.
- Object to site ID 45096, from the Landscape Character - LAA Officer Comments, the site poorly relates to the existing settlement pattern and development would constitute ribbon development along Main Road.
- Object to site ID 45169, from the Sustainable Communities - LAA Officer Comments, the site is not located adjacent to an existing settlement. and falls within a countryside location. Awaiting results of 2026 Green Belt Review.

2. Key Areas of Concern

- Infrastructure Capacity: The proposed scale of development does not match existing infrastructure. Specifically, local services such as [GP surgeries, schools, and transport links] are already at capacity and cannot sustain further growth without significant upgrading. Who will be responsible Sheffield/NEDCC? Worry is that neither will take control and make sure

there's increased capacity for access to community services. So local existing services/amenities become stretched and broken.

- Green Belt & Landscape: I object to the allocation of sites within the Green Belt. National policy requires "exceptional circumstances" to be demonstrated, and I believe the council should prioritize brownfield sites or areas outside the Green Belt first. Ridgeway and adjacent Ford hamlet is believed to be about 700 years old and would have been part of Sherwood Forest. It's also included in the Moss valley conservation area. How can building more houses be even a consideration here?
- The area has many native wildlife including bats, deer, badgers, foxes, wood peckers, kingfishers, variety of ducks including mandarin, Canada geese, wag tails etc. The Yellow Wagtail (*Motacilla flava*) is considered rare and of conservation concern in the UK. Due to severe population declines (over 70% decrease between 1970 and 2010), they are on the Red List of conservation concern. They are summer visitors (April–October) that breed primarily on farmland in eastern and central England. (From RSPB) and are frequently seen in the Ridgeway/Ford area. This would be greatly affected by any building works and influx of extra housing and people. The area sees a substantial amount of walkers and wildlife visitors annually due to the spectacular views, wildlife/ bird watching and unspoilt landscape. There are also farming livestock of cows and sheep (and also horses.) Horses are regularly rode along the Ridgeway/ Ford roads and bridal paths. All would be greatly at risk with any construction vehicles and influx of more houses into the area. Louise Sandher-Jones MP Member of Parliament for North East Derbyshire has met with the British Horse Society around the welfare and safety of horses and their riders on our local roads.
- Green belt needs protection not building. Risk of urban sprawl without the green areas for people and wildlife to thrive in and enjoy. Once this is lost its lost forever and sets precedent for future erosion. Area will become more noisy, more lit up at night, again this impacts on wildlife, migrating birds etc. The area is a predominantly farming area. Farmers are already struggling to make a living. Where will the jobs be for all the people moving into the area.
- Flood Risk & Drainage: The proposed development in these areas poses a significant risk to surface water run-off and local flooding, as seen in previous

developments, Ford already suffers flooding year round after rainfall. The building of 348 houses taking away natural ground drainage and making large scale concrete/ tarmac water run off will only impact this more. Opposingly in the drier weather due to building the water causes will be reduced leading to dry river beds, causing the further loss of wildlife for example, fish and kingfishers

- Roads and Transport: Most houses have at least 2 cars. Bringing potentially over a thousand new cars to the area (for example site 45900) the increase of air pollution, noise pollution etc and the impact of this on people's physical and mental health. Roads are hardly coping with the levels of traffic as it is. White Lane is a narrow road, used as cut through to both motorway, Rotherham area etc along high Lane to Quarry Hill and then also to Chesterfield via Ridgeway Moor. So whether people are traveling to the M1 south or north they'll both initially use White Lane. Sadly there has been RTA fatalities on White Lane, recently the speed limit has been reduced. People still speed though and overtake dangerously. The roads have no potential to be widened or changed. They're small, narrow country lanes which struggle with the existing vehicles (farm machinery, buses, single and double, cars, vans, lorries. The local public transport is sporadic and often struggle to navigate the narrow roads, as it exists. Will there be further buses deployed to encourage more journeys by public transport?
- Local amenities: Access to local amenities GPs, schools, youth clubs/services will be effected.. According to the Ridgeway Primary school website their Reception and Year 2 classes are currently full, how will any influx of families be accommodated. How will residents access primary (GPs, midwives etc) and secondary (hospitals) care? Current services already over stretched and bringing in another 348 (652 with Sheffield plans alongside) houses seems incredible. Eckington Active as an example of local leisure facilities, have many classes that are already over subscribed. Where will new families be encouraged to swim/exercise when they move into the area? The local police appear to be forever overwhelmed, fire fighting from one nuisance, ie uninsured youths on motorbike and burglaries to the next emergency. Will the numbers of personnel be increased to cope with the additional demands?

- Community spirit and identity will be lost. Becomes a large sprawling continuous estate. Potential to have higher of uncontrollable issues like drug use, youth anti social behaviour. Given current climate of social deprivation (high levels of unemployment etc) lack of youth services, youth clubs etc

3. Conclusion

As a local resident I'm against the erosion of greenbelt and believe it should be protected at all costs. We are custodians of this precious commodity and the amazing wildlife that it homes. Some that are incredibly rare and need protecting. I feel that brownfield sites are these that should be used for the building of future homes, even if this is a more costly route.

We are very lucky to be about to live in North East Derbyshire and mainly because we respect and enjoy the greenbelt and wildlife. Many people from outside our area realise this come to enjoy spending time, walking with family and friends etc. Once it's gone it's gone forever. Can I request to be kept informed of the progress of this plan and any future public consultations.

Yours faithfully,

Sarah Crookes



REF5.0167

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

From [REDACTED]
Date Wed 2026-04-29 8:28 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>
Cc [REDACTED]

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.

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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,

Carole Simpson

REF5.0168

Response to Local Plan

From Sean McDaid [REDACTED]
Date Wed 2026-04-29 8:34 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

 1 attachment (217 KB)
template.docx;

External email

[REDACTED]

Hi

Please find enclosed my response to the NEDCC plans. The reasons for my objection to Greenbelt erosion stand and I wish to add my objection to the site specific SS19. (This is proposed along side NEDDC site 45900, White Lane Farm mentioned in my response)

These sites both will have direct effect on our village, Ridgeway and to the environment and wildlife as set out in my proposal.

Thanks

Sean McDaid

[REDACTED]

Response to NEDDC Local Plan/Housing Strategy

To: Local Plan Team, North East Derbyshire District Council

Email: [REDACTED]

Subject: Representation on Local Plan Issues and Options Consultation

Dear Planning Policy Team,

I am writing to submit my formal representation regarding the Emerging Local Plan 2024-2034].

1. Nature of Representation

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- Object to site ID 45097, from the Historical and Cultural Heritage - LAA Officer Comments, Within the Moss Valley Conservation Area and within 100m of a Listed Building. Impact Level: Major.
- Object to site ID 45388, from the Ecology/Biodiversity Officer Comments, A valuable mosaic of habitats likely to support protected species and be of value locally. Whilst it might be possible for part of the site to be developed and larger scale development of the whole site would result in significant local habitat loss and erosion of the wildlife corridor through this area.
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- Object to site ID 45169, from the Sustainable Communities - LAA Officer Comments, the site is not located adjacent to an existing settlement. and falls within a countryside location. Awaiting results of 2026 Green Belt Review.

2. Key Areas of Concern

- Infrastructure Capacity: The proposed scale of development does not match existing infrastructure. Specifically, local services such as [GP surgeries, schools, and transport links] are already at capacity and cannot sustain further

growth without significant upgrading. Who will be responsible Sheffield/NEDCC? Worry is that neither will take control and make sure there's increased capacity for access to community services. So local existing services/amenities become stretched and broken.

- Green Belt & Landscape: I object to the allocation of sites within the Green Belt. National policy requires "exceptional circumstances" to be demonstrated, and I believe the council should prioritize brownfield sites or areas outside the Green Belt first. Ridgeway and adjacent Ford hamlet is believed to be about 700 years old and would have been part of Sherwood Forest. It's also included in the Moss valley conservation area. How can building more houses be even a consideration here?
- The area has many native wildlife including bats, deer, badgers, foxes, wood peckers, kingfishers, variety of ducks including mandarin, Canada geese, wag tails etc. The Yellow Wagtail (*Motacilla flava*) is considered rare and of conservation concern in the UK. Due to severe population declines (over 70% decrease between 1970 and 2010), they are on the Red List of conservation concern. They are summer visitors (April–October) that breed primarily on farmland in eastern and central England. (From RSPB) and are frequently seen in the Ridgeway/Ford area. This would be greatly affected by any building works and influx of extra housing and people. The area sees a substantial amount of walkers and wildlife visitors annually due to the spectacular views, wildlife/ bird watching and unspoilt landscape. There are also farming livestock of cows and sheep (and also horses.) Horses are regularly rode along the Ridgeway/ Ford roads and bridal paths. All would be greatly at risk with any construction vehicles and influx of more houses into the area. Louise Sandher-Jones MP Member of Parliament for North East Derbyshire has met with the British Horse Society around the welfare and safety of horses and their riders on our local roads.
- Green belt needs protection not building. Risk of urban sprawl without the green areas for people and wildlife to thrive in and enjoy. Once this is lost its lost forever and sets precedent for future erosion. Area will become more noisy, more lit up at night, again this impacts on wildlife, migrating birds etc. The area is a predominantly farming area. Farmers are already struggling to make a living. Where will the jobs be for all the people moving into the area.

- Flood Risk & Drainage: The proposed development in these areas poses a significant risk to surface water run-off and local flooding, as seen in previous developments, Ford already suffers flooding year round after rainfall. The building of 348 houses taking away natural ground drainage and making large scale concrete/ tarmac water run off will only impact this more. Opposingly in the drier weather due to building the water causes will be reduced leading to dry river beds, causing the further loss of wildlife for example, fish and kingfishers
- Roads and Transport: Most houses have at least 2 cars. Bringing potentially over a thousand new cars to the area (for example site 45900) the increase of air pollution, noise pollution etc and the impact of this on people's physical and mental health. Roads are hardly coping with the levels of traffic as it is. White Lane is a narrow road, used as cut through to both motorway, Rotherham area etc along high Lane to Quarry Hill and then also to Chesterfield via Ridgeway Moor. So whether people are traveling to the M1 south or north they'll both initially use White Lane. Sadly there has been RTA fatalities on White Lane, recently the speed limit has been reduced. People still speed though and overtake dangerously. The roads have no potential to be widened or changed. They're small, narrow country lanes which struggle with the existing vehicles (farm machinery, buses, single and double, cars, vans, lorries. The local public transport is sporadic and often struggle to navigate the narrow roads, as it exists. Will there be further buses deployed to encourage more journeys by public transport?
- Local amenities: Access to local amenities GPs, schools, youth clubs/services will be effected.. According to the Ridgeway Primary school website their Reception and Year 2 classes are currently full, how will any influx of families be accommodated. How will residents access primary (GPs, midwives etc) and secondary (hospitals) care? Current services already over stretched and bringing in another 348 (652 with Sheffield plans alongside) houses seems incredible. Eckington Active as an example of local leisure facilities, have many classes that are already over subscribed. Where will new families be encouraged to swim/exercise when they move into the area? The local police appear to be forever overwhelmed, fire fighting from one nuisance, ie

uninsured youths on motorbike and burglaries to the next emergency. Will the numbers of personnel be increased to cope with the additional demands?

- Community spirit and identity will be lost. Becomes a large sprawling continuous estate. Potential to have higher of uncontrollable issues like drug use, youth anti social behaviour. Given current climate of social deprivation (high levels of unemployment etc) lack of youth services, youth clubs etc

3. Conclusion

As a local resident I'm against the erosion of greenbelt and believe it should be protected at all costs. We are custodians of this precious commodity and the amazing wildlife that it homes. Some that are incredibly rare and need protecting. I feel that brownfield sites are these that should be used for the building of future homes, even if this is a more costly route.

We are very lucky to be about to live in North East Derbyshire and mainly because we respect and enjoy the greenbelt and wildlife. Many people from outside our area realise this come to enjoy spending time, walking with family and friends etc. Once it's gone it's gone forever. Can I request to be kept informed of the progress of this plan and any future public consultations.

Yours faithfully,

Sean McDaid



23rd April 2026

REF5.0169

Objection to the Proposed Main Modifications to the Sheffield

From Michael Naylor [REDACTED]
Date Wed 2026-04-29 10:38 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>
Cc [REDACTED]



To: sheffieldplan@sheffield.gov.uk
Subject: **Objection to the Proposed Main Modifications to the Sheffield Local Plan- site SS19**

Dear Strategic Planning Team,

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

For these reasons, looking at the the proposed modifications objectively, they 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 would like to set out below all my objections to these specific modifications.

MM7:

This redefines the purpose of the Green Belt by highlighting only its role in supporting urban regeneration, and does not take into account the full set of Green Belt purposes set out in the NPPF. This narrow and basic wording misrepresents national policy, and weakens the strategic function of the Green Belt. It risks misrepresenting future decision-making by indicating that regeneration is its primary or only purpose.

Sheffield's Green Belt prevents urban sprawl that safeguards the countryside, yet MM7's selective emphasis creates an indiscriminate depiction that could be used to justify further green belt releases. As a result the modification is not justified, is ineffective, and should be amended to reflect the actual, clearly defined complete statutory purposes of the Green Belt.

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

MM10 MM11 MM90-MM93:

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

This represents a substantial proportion of housing delivery being dependent on unallocated and uncertain sites, which are clearly not plan-led. The Plan does not give sufficient evidence to justify that this level of windfall delivery will be realised in a consistent, sustainable, or in a 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 of particular concern given the Plan provides only a very small margin above its housing requirement, meaning any shortfall in windfall delivery would result in the Plan failing to meet its targets.

MM18:

With SS19 being one of the first green belt sites to be developed, and a year 7 place deficit until 2028/29, this does not provide the assurance that there will be adequate educational provision in the S12 area.

Paragraph 3.2.3 of the Integrated Impact Assessment Report Addendum: Modifications Consultation document states that, if a city centre school was built, it would be unlikely to be ready in time for the forecast peak deficit in places, weakening this mitigation further still. The moderation also fails to address how the educational needs of a post 16 student population, which continues to rise and will peak in 2028/29, will be met. This is a matter of great concern for S12 as the population will increase significantly with the planned development it must be noted that 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 not binding and will not secure delivery. The modification does not commit to a new facility, which is not allocated a site, and does not deal with the spatial discrepancy between need and provision.

S12, which lies outside the Central Sub-Area, is therefore expected to absorb significant residential growth with only one extra consultation room being allocated to the area in the plan, even though we have areas of high deprivation and subsequent poor health outcomes. MM19 does not demonstrate how healthcare needs arising from this growth will be met, and it fails the NPPF tests of effectiveness and justification, and risks exacerbating health inequalities unless it is strengthened.

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

MM20:

The phrase "wherever practicable" is vague and very ambiguous to an unacceptable degree in a policy area which is critical to sustainable development and infrastructure delivery. It does not provide a commitment or assurance that transport improvements will be met and 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 already a major and significant concern with regard to the scale of the development proposed. The Sheffield Local Plan has identified approximately 1,600 new homes across S12, which will inevitably generate a substantial increase in traffic movements and place additional strain on an already burdened 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 increasing traffic impacts will make congestion considerably worse, 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. The number 8 bus is a half hourly service and hourly on Sundays and subject to regular cancellations. At peak times the blue tram has standing room only and people further along the network already face not being able to board the tram. 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. Without any such improvements the transport network will face further strain.

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 decreased 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 reliable picture of what can actually be delivered.

MM429 (SS19):

It is my understanding that the the S12 Green Belt Action Group has provided two previous consultation statements for MM429 (SS19) which highlighted 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 deeply worrying. If SS19's constraints are serious enough to warrant modification text, they should also trigger a revised assessment of its contribution to housing supply. The failure to cross-reference SS19 in the impact recalculation undermines the credibility of the housing trajectory and indicates 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 some very serious concerns regarding compliance with the Duty to Cooperate and further undermines the soundness of the Plan.

Summary

In conclusion, the main modifications fails to 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 demonstrably vague and lack the necessary detail to clearly show 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 would therefore press the Inspectors to insist on further modifications, including the removal or reassessment of SS19, to ensure the Plan is sound.

I appreciate team grateful for the opportunity to consider the Main Modifications so we can ensure the Local Plan remains equitable, viable and fit for purpose.

Yours sincerely,

Michael Naylor



REF5.0170

Objection to Modification Ref MM411

From [REDACTED]
Date Wed 2026-04-29 11:41 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Good Morning

We are emailing in response to the main modification consultation on City wide issues and also SES29 and SES30 (MM411).

We consider it unsound to release site SES30 (MM411) from the Greenbelt.

Having lived in Handsworth for over 60 years the fields have become part of our daily lives, having walked through the fields from taking our children up to primary school to recreational walking for our health and well being. Especially through Covid when we were isolated from family and now for our mental health [REDACTED] and we go walking up the fields around SES30 for exercise and it is also a safe space [REDACTED] to walk with no threat of traffic.

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. There are already serious traffic and road safety issues in the area.

The plan says development would be "subject to further transport assessment indicating safe and suitable access for a development of this scale has not actually been demonstrated.

Also all the traffic going to Handsworth would pass metres from Handsworth Grange School, putting our children at risk of poor air quality.

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 such as Shirtcliffe Valley and improved access and wood land on Flockton Park. These are not suitable or effective compensations for green belt loss on this site.

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.

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.

The Plans numbers don't add up.

We request that SES30 be removed from the plan and kept as Greenbelt.

I would like to be notified of the inspectors final report and the adoption of the plan.

Regards

Mrs B. Dyche and Mr G. Dyche

REF5.0171

Objection to Site SS19

From Linda Tibbles [REDACTED]
Date Wed 2026-04-29 12:26 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[REDACTED]

29/4/26

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,

Linda Tibbles



REF5.0172

Objection to Site SS19

From [REDACTED]
Date Wed 2026-04-29 12:29 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

29 April 2026

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.

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

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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.

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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.

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

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

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

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

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

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,

Alex Tibbles



REF5.0173

Sheffield Plan Consultation on Main Modifications

From Margaret Lea [REDACTED]
Date Wed 2026-04-29 3:11 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Planning Inspector

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

Introduction

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

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

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

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

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

mitigations are deliverable, and provide the **best possible** outcome for the existing community and local wildlife.

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

Additionally, recent evidence suggests that the additional Greenbelt Allocations might not actually be needed as the demographics of Sheffield are changing. Latest ONS data shows a decline in the birth rate and there has also been a significant decline in overseas student numbers (in the thousands). These will both have an impact on the amount and also type of building required in this city to meet its current and future needs. A quote from the Office of National Statistics states "Deaths are projected to outnumber births in the UK every year from 2026, and the population is expected to grow at a slower rate than previously reported. "

Claims that infrastructure will be delivered in advance of , or alongside development are not supported by secured or costed evidence.

The infrastructure delivery depends on viability, phasing, and third-party agreements. Key constraints remain unresolved, and there is no guarantee that required infrastructure will be delivered in line with development. So our community may well be left with gaping holes in its infrastructure as many other developments locally have.

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

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

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

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

The Council acknowledges that:

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

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

They also say that:

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

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

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

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

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

Evidence

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

less safe, and longer.

- Most users of the field use the public footpath accessed from Don Avenue.
- At hearings, the inspector acknowledged the importance of Green/Open Space for residents with Protected Characteristics being close to where they live.

Change Required

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

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

-

FLOOD RISK (ref. MM332 condition point 4)

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

Evidence

- There are many examples of residents' experience of groundwater on the site.

Large areas of the field are often waterlogged during winter months and any extended periods of wet weather. The waterlogged areas can extend significantly up the site and are not just confined to areas in or near the flood plain for Tinker Brook. We have personally been subject to excess water from the neighbouring fields running through our garden at numerous points due to the gradient of the land . Our house sits on the edge of NWS31 where it joins with the field above. Every year we have water pouring through our garden as do my neighbours. We have had to go through many changes and much cost over the years to minimise the damage to our own land and that of our neighbours. Despite this water still comes through, often at changing points, due to the nature of underground streams in the area.
- Problems with groundwater are not just confined to the site, but apply to the whole village and may be in part due to the existence of underground streams, the large areas of clay soil, and the topography of the land. There are currently issues with groundwater affecting the village community centre (currently closed as a result). Water has been seen gushing through garden walls during wet weather on roads close to the site.
- Historically, the development on Don Avenue, adjacent to site NWS31 which shares the same topography, encountered many problems with drainage during construction, including flooding of some nearby houses. Profit margins for the build were claimed to be negatively impacted.
- The site has not yet been assessed with respect to climate change.
- The Environment Agency has recently funded tree planting on site to act as natural flood mitigation. The SFRA identifies larger areas of the site with the potential for further planting. This not only illustrates the existence of a problem here, but also could affect site viability.

REQUIRED CHANGE

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

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

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

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

Evidence

- There is congestion on Dixon Drive and the Brightholmlee Lane junction to Main Road.
- Safety issues around school. SEND pupils etc. and children playing out on the surrounding estate roads.
- Future limited parking provision.
- Access constraints for plant machinery due to narrow roads, parked vehicles and tight bends. Council construction repair works on proposed access roads (Dixon Drive, Brightholmlee Lane) 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, as we are currently experiencing, as a result of the above mentioned repair works.
- Land drain and land slippage across the access point to site needs full investigation.
- Previous development on Don Ave – Building was avoided in the area immediately adjacent to site boundary (approx.. 5m) due to alleged land unsuitability. This needs investigation.
- Local road infrastructure may need improvements to cope with heavy plant machinery and extra traffic.

Changes required

Main Modifications need to specify that:

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

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

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

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

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

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

BIODIVERSITY *(MM332 condition points 8,9,10)*

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

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

In his address to the American Congress only this week King Charles said "As we look toward the next 250 years, we must also reflect on our shared responsibility to safeguard Nature, our most precious and irreplaceable"

Evidence

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

Changes Required

MMs should state that:

1. Further detailed assessment should be carried out for Protected Species present on site or very close to the site and BNG should be adjusted accordingly.

2. BNG for watercourse should be calculated.

3. Mitigations should be put into place for all identified Protected Species and their habitats including suitable buffers and light restrictions around forage areas and flight paths. This should apply to all habitats (bat roosts etc.) identified both on site and within close proximity to site.

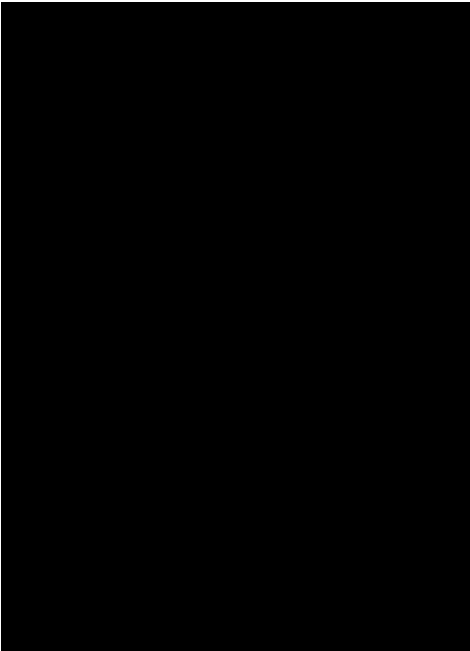
4. Some areas of open grassland should be retained.

AND

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

Yours Sincerely,

Margaret and Maxwell Lea



REF5.0174

Woodland Trust Response to Sheffield Local Plan - Main Modifications Consultation

From William Ward [REDACTED]
Date Wed 2026-04-29 3:53 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

 1 attachment (131 KB)
Sheffield Local Plan - Main Modifications Consultation.pdf;

External email

Dear Sir/Madam,

Please find attached the Woodland Trust's response to the Sheffield Local Plan – Main Modifications Consultation.

Kind regards,

William

William Ward





Sheffield Local Plan – Main Modifications Consultation Response

The Woodland Trust is the UK's leading woodland conservation charity and wants to see a UK that is rich in native woods and trees, for people and wildlife. We aim to achieve this by restoring and improving woodland biodiversity and increasing people's understanding and enjoyment of woods and trees.

We own over 1,275 sites across the UK, covering over 23,580 hectares, and we have around 500,000 members and supporters. The Trust is recognised as a national authority on woods and trees, and the benefits and value that they deliver for climate, nature, and society.

We welcome the opportunity to respond to the Sheffield Local Plan – Main Modifications consultation.

Note: we consider all the policies to be legally compliant and sound unless otherwise stated in the response.

Sheffield Plan Aims and Objectives

The Woodland Trust welcomes the Plan's Aims and Objectives as they currently stand, in particular the objectives around creating an environmentally sustainable city and creating a green city. However, there is scope to strengthen the Plan further to ensure these ambitions translate into measurable and effective action. In particular, we would encourage the following:

- **Identify opportunities for nature recovery and connectivity** by explicitly recognising areas where habitats can be restored and enhanced, and where green corridors can be created to improve ecological networks across the city;
- **Protect and enhance existing green infrastructure and habitats**, including a clear commitment to safeguarding mature and ancient trees, which are irreplaceable assets for biodiversity, climate resilience, and public wellbeing;
- **Ensure the environmental evidence and data base is robust and up to date**, enabling informed decision-making and effective targeting of interventions to support nature recovery and green infrastructure delivery – this includes ensuring Sheffield's records in the Ancient Woodland and Ancient Tree Inventories are as comprehensive and as current as possible;

- **Set a more ambitious, measurable biodiversity target**, such as achieving at least a 20% net increase in biodiversity across Sheffield, to ensure the Plan delivers genuine environmental improvements rather than simply maintaining the status quo.

Policy SP1: Overall Growth Plan

The Woodland Trust welcomes the strategic approach set out in Policy SP1: Overall Growth Plan. However, to ensure that growth is delivered in a genuinely sustainable manner, it is essential that the policy more explicitly recognises and safeguards irreplaceable habitats, including ancient woodland.

We strongly recommend that the policy includes a clear requirement for all proposed development sites to respect and protect natural habitats, particularly existing, long-established, and ancient woodland. These habitats are irreplaceable, and their loss or deterioration cannot be adequately compensated.

In line with national policy set out in the National Planning Policy Framework, development resulting in the loss or deterioration of irreplaceable habitats such as ancient woodland should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy is in place. Policy SP1 should explicitly reflect this requirement to ensure consistency with national guidance.

Furthermore, the Council should make use of the Ancient Woodland Inventory, the Ancient Tree Inventory and related spatial datasets provided by government agencies to identify where designated site allocations may intersect with ancient woodland or its buffer zones. This will enable informed decision-making at an early stage and help avoid the allocation of sites where development would result in unacceptable harm.

To strengthen the policy, we recommend:

- Including explicit wording requiring development to avoid harm to irreplaceable habitats, including ancient woodland and veteran trees;
- Requiring appropriate buffer zones between development and ancient woodland to prevent indirect impacts such as pollution, disturbance, and hydrological changes;
- Ensuring site allocations are informed by up-to-date mapping of ancient woodland and other priority habitats;
- Embedding a clear expectation that development proposals demonstrate how they will avoid encroachment and long-term damage to these habitats.

Policy T1 – Enabling Sustainable Travel

The Woodland Trust welcomes this policy's focus on promoting sustainable and low-carbon transport options, including public transport, walking, and cycling.

However, it is essential that the delivery of new or enhanced transport infrastructure is undertaken in a way that fully respects and protects the natural environment. In line with our position on irreplaceable habitats, we emphasise that any expansion of travel routes, such as new or re-opened rail lines, road schemes to support bus provision, or active travel corridors, must avoid harm to ancient woodland, long-established woodland, and other priority habitats.

Ancient woodland is an irreplaceable habitat, and its loss or deterioration cannot be mitigated or compensated. As set out in the National Planning Policy Framework, development resulting in the loss or deterioration of such habitats should be refused, except in wholly exceptional circumstances. This principle should be clearly embedded within Policy T1.

Policy BG1 – Blue and Green Infrastructure and the Local Nature Recovery Network

The Woodland Trust strongly welcomes this policy, which represents a positive and ambitious commitment to protecting, enhancing, and connecting Sheffield's natural environment.

We are especially encouraged by the policy's clear recognition that, in certain circumstances, biodiversity objectives should be prioritised over human access. This is an important and necessary principle to ensure that sensitive habitats are able to recover and thrive without undue disturbance. Striking the right balance between access and conservation is critical, and this policy appropriately acknowledges that some areas must be managed primarily for nature.

The Woodland Trust also welcomes the explicit reference to the South Yorkshire Local Nature Recovery Strategy. Aligning the Local Plan with the LNRS provides a strong strategic framework for identifying priorities, targeting interventions, and delivering meaningful nature recovery at a landscape scale. This alignment will be key to ensuring that local action contributes effectively to wider regional and national environmental goals.

Thank you for the opportunity to comment on this consultation. We would be happy to meet with you to discuss these issues further.

William Ward
Regional External Affairs Officer – North

REF5.0175

Main modifications consultation

From [REDACTED]
Date Wed 2026-04-29 4:34 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

 1 attachment (35 KB)
NES38_Final_SubmissionMMpersonal.docx;

External email

Hi,

Please find attached my main modifications representation for the attention of the Sheffield Local Plan Inspectors.

Kind Regards

Elizabeth Sadiq

Sheffield Local Plan – Main Modifications Objection

Site NES38 (Holme Lane Farm, Grenoside)

Respondent: Elizabeth Sadiq [REDACTED]

1. Summary

The Main Modifications do not make the Plan sound. Site NES38 remains unsound and reflects wider issues across the Plan, including optimistic assumptions, incomplete evidence, and ambiguous policy wording.

Key Failures:

- Conflict with Inspectors' LWS requirements (MM352 / EXAM 190)
- Unclear and unproven access strategy
- Significant overstatement of capacity (188 dwellings unrealistic)
- Incomplete evidence (no Level 2 SFRA, limited ecology, no heritage assessment)
- Failure to demonstrate reasonable alternatives
- Plan-wide risk to housing delivery
- Procedural fairness concerns

Conclusion: NES38 highlights systemic issues. The Plan remains unsound.

Recommendation: Remove or significantly modify NES38.

2 Introduction

I submit this representation in response to the Main Modifications to the Sheffield Local Plan. I have engaged extensively with the plan-making process, including reviewing examination documents, analysing evidence base materials, and following hearing sessions in detail.

While this representation focuses on Site NES38, it is important to state at the outset that the issues identified are not isolated. They reflect broader and recurring concerns across the Plan as a whole, particularly in relation to the robustness of evidence, the treatment of constraints, and the realism of delivery assumptions.

The Main Modifications do not resolve these issues and instead perpetuate a pattern of reliance on optimistic assumptions, incomplete evidence and internally inconsistent policy wording.

Against this context, Site NES38 serves as a clear and evidenced example of these wider deficiencies.

This representation therefore addresses both:

- The specific unsoundness of Site NES38, and
- The implications this has for the Plan's overall ability to meet the tests of soundness.

3 Summary of Objection

The Main Modifications fail to make the Plan sound in respect of Site NES38.

In particular:

- They do not properly reflect or comply with the Inspectors' requirements regarding protection of the Local Wildlife Site (LWS)
- They rely on unclear, untested and potentially undeliverable access arrangements
- They are not supported by robust or complete evidence
- They materially overstate the developable capacity of the site

As a result, the Plan remains unsound under the tests of being justified, effective, and consistent with national policy (NPPF paragraph 35).

4 Failure to Comply with Inspectors' Requirements – Local Wildlife Site

The Inspectors' post-hearing position (January 2026) clearly requires that:

- No development takes place within Local Wildlife Sites
- Appropriate buffers are applied to ensure their protection

However, the Main Modifications (including MM352 and related wording such as EXAM 190 – Action 15) introduce or retain requirements for site “connectivity” which are not clearly limited to non-intrusive, evidence-led solutions.

The wording:

- Fails to explicitly restrict connectivity to pedestrian/cycle routes only
- Does not make such routes contingent on ecological evidence
- Creates ambiguity that could allow encroachment into the LWS or its buffer

This directly conflicts with the Inspectors' requirement for protection and buffering of the LWS and introduces internal inconsistency within the Plan.

The modification therefore fails to resolve a key issue identified during examination and undermines soundness.

5 Unsoundness – Not Justified (Insufficient Evidence and Alternatives)

The allocation of NES38 continues to rely on incomplete and inadequate evidence, including:

- No clear demonstration of a Level 2 Strategic Flood Risk Assessment, despite known topographical and drainage constraints
- No robust heritage impact assessment, despite historic field patterns and landscape features
- No comprehensive, up-to-date ecological assessment, despite the presence of a Local Wildlife Site and extensive habitat features

Without this evidence, it is not possible to conclude that:

- The site is suitable for development
- Impacts can be mitigated

- The allocation represents the most appropriate option

Furthermore, the Plan does not clearly demonstrate that reasonable alternatives have been fully assessed, as required by the Environmental Assessment of Plans and Programmes Regulations 2004.

The continued reliance on constrained Green Belt sites such as NES38 — where significant ecological, infrastructure and deliverability concerns exist — raises serious doubt as to whether less harmful or more suitable alternatives have been adequately explored and evidenced.

The Plan therefore fails the justified test.

6 Unsoundness – Not Effective (Access and Deliverability)

The Main Modifications rely on the following wording:

“Access... will be required off Fox Hill Road and from Salt Box Lane (east of the Grenoside Grange Hospital and Scout’s and Guide’s building)” (MM352)

This raises significant concerns:

- The wording is ambiguous and may imply multiple access points from Salt Box Lane
- No clear or robust evidence has been provided demonstrating the feasibility of these access arrangements
- The reliance on future “transport assessment work” indicates that deliverability is unresolved

Evidence obtained through FOI requests indicates that multiple access points from Salt Box Lane may be commercially desirable to developers, rather than being driven by robust planning or infrastructure evidence.

As such, the allocation is dependent on speculative and undefined infrastructure assumptions.

A site cannot be considered deliverable where key access arrangements remain uncertain. The Plan therefore fails the effective test.

7 Capacity Overestimation – Failure to Account for Constraints

The stated capacity of approximately 188 dwellings is not credible when site constraints are properly applied.

Significant constraints include:

- At least 50 veteran and mature trees, each requiring substantial root protection buffers (typically ~15m radius)
- Required buffers to the Local Wildlife Site, within which no development should take place
- A pronounced north–south ravine, limiting internal connectivity and layout efficiency
- Notable topographical differences, particularly along the Halifax Road boundary
- The proposed siting of SuDS infrastructure, reducing usable land area

These constraints materially reduce the net developable area.

The capacity figure appears to be based on high-level assumptions rather than a realistic, constraint-led masterplanning approach. This results in a significant overestimation of deliverable housing.

8 Plan-Wide Implications – Housing Supply Risk

This issue extends beyond a single site.

The Inspectors have identified that the Plan has only a limited margin of flexibility in meeting housing requirements (see updated trajectory evidence including EXAM 140 / EXAM 181).

If sites such as NES38 are not capable of delivering their stated capacity:

- The housing supply buffer is eroded
- The Plan's ability to meet its requirement is undermined

This indicates a broader structural issue:

The Plan is reliant on sites whose capacity and deliverability are not robustly evidenced.

This undermines the Plan's overall effectiveness and soundness.

9 Procedural Fairness and Consultation Concerns

It is important to record serious concerns regarding the fairness and effectiveness of the consultation process.

I have:

- Invested substantial time reviewing complex and technical documentation
- Submitted detailed and evidence-based representations

- Engaged in good faith throughout the process

However, the structure and delivery of the consultation has made meaningful participation difficult.

In particular:

- The volume and technical nature of documentation presents a significant barrier to effective engagement
- The introduction of new or amended material during consultation periods has limited my ability to respond on a fully informed basis

These issues raise legitimate concerns in relation to established principles of fair consultation, including whether:

- People have been given a genuine opportunity to influence outcomes
- Decision-making has properly taken account of representations received

While these concerns do not in themselves determine soundness, they reinforce the need for a cautious and evidence-led approach — particularly where significant harm may arise from allocations such as NES38.

10 Conclusion

The Main Modifications do not resolve the fundamental issues affecting Site NES38 and instead perpetuate a wider pattern of reliance on optimistic assumptions, incomplete evidence, and ambiguous policy wording.

The allocation remains:

- Unsupported by robust and complete evidence

- Dependent on unclear and potentially unachievable infrastructure
- In conflict with the Inspectors' requirements regarding LWS protection
- Based on a significantly overstated assessment of capacity

Taken together, these issues demonstrate that NES38 is not an isolated concern, but part of a broader problem affecting the Plan as a whole.

Given the limited margin for error in the housing supply and the reliance on sites with unresolved constraints, the Plan cannot be considered sufficiently robust or deliverable.

As such, the Main Modifications fail to make the Plan sound.

11 Recommendation

Site NES38 should be:

- Removed from the Plan, or
- Subject to substantial modification, including:
 - A significant reduction in capacity
 - Clear and enforceable protection of the Local Wildlife Site and buffers
 - Demonstrated, evidence-based access arrangements
 - Completion of necessary ecological, flood risk, and heritage assessments

REF5.0176

SS19 planing team

From MICHAEL ROWLEY [REDACTED]
Date Wed 2026-04-29 6:01 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Strategic Planning Team,

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

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

I therefore set out below my objections to specific modifications.

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

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

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

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

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

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

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

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

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

Concerns around the impact of development on health and wellbeing are supported by the revised IIA (which can be found [here](#)) which states that ‘some new site allocations may reduce the overall amenity experienced by nearby residents. Although the Plan already

includes measures to minimise these effects, it is unlikely that all remaining negative impacts can be fully avoided'. Paragraph 5.2.2 of this document also acknowledges that removal of greenbelt will have 'some negative effects in terms of mental health and wellbeing' on surrounding communities.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Yours


Michael Rowley



REF5.0177

Site SES03 Schedule of Proposed Main modifications to the Sheffield Plan

From Paul Taylor [REDACTED]
Date Wed 2026-04-29 6:34 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

 1 attachment (44 KB)
EckingtonWay_Objection-final.docx;

External email

Please find attached my submission and reasons for objecting to the plan at Eckington Way.

Paul Taylor
[REDACTED]

FORMAL REPRESENTATION

Objection to the Proposed Allocation of Land off Eckington Way

Sheffield Local Plan (Examination Draft)

Submitted to: Sheffield City Council

1. Introduction and Summary of Objection

This representation objects in the strongest possible terms to the proposed allocation of Green Belt land off Eckington Way, near Crystal Peaks, Sheffield, for industrial use and a travelling showpeople's site, as set out in the Sheffield Local Plan.

This objection is grounded entirely in evidence produced or acknowledged by Sheffield City Council itself. The cumulative weight of that evidence spanning illegal air quality breaches, roads already beyond capacity, the cancellation of the public transport scheme used to justify the allocation, the confirmed presence of two Red List protected species nesting on the site, and the classification of the land as Best and Most Versatile (BMV) agricultural land is such that the allocation cannot be considered sound within the meaning of the National Planning Policy Framework (NPPF, December 2024).

This objection is supported by the following elected representatives:

- Clive Betts MP, Sheffield South East, who has stated publicly: 'There is robust evidence that over-development in the south east area has been continuous for some time now and the existing transport network is already over capacity.'
- Liberal Democrat ward councillors for the area, who have described the proposals as deeply inappropriate.
- The Council's own officers, whose technical evidence on air quality, transport, ecology and agricultural land, raises serious concerns that the Council has failed to adequately address.

2. Ground 1: Unlawful Air Quality - Ongoing Legal Breach at the Site

The Council's own monitoring data recorded illegal NO₂ levels adjacent to the proposed site for four consecutive years.

The Council's monitoring station at Moss Way/Donetsk Way, located directly adjacent to the proposed development site, recorded annual mean NO₂ concentrations of 46, 47, 46 and 48 µg/m³ between 2012 and 2015 inclusive. The legal limit under UK law (the Air Quality Standards Regulations 2010) is an annual mean of 40 µg/m³.

This site therefore exceeded the legal limit in every single year for which data was recorded. At its worst, readings reached 48 µg/m³ 20% above the statutory threshold. This

is not a marginal technical breach; it represents a sustained and significant failure of air quality at the precise location being proposed for major new industrial development.

Critical point: The monitoring was then discontinued. When a Freedom of Information request was submitted asking why monitoring had ceased, the Council's response was unambiguous: 'We do not hold information about the decision making process as to why monitoring stopped.' There is no record of any decision, no justification, and no evidence that alternative monitoring was commissioned. There is currently no active air quality monitoring in the vicinity of Eckington Way.

The NPPF (December 2024) is explicit at paragraph 180(e) that new development should not expose future users or occupiers to 'unacceptable levels of air pollution' and that development should 'wherever possible, help to improve local environmental conditions such as air quality.' Allocating land for industrial use which will by its nature attract Heavy Goods Vehicles and other high-emission commercial traffic in an area that has demonstrably and repeatedly exceeded legal NO₂ limits is directly contrary to this requirement.

Sheffield City Council declared an Air Quality Management Area (AQMA) across the urban area of the city in March 2010 on the basis that NO₂ objectives were not being met. The proposed site sits within or immediately adjacent to this AQMA. Permitting additional industrial development in such a location, without current monitoring data and without a credible Air Quality Assessment, is procedurally and legally indefensible.

The allocation should be removed until:

- Monitoring is reinstated at the Moss Way/Donetsk Way location or an equivalent site immediately adjacent to the proposed development;
- Annual mean NO₂ levels are confirmed to be below 40 µg/m³; and
- A full air quality impact assessment is conducted taking into account the additional traffic generated by the proposed industrial uses.

3. Ground 2: Road Network at Capacity - No Mitigation in Place or Planned

The Council's own transport evidence shows junctions on Eckington Way operating at 101–118% capacity

The Council's transport evidence base, submitted as part of the Sheffield Local Plan examination, demonstrates that key junctions along Eckington Way are already operating at between 101% and 118% of their design capacity. A junction operating above 100% capacity is, by definition, functioning beyond its design threshold.

This evidence was not challenged by the Council. Indeed, the Council's own Head of Transport confirmed at the public examination hearing that there are no plans to improve the road network in this area. No funding has been identified. No scheme is in development. No mitigation has been proposed.

This admission is made all the more serious by the fact that the transport evidence base was produced before the latest round of Green Belt allocations including the Eckington Way site were confirmed. The cumulative impact of those allocations on the road network has not been properly assessed.

A senior councillor personally witnessed gridlock at the access roundabout, then voted to approve the development

The inadequacy of the existing road network is not merely a matter of technical data. It has been directly and personally witnessed by Councillor Ben Miskell, Chair of the Transport, Regeneration and Climate Policy Committee one of the most senior transport decision-makers in the Council who attended the roundabout in question alongside local residents to observe traffic conditions at the proposed access point for the industrial units and permanent travelling showman site.

During that visit, the roundabout was subject to heavy congestion, with gridlock affecting all four approaches, conditions that local residents report occur on a frequent basis. Councillor Miskell directly witnessed these conditions and, in remarks made to those present, acknowledged the fundamental inadequacy of the existing infrastructure, stating: "the infrastructure here clearly was never designed for the level of traffic that we now see."

This is a significant admission. The Chair of the Transport, Regeneration and Climate Policy Committee personally attended the site, personally observed gridlock across all four approaches, and personally acknowledged that the infrastructure was never designed for current traffic levels let alone the additional traffic that would be generated by the proposed industrial development and permanent travelling showpeople's site.

Despite this first-hand observation, Councillor Miskell subsequently voted in favour of progressing the proposed development. No explanation has been provided as to how the observed operational reality of the highway network acknowledged in his own words on site was weighed in that decision. This raises a serious question about whether the decision-making process has given adequate and rational consideration to the highway evidence, and whether the Council has discharged its obligations under NPPF paragraph 109 in good faith.

NPPF paragraph 109 states that development should only be refused on highway grounds if 'the residual cumulative impacts on the road network would be severe.' The Council's own technical evidence establishes that the road network is already at or beyond capacity before any development is built. The first-hand account of a senior councillor confirms that gridlock at the access roundabout is a present and frequently occurring reality. The addition of industrial uses attracting significant HGV movements and staff vehicles on a road system with no identified mitigation represents exactly the kind of severe cumulative impact that warrants refusal. The failure to plan for or fund road improvements before allocation, in the face of both technical evidence and direct personal observation by a decision-maker, is a fundamental soundness failure.

4. Ground 3: The Public Transport Justification Has Collapsed

The Barrow Hill Line reopening, the primary public transport justification for the allocation, was cancelled in July 2024

A central element of the sustainability case for the Eckington Way allocation was the proposed reopening of the Barrow Hill Line a freight-only railway between Sheffield and Chesterfield to passenger services, including proposed stations at Beighton and Eckington/Renishaw that would have provided a rail link to the area.

The scheme was progressed under the Government's 'Restoring Your Railway' programme and received Government approval in principle. However, in July 2024, Chancellor Rachel Reeves announced the termination of the Restoring Your Railway programme, citing a £22 billion gap in public funding. The cancellation directly and immediately rendered the Barrow Hill Line reopening unviable. There is no alternative funding stream identified. There is no replacement scheme. The line remains freight-only with no realistic prospect of passenger reinstatement within the Local Plan period.

The site has been assessed and scored at the worst possible rating for public transport accessibility. With the Barrow Hill Line scheme now cancelled, there is no credible mechanism by which public transport accessibility to this location can be improved to a level appropriate for major employment development.

NPPF paragraph 104 requires planning authorities to 'prioritise development in locations that are or can be made sustainable.' Sustainability in this context must be evidenced and deliverable not aspirational. An allocation justified, in part, by a transport scheme that has since been cancelled cannot now be considered sustainable on the same terms. The Council must either demonstrate a credible, funded alternative transport improvement scheme or accept that the sustainability case for this site has fundamentally broken down.

5. Ground 4: Confirmed Nesting of Two Legally Protected Red List Species

Skylark and Greenfinch, both UK Red List species, have been confirmed nesting on the site. A Skylark was personally observed overhead by the MP, the Co-Chair of the Transport Committee, and other councillors during a site visit in March 2023. No ecological survey has ever been conducted.

The site has confirmed nesting populations of two separate Red List bird species: Skylark (*Alauda arvensis*) and Greenfinch (*Chloris chloris*). The presence of two independently Red-listed breeding species on an unsurveyed site elevates the ecological significance of this location to a level that makes the absence of any survey work not merely inadequate, but indefensible.

The presence of Skylark on this site is not disputed or theoretical. In late February/Early March 2023, a site visit took place attended by MP Clive Betts, Councillor Iqbal (Co-Chair of the Transport, Regeneration and Climate Policy Committee and a member of the cross-

party working group overseeing the Draft Local Plan), and a number of other councillors. During that visit, a Skylark was observed in flight directly overhead. It was noted by those present that, given the time of year and the nature of the habitat, the group were in all likelihood standing in the field in close proximity to an active nest. Neither the MP nor any of the councillors present disputed this observation or raised any challenge to it.

The significance of this cannot be overstated. Senior elected representatives, including a member of the very working group responsible for overseeing the Draft Local Plan, stood on this land and personally witnessed a Red List breeding species overhead, in nesting season, on the site they were in the process of allocating for industrial development. That observation was made in March 2023. The allocation has continued to progress since that date without any ecological survey being commissioned. The confirmation of this visit is documented in writing, dated 13 March 2023.

The Skylark is listed on the UK Red List of Birds of Conservation Concern, meaning it is classified as a species of the highest conservation concern in the United Kingdom. The national Skylark population has declined by approximately 62% since the mid-1970s, driven predominantly by the loss of open grassland and arable farmland habitat precisely the type of habitat present on this site.

The Greenfinch was added to the UK Red List in December 2021 under the fifth Birds of Conservation Concern review (BoCC5), published jointly by the BTO, JNCC, RSPB and partner organisations. Critically, the Greenfinch made the most severe category upgrade possible moving directly from the Green List to the Red List in a single assessment cycle. This direct Green-to-Red listing reflects the speed and severity of the species' collapse: the UK Greenfinch population has declined by approximately 62% since 1993, driven primarily by Trichomonosis, a parasitic disease of the digestive tract that causes mass mortality events. The BTO's Breeding Bird Survey has recorded worsening Greenfinch declines for more than a decade. It is now considered one of the most rapidly deteriorating formerly common species in the UK.

Both species are fully protected under the Wildlife and Countryside Act 1981 (as amended). It is a criminal offence to intentionally kill, injure or take any wild bird, to intentionally damage or destroy the nest of any wild bird while it is in use or being built, or to intentionally take or destroy the eggs of any wild bird. Development that destroys active nesting habitat during the breeding season without an appropriate licence and mitigation strategy constitutes a criminal offence.

The critical failing in this case is that, despite a Skylark being personally observed overhead by the MP and senior councillors during the March 2023 site visit, and despite confirmed nesting of both Red List species, no ecological survey of the site has ever been commissioned or carried out. There has been no Phase 1 Habitat Survey, no breeding bird survey, and no assessment of the site's value as wildlife habitat. The Council does not know what other species are present, what habitats exist across the site, or what the full ecological impact of development would be. This is not an oversight that can be attributed to lack of awareness. Senior decision-makers were on this land and saw the evidence with their own eyes.

The NPPF at paragraph 180(d) requires that planning policies and decisions 'minimise impacts on and provide net gains for biodiversity.' At paragraph 186, it states that 'development resulting in the loss or deterioration of irreplaceable habitats should be refused.' Open grassland actively supporting two nesting Red List species is precisely the type of habitat the NPPF and the Environment Act 2021 which sets a legally binding target to halt species decline by 2030 are designed to protect, not destroy.

No development of this site should be permitted, and no allocation should be maintained, without:

- A full Phase 1 Habitat Survey of the site;
- A breeding bird survey conducted over at least two full seasons, covering both Skylark and Greenfinch territories;
- An assessment of the site's contribution to wider ecological networks;
- Credible, independently assessed mitigation strategies for both confirmed Red List nesting species; and
- A Biodiversity Net Gain assessment demonstrating how development could achieve a measurable uplift rather than a net loss.

6. Ground 5: Loss of Best and Most Versatile Agricultural Land

The site is confirmed Grade 2 BMV agricultural land. The NPPF requires lower-quality land to be preferred.

The Council's own officers have confirmed that the Eckington Way site contains Grade 2 agricultural land under the Agricultural Land Classification (ALC) system. Grade 2 land falls within the Best and Most Versatile (BMV) category and is high quality, versatile farmland capable of producing a wide range of arable and horticultural crops. It is among the most productive land in England.

The NPPF (December 2024) at paragraphs 170-171 requires planning authorities to recognise the economic and other benefits of BMV agricultural land and to allocate 'land with the least environmental value, where consistent with other policies.' It further states that 'where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.'

The Council has not demonstrated that lower-quality land cannot meet the identified employment need. The brownfield-first approach, strengthened under NPPF December 2024 (paragraph 124), requires that a clear sequential case is made for this site over brownfield and lower-grade agricultural alternatives. That case has not been made.

The loss of Grade 2 agricultural land to permanent industrial development is irreversible. At a time of heightened national concern about food security, domestic agricultural productivity, and the long-term consequences of encroachment onto productive farmland, this harm must be given significant weight in any soundness assessment.

7. Conclusion: The Allocation is Unsound and Should Be Removed

Each of the five grounds set out above constitutes, individually, a serious soundness objection to the Eckington Way allocation. Taken together, they form an overwhelming evidential case that this allocation fails the tests of soundness required under the NPPF.

To summarise, the allocation:

- Is proposed in an area where the Council's own monitoring confirmed illegal NO₂ levels for four consecutive years, where monitoring was then inexplicably discontinued, and where no current air quality data exists;
- Is proposed on a road network that the Council's own transport evidence confirms is operating at 101–118% of capacity, with no funded mitigation scheme in existence;
- Has lost its primary public transport justification. The Barrow Hill Line reopening was cancelled in July 2024, with no replacement scheme identified;
- Is proposed on a site where two Red List breeding bird species, Skylark and Greenfinch, have been confirmed nesting, without any ecological survey ever having been conducted; and
- Involves the permanent loss of Grade 2 Best and Most Versatile agricultural land, without adequate demonstration that lower-quality alternatives have been exhausted.

This is not a case where concerns can be resolved through planning conditions or mitigation measures. The cumulative failures identified here go to the fundamental viability, legality and sustainability of the allocation itself. The site should be removed from the Sheffield Local Plan entirely until and unless the Council can demonstrate:

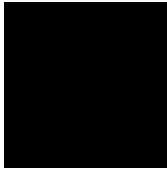
- Compliance with air quality law, based on reinstated and current monitoring data;
- A funded and deliverable highway mitigation scheme;
- A credible and funded public transport improvement programme;
- Completion of comprehensive ecological surveys, including breeding bird surveys over multiple seasons for both confirmed Red List species; and
- A sequential assessment demonstrating that all available brownfield and lower-grade agricultural land alternatives have been fully explored.

The residents of Sheffield South East, the ward councillors, and the constituency MP have consistently and clearly opposed this allocation on exactly these grounds. This objection respectfully calls upon Sheffield City Council to acknowledge the weight of its own evidence and to remove the Eckington Way employment allocation from the Sheffield Local Plan.

Submitted by:

Paul Taylor





29th April 26

REF5.0178

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

From [REDACTED]
Date Wed 2026-04-29 6:39 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[REDACTED]

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

Dear Strategic Planning Team,

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

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

I therefore set out below my objections to specific modifications.

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

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

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

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

This represents a substantial proportion of housing delivery being dependent on

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

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

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

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

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

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

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

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

commitment to secure transport improvements proportionate to development scale and impact, supported by planning obligations and the Infrastructure Delivery Plan. This is particularly important for the S12 area, where transport is a significant concern in relation to the scale of development proposed. The Sheffield Local Plan identifies approximately 1,600 new homes across S12, which will inevitably generate a substantial increase in traffic movements and place additional pressure on an already constrained local road network. However, due to the dispersed spatial distribution of these allocations, there is currently no clear or coordinated transport strategy demonstrating how the cumulative impact of these developments will be mitigated. The plan does not provide sufficient detail regarding required junction improvements, public transport capacity, pedestrian and cycling infrastructure, or wider highway mitigation measures necessary to support this level of growth. Without clear and deliverable transport commitments, there is a risk that the cumulative traffic impacts will

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

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

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

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

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

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

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

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

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

fail should the reality be reflected.

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

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

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

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

The development of 45900 would create a single, continuous cross-boundary block of development that would clearly conflict with several of the Green Belt purposes set out in national policy: they would fail to check the unrestricted sprawl of the existing

built-up area, erode the separation between Sheffield and North East Derbyshire, and constitute significant countryside encroachment. The two developments would effectively double the size of the Charnock estate with no planned proportionate infrastructure to support this rapid growth.

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

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

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

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

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

I appreciate the opportunity to comment and urge the Inspectors and the Council to

reconsider the Main Modifications to ensure the Local Plan remains robust, equitable, and fit for purpose.

Yours sincerely

Paul Bridges

REF5.0179

comments on local plan consultation

From [REDACTED]
Date Wed 2026-04-29 7:17 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Strategic Planning Team,

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

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

I therefore set out below my objections to specific modifications.

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

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

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

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

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

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

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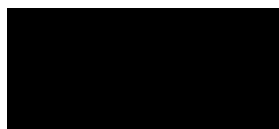
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I therefore urge the Inspectors to require further modifications, including the removal or reassessment of SS19, to ensure the Plan is sound

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,

Rosalyn and David Platts





REF5.0180

comments on local plan consultation

From [REDACTED]
Date Wed 2026-04-29 7:22 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.

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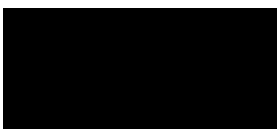
This fails to align with paragraph 42 of the NPPF which states that 'the more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits'.

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

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

Yours sincerely,

Andrea Platts





REF5.0181

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

From [REDACTED]
Date Wed 2026-04-29 9:13 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,

Alice Wright

REF5.0182

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

From [REDACTED]
Date Wed 2026-04-29 10:01 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Strategic Planning Team,

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

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

I therefore set out below my objections to specific modifications.

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

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

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

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

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

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

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

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

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

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

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

greenbelt will have 'some negative effects in terms of mental health and wellbeing' on surrounding communities.

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

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

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

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

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

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

The Council's own housing needs evidence shows that the majority of housing need in Sheffield is for affordable housing. However, the Plan relies on sites such as SS19 that are only likely to deliver around 30% affordable housing, alongside uncertain windfall

development. This fails to align with the identified need and undermines the justification for releasing Green Belt land. As a result, the approach is not justified, not reliable, and does not provide confidence that the promised affordable housing will be delivered.

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

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

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

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

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

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

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

The modifications also fail to consider the impact of North East Derbyshire District Council’s Local Plan, particularly its proposed allocation immediately adjacent to SS19 (site reference

45900), which could deliver a further 348 homes alongside shops or a care facility. It is significant that the landowner, promoter and developer for site 45900 are the same as for SS19, yet NEDDC has assessed 45900 as unsuitable for development due to the same constraints repeatedly raised in relation to SS19.

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

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

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

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

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

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

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

Yours sincerely,

Hannah Wright



REF5.0183

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

From [REDACTED]
Date Thu 2026-04-30 7:49 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Strategic Planning Team & Inspectorate,

I am writing to object to the proposed Main Modifications to the Sheffield Local Plan, and particularly those that relate to Green Belt Development and more specifically those that are related to the impact of 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,

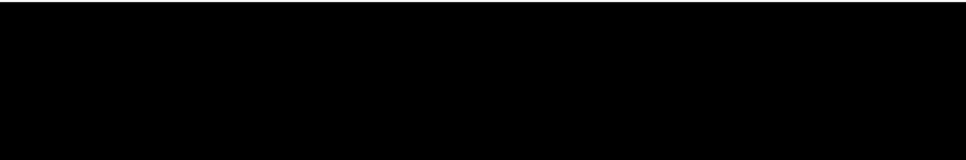
Jonathan Hobson

REF5.0184

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

From [REDACTED]
Date Thu 2026-04-30 7:49 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email



Dear Strategic Planning Team & Inspectorate,

I am writing to object to the proposed Main Modifications to the Sheffield Local Plan, and particularly those that relate to Green Belt Development and more specifically those that are related to the impact of 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.

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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,

Kate Hobson

REF5.0185

Sheffield Plan Ref - MM411 (SES30) - Bramley / Beaver Hill Fields and SES29 Handsworth Hall Farm

From [REDACTED]
Date Thu 2026-04-30 9:04 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Council,

I would like to object based on the fact that it is unsound to release these sites from the Greenbelt. I want these sites to be removed from the plan and kept as Greenbelt for the good of this community.

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

A. Failure to Comply with the Environmental Assessment Regulations

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

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

Inspectors must ensure the plan complies with these regulations.

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

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

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

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

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

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

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

2. Soundness Arguments (required by the NPPF)

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

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

None of the tests of soundness have been met.

A. Not Positively Prepared

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

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

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

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

C. Not Effective (Cannot Be Delivered)

The site has constraints.

- The allocation is not deliverable within the plan period (to 2039).
- Infrastructure (roads, drainage, schools, GP capacity) is insufficient and no costed funded mitigation is identified.

- This fails the NPPF requirement for plans to be “effective and deliverable”.

D. Not Consistent with National Policy

The NPPF contains strong protections for:

- Green Belt
- Biodiversity net gain
- Local green spaces
- Flood risk areas
- Valued landscapes
- Recreational land

These all apply to the S13 site.

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

3. Site-Specific Characteristics - Legal Arguments

A. Biodiversity and Wildlife Law

The site contains protected species and habitats:

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

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

The land will have flood and surface water issues:

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

C. Loss of Open Space (NPPF para 99)

The NPPF states:

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

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

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

4. Procedural Argument: The law is clear:

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

- The allocation is unlawful because it goes beyond what Main Modifications are allowed to do.

- It should instead trigger a new Regulation 18/19 consultation.

I look forward to your response.


Nicola Bates

S13 resident

REF5.0186

Sheffield Plan - Main Modifications

From [REDACTED]
Date Thu 2026-04-30 9:14 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

 1 attachment (248 KB)
HBF Sheffield MM - April 2026.pdf;

External email

Dear Sir/Madam,

Please find attached the response of the Home Builders Federation (HBF) to the above consultation.

It would be greatly appreciated if you could confirm receipt of this response.

Kind regards,

Chris



Strategic Planning
Howden House
Union Street
Sheffield
S1 2SH

SheffieldPlan@sheffield.gov.uk

30/04/2026

Dear Sir/ Madam

Sheffield Plan – Main Modifications Consultation

1. Thank you for consulting with the Home Builders Federation (HBF) on the Sheffield Plan Main Modifications.
2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales, as well as a large proportion of newly built affordable housing.
3. We set out our comments on the Main Modifications below.

Part 1: Vision, Spatial Strategy, Sub Area Policies and Site Allocations

MM7 – Objectives for a Green City

4. The HBF considers that for this Main Modification to be sound and compliant with national policy, the text should be amended from:

“Maintain a Green Belt to assist in urban regeneration by encouraging the recycling of derelict and other land.”

5. To:

“Maintain Green Belt land which performs strongly against the Green Belt purposes contained in the NPPF, so as to assist in urban regeneration by encouraging the recycling of derelict and other land.”

[Redacted signature block]

[Redacted signature block]

MM10 – Policy SP1

6. The HBF does not support the insertion of a stepped trajectory within Policy SP1 and considers it is unsound as it is ineffective, not planned positively and is inconsistent with national policy.
7. The notion of a stepped trajectory is allowed for in the PPG (Reference ID: 68-021-20190722), however it is important to emphasise that in allowing for a stepped trajectory, it states that

“...strategic policy-makers should ensure there is not continued delay in meeting identified development needs.”
8. The HBF has concerns that in putting in a stepped trajectory the Council will be delaying meeting identified development needs (which conflicts with the PPG). This is because the Council at present is not meeting its need. This is shown by its current Housing Delivery Test score (80%), its lack of a five year housing land supply and the fact that since the beginning of the plan period (2022) it has not delivered the number of homes required.
9. A stepped trajectory would therefore clearly exacerbate this situation and compound the problem of the Council not currently meeting its need. This is fundamentally at odds with the Government’s instruction to ‘significantly boost’ the supply of new homes.
10. Even if a stepped trajectory were to be introduced, the HBF has been clear in previous representations that the step should be brought forward so it takes place sooner, in order to mitigate the lack of supply in the early part of the plan period. We have also voiced concerns previously regarding how realistic the step up in housing delivery will be, which will involve moving from 1,780 dwellings per annum in 2030/31 to 2,750 dwellings per annum in 2031/32 and have suggested that a gradual increase in the housing requirement would be more realistic and deliverable. We consider that, as a minimum, such changes are made to the plan to ensure Policy SP1 is effective.

MM83 – Broad Locations for Growth

11. The HBF supports the deletion of this as we agree that references to Broad Locations for Growth are unjustified.

MM87 – Policy H1

12. Whilst the HBF is supportive of lowering the target for homes delivered on previously developed land from 85% to 80% (criterion b), we maintain our position that this criterion should be

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approach which is ineffective and inconsistent with national policy. We therefore consider that the policy should be based on the percentage of units rather than floorspace.

29. Notwithstanding this, even if the Inspectors were to disagree with this position, the Glossary to the Local Plan seeks to define GIFA, but this is done on a very broad and imprecise basis and it is unclear how this would relate to mixed-use developments in particular. This is likely to result in disagreements between applicants and the Council in how the GIFA of a development is measured. Instead, we would advocate that reference is made to an industry standard such as the RICS Code of Measuring Practice which provides a much more detailed breakdown of how GIFA is calculated.

MM129 – Policy NC4

30. The proposed changes to this policy deletes the following wording:

“Exceptions to the required gradients for driveways to wheelchair accessible and adaptable dwellings may be made where it can be demonstrated that the topography of the site makes this impractical.”

31. The HBF objects to the deletion of this paragraph as without this wording, the policy is unclear on what should happen if site gradients make M4(2) and M4(3) dwellings undeliverable. It therefore undermines the effectiveness of the policy. This sentence therefore needs restating. Furthermore, this deleted sentence should be expanded to also allow instances where viability issues would prevent the delivery of such dwellings on a site.

MM186 – Policy GS6

32. The HBF generally supports the amended wording to Policy GS6 as proposed by MM186. It is important however that the policy is flexible enough so as to make compliance with Biodiversity Net Gain (BNG) requirements as easy as possible for all applicants.
33. Whilst Policy GS6 correctly identifies the need to adhere to the BNG hierarchy (criterion b), criterion (c) then appears to repeat much of what is actually contained in the hierarchy as well as stating that priority will be given to land within the South Yorkshire Local Nature Recovery Strategy (SYLNRS) area. However, it is then not clear where the SYLNRS area sits in the hierarchy. Additional text is needed to explain this and ensure the policy is effective.
34. Paragraph 8.31 has also been inserted which states that further BNG supplementary planning documents/guidance might be undertaken. The HBF would strongly oppose this. The statutory framework for BNG is comprehensive and clear and does not require any further explanation.

Indeed, laying on more guidance is likely to confuse rather than clarify matters. Paragraph 8.31 should therefore be deleted.

MM188 – Policy GS7

35. The changes proposed to Policy GS7 in the form of MM188 are broadly supported, however to ensure the approach to street trees adheres to national policy, wording needs to be added which references footnote 52 of the NPPF. This makes clear that where it is justified and there are compelling reasons, street trees may not always need to be provided.

MM217 – Policy DC1

36. The HBF notes the changes to Policy DC1 through MM217. Whilst these changes are understood, the additional text proposed does not address instances where viability issues may mean such planning obligations referenced in the policy cannot be delivered. This makes the policy ineffective.
37. As such, the policy needs additional wording that facilitates the submission of site-specific viability assessments in these cases. Informed negotiations in terms of provision and phasing of infrastructure can then be undertaken.

MM221 – Monitoring

38. The HBF supports the removal of Monitoring in this section of the Sheffield Plan and relocating it into a separate Annex (Annex C).

Annex C – Sheffield Plan Monitoring Framework

39. The Monitoring Framework in Annex C is much more comprehensive than that originally proposed at the Regulation 19 stage. Nevertheless, the HBF considers that it still does not clearly outline the measures that would be undertaken if policies do not achieve their outcomes. The Council has identified what would constitute a policy not achieving what is required (identified as ‘Trigger’) but then this is not followed with the corrective action that would be undertaken. Consequently, an ‘Actions’ column needs adding to ensure that the Plan as a whole can be effectively implemented.

Future Engagement

40. The HBF trusts that the Council and the Inspectors will find these comments useful as the Sheffield Plan progresses. We would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

[Redacted signature block]

[Redacted signature block]

41. The HBF would like to be kept informed of all forthcoming consultations upon the Sheffield Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours faithfully,

[Redacted signature]

Chris Martin BSc(Econ) MSc MA MRTPI

[Redacted contact details]

[Redacted footer text]

[Redacted footer text]

REF5.0187

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

From [REDACTED]**Date** Thu 2026-04-30 12:02 PM**To** SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

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

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

MM10 MM11 MM90-MM93 - The Sheffield Local Plan relies on a significant windfall allowance of 7,475 homes out of a total supply of 39,159 homes (MM90), equating to approximately 19% of the overall housing supply. This represents a substantial proportion of housing delivery being dependent on unallocated and uncertain sites, which by definition are not plan-led. The Plan does not provide sufficient evidence to demonstrate that this level of windfall delivery will be realised in a consistent, sustainable, or timely manner. **MM92** defines that the housing trajectory shows that the Sheffield Local Plan delivers only 298 dwellings above the identified requirement of 38,020 homes. This represents a margin of less than 1% across the entire plan period, providing no meaningful flexibility to account for delays, non-delivery, viability issues, or infrastructure constraints. This is particularly concerning given the Plan provides only a very small margin above its housing requirement, meaning any shortfall in windfall delivery would result in the Plan failing to meet its targets.

MM18- With SS19 being one of the first green belt sites to be developed, and a year 7 place deficit until 2028/29, this does not provide the assurance that there will be adequate educational provision in the S12 area. Paragraph 3.2.3 of the Integrated Impact Assessment Report Addendum: Modifications Consultation (document here) states that, if a city centre school was built, it would be unlikely to be ready in time for the forecast peak deficit in places, weakening this mitigation further still. The moderation also fails to address how the educational needs of a post 16 student population, which continues to rise and will peak in 2028/29, will be met. This is a particular concern for S12 as the population will increase significantly with the planned development and south-east Sheffield has no post-16 provision. There are also significant concerns about primary school provision across the S12 area, with Charnock Primary Academy (the primary school closest to SS19) already being oversubscribed by 33% (Sheffield City Council, 2025). The plan proposes the development of approximately 1,600 new homes in this part of the city (Draft Sheffield Local Plan Interactive Map and Sheffield Additional Site Allocations), growth that would ordinarily require a new primary school if delivered as a single strategic development. However the plan fails to demonstrate that essential education infrastructure can support the proposed level of growth.

MM19- The wording "include consideration" is non-binding and fails to secure delivery. The

modification does not commit to a new facility, which is not allocated a site, and does not address the spatial mismatch between need and provision. S12, which lies outside the Central Sub-Area, is expected to absorb significant residential growth with just one extra consultation room being allocated to the area in the plan, despite having pockets of high deprivation and subsequent poor health outcomes. MM19 does not demonstrate how healthcare needs arising from this growth will be met, and fails the NPPF tests of effectiveness and justification, and risks exacerbating health inequalities unless strengthened. Concerns around the impact of development on health and wellbeing are supported by the revised IIA (which can be found here) which states that 'some new site allocations may reduce the overall amenity experienced by nearby residents. Although the Plan already includes measures to minimise these effects, it is unlikely that all remaining negative impacts can be fully avoided'. Paragraph 5.2.2 of this document also acknowledges that removal of greenbelt will have 'some negative effects in terms of mental health and wellbeing' on surrounding communities. MM20 -The phrase "wherever practicable" is unacceptably ambiguous in a policy area that is critical to sustainable development and infrastructure delivery. It provides no commitment or assurance that transport improvements will be secured. The modification fails the NPPF tests of effectiveness and clarity, and risks undermining modal shift, accessibility, and safety objectives. It also weakens the plan's ability to secure equitable outcomes across sub-areas. The wording must be replaced with a firm commitment to secure transport improvements proportionate to development scale and impact, supported by planning obligations and the Infrastructure Delivery Plan. This is particularly important for the S12 area, where transport is a significant concern in relation to the scale of development proposed. The Sheffield Local Plan identifies approximately 1,600 new homes across S12, which will inevitably generate a substantial increase in traffic movements and place additional pressure on an already constrained local road network. However, due to the dispersed spatial distribution of these allocations, there is currently no clear or coordinated transport strategy demonstrating how the cumulative impact of these developments will be mitigated. The plan does not provide sufficient detail regarding required junction improvements, public transport capacity, pedestrian and cycling infrastructure, or wider highway mitigation measures necessary to support this level of growth. Without clear and deliverable transport commitments, there is a risk that the cumulative traffic impacts will significantly worsen congestion, reduce road safety, and undermine the sustainability of the area. Paragraph 5.6.5. If the IIA states that site SS19 'benefits from its proximity to the blue tram route and a high-frequency bus corridor', however, the lived experience of current residents is that this route is already under pressure during peak times and buses are infrequent and unreliable. As such, it is unclear how the proposed level of housing growth in S12 can be accommodated without substantial and clearly defined transport infrastructure improvements. MM127 & MM128- The Plan suggests that Green Belt windfall sites could deliver up to 50% affordable housing, but there is no evidence this is achievable in practice. In fact, the Council's own evidence shows that sites like SS19 are only likely to deliver around 30% affordable housing. This creates a clear gap between what the policy promises and what can actually be delivered. The Plan also relies on "windfall" sites to deliver higher levels of affordable housing. However, windfall sites are uncertain and cannot be guaranteed to come forward, or to deliver the infrastructure and affordable housing needed. This means the Plan is relying on outcomes that may never happen, while still allowing development on Green Belt land. The Council's own housing needs evidence shows that the majority of housing need in Sheffield is for affordable housing. However, the Plan relies on sites such as SS19 that are only likely to deliver around 30% affordable housing, alongside uncertain windfall development. This fails to align with the identified need and undermines the justification for releasing Green Belt land. As a result, the approach is not justified, not reliable, and does not provide confidence that the promised affordable housing will be delivered. MM224 MM 227- These modifications recognise that some sites have constraints (such as flood risk, access issues, and environmental limits), but there is no evidence of any level of recalculation to ascertain the reduction in buildable area and therefore reduction of the number of homes expected from those sites. This raises concerns that the Plan is overestimating how many homes can actually be delivered. If parts of sites cannot be built on, the total housing numbers should be reduced accordingly. In the case of sites such as SES13, the Plan acknowledges the need for buffers but does not reassess how this affects the number of homes the site can deliver. More worryingly, SS19 is not included in these modifications even with significant constraints, including flood risk and the ecological corridor as well as additional buffers for the brook and hedgerows, this creates a risk that the Plan is relying on housing numbers that are not realistic, which undermines confidence that the overall housing target can be met & with such a low "buffer" of housing above the target, the plan could fail should the reality be reflected. As a result, the Plan is not reliable, the modifications are not consistent across sites and does not provide a clear or accurate picture of what can actually be delivered. MM429 (SS19) - The S12 Green Belt Action Group has submitted two previous consultation statements for MM429 (SS19) which highlight significant site constraints including flood risk and the ecological corridor, the need to protect the robin brook and its impact on the Moss Valley SSSI along with access constraints and hedgerow buffers but SS19 is not referenced in MM224 or MM227, which should require recalculation of housing impact across site allocations. This omission is concerning. If

SS19's constraints are serious enough to warrant modification text, they should also trigger a reassessment of its contribution to housing supply. The failure to cross-reference SS19 in the impact recalculation undermines the credibility of the housing trajectory and suggests that constraint-driven reductions are not being applied consistently. This raises soundness concerns under NPPF paragraph 36(b) and (c): the plan may not be justified or effective if constrained sites are retained without transparent recalibration. The inconsistency also risks undermining spatial equity, as less constrained sites may be overburdened to compensate for undeliverable allocations like SS19. It is also apparent that even with amended brook buffers and hedgerow buffers, the appropriate buffering has not been removed from the developable area, it is believed this will have an impact on the number of houses that are deliverable on the site and therefore impact the viability of the site. The modifications also fail to consider the impact of North East Derbyshire District Council's Local Plan, particularly its proposed allocation immediately adjacent to SS19 (site reference 45900), which could deliver a further 348 homes alongside shops or a care facility. It is significant that the landowner, promoter and developer for site 45900 are the same as for SS19, yet NEDDC has assessed 45900 as unsuitable for development due to the same constraints repeatedly raised in relation to SS19. The development of 45900 would create a single, continuous cross-boundary block of development that would clearly conflict with several of the Green Belt purposes set out in national policy: they would fail to check the unrestricted sprawl of the existing built-up area, erode the separation between Sheffield and North East Derbyshire, and constitute significant countryside encroachment. The two developments would effectively double the size of the Charnock estate with no planned proportionate infrastructure to support this rapid growth. There appears to have been no meaningful collaboration with Sheffield City Council to assess the combined effects of these neighbouring proposals. The absence of any cross-boundary assessment represents a clear gap in the evidence base and undermines the justification for retaining SS19 in the plan. This raises serious concerns regarding compliance with the Duty to Cooperate and further undermines the soundness of the Plan. In conclusion, the main modifications do not adequately address the constraints and concerns highlighted in previous consultations, or during the public hearings. For the plan to be sound, it depends on modifications being made, however those proposed are vague and lack the detail to demonstrate that they are specific, credible, deliverable or proportionate to the scale of the development in the area. This fails to align with paragraph 42 of the NPPF which states that 'the more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits'. I therefore urge the Inspectors to require further modifications, including the removal or reassessment of SS19, to ensure the Plan is sound I appreciate the opportunity to comment and urge the Inspectors and the Council to reconsider the Main Modifications to ensure the Local Plan remains robust, equitable, and fit for purpose. Yours sincerely, Albert Whysall

REF5.0188

Objection to Main Modification MM411 – SES30

From Karen Hobson [REDACTED]
Date Thu 2026-04-30 12:55 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

 1 attachment (149 KB)

Objection to Main Modification MM411 – SES30.pdf;

External email

Please find attached my objection letter.

Regards
Karen Hobson

OBJECTION TO MAIN MODIFICATION MM411 (SES30)

1. Introduction

This representation objects to Main Modification MM411 on the basis that the proposed allocation of SES30 is unlawful and unsound. This submission is advanced on strict legal and procedural grounds only. The identified defects are matters of law which cannot lawfully be remedied through planning balance, mitigation, or the exercise of discretion.

The objection is founded on the following defects:

- Failure to comply with the Environmental Assessment of Plans and Programmes Regulations 2004 and Directive 2001/42/EC
- Failure to lawfully identify and assess reasonable alternatives
- Reliance on a methodologically defective site selection and aggregation process
- Failure to apply the Sequential Test in accordance with national policy
- Absence of a demonstrably objective and robust evidence base

Each defect independently renders the allocation unsound and the modification unlawful.

2. Legal Framework

The Local Plan must comply with Directive 2001/42/EC and the Environmental Assessment of Plans and Programmes Regulations 2004, in particular Regulation 12 and Schedule 2, which require the identification, description, and evaluation of reasonable alternatives and their likely significant environmental effects.

The Plan must also be consistent with national policy requiring a sequential, risk-based approach to site selection and allocation, supported by a robust and objective evidence base, including National Planning Policy Framework paragraphs 161–162 governing application of the Sequential Test.

3. Ground 1 – Unlawful Sustainability Appraisal (Failure to Assess Reasonable Alternatives)

3.1 Pre-filtering of alternatives

The Integrated Impact Assessment Update Report confirms that sites not considered 'sustainably located' were excluded from being treated as reasonable alternatives (paragraph 2.3.6). This approach is unlawful. The SEA regime requires that reasonable alternatives are first identified and then assessed, not excluded through prior policy assumptions.

This pre-filtering approach:

- Prevents lawful comparison between alternatives
- Embeds the preferred spatial strategy at the assessment stage
- Removes genuine alternatives from transparent scrutiny

3.2 Absence of lawful comparative assessment

Rather than undertaking an independent, plan-level comparison of reasonable alternatives, the IIA relies on the outputs of the site selection methodology (paragraph 2.3.5). There is no consistent, like-for-like appraisal across alternatives and no transparent reasoning explaining why rejected sites perform materially worse.

This approach is inconsistent with established case law, including *Heard v Broadland District Council* [2012] and *Save Historic Newmarket Ltd v Forest Heath District Council* [2011], which confirm that reasonable alternatives must be assessed in their own right and not filtered out through embedded policy preferences.

Conclusion on Ground 1: The Sustainability Appraisal is procedurally defective and unlawful.

4. Ground 2 – Defective Site Selection through Artificial Aggregation (SES30)

4.1 Inconsistent assessment framework

Technical evidence assesses sites S02502 and S03020 as separate entities, including distinct Level 2 Strategic Flood Risk Assessments (May 2025). Notwithstanding this, they are combined and allocated as a single composite site, SES30.

4.2 Legal defect

Environmental effects are assessed at the individual site level, while planning judgment and allocation occur at the aggregated level. This mismatch masks specific constraints, dilutes impacts (including flood risk), and prevents lawful comparison both between alternatives and within the Sustainability Appraisal.

4.3 Effect on legality

An assessment cannot lawfully support a decision where the unit of environmental assessment differs from the unit of plan-making and allocation. The aggregation of SES30 therefore represents a methodologically defective construct and undermines the legal adequacy of the appraisal process.

Conclusion on Ground 2: SES30 is unsound and unsupported by lawful assessment.

5. Ground 3 – Failure of the Sequential Test

5.1 Policy requirement

National policy requires development to be directed to areas of lowest flood risk, supported by a transparent and evidence-based Sequential Test (NPPF paragraphs 161–162; Sequential Test Report paragraphs 1.3–1.4).

5.2 Dependency on alternatives assessment

The Sequential Test depends upon the lawful identification and comparison of reasonable alternatives. Where alternatives have been unlawfully pre-filtered and artificially aggregated, the Sequential Test cannot operate as intended.

5.3 Failure in this case

In this case:

- Alternatives have been unlawfully excluded through pre-filtering
- Sites have been aggregated inconsistently with the evidence base

A Sequential Test undertaken on an unlawfully constrained and distorted pool of sites is itself unlawful.

Conclusion on Ground 3: The Sequential Test has not been lawfully applied.

6. Ground 4 – Absence of an Objective and Robust Evidence Base

6.1 Structural conflict

Sheffield City Council acts as both landowner and Local Planning Authority in relation to SES30 (Statement of Common Ground paragraph 1.2). While landownership alone is not unlawful, this structural position requires clear and demonstrable safeguards to ensure objectivity and independence in evidence preparation and site selection.

6.2 Absence of safeguards

No evidence is provided of independent verification, external peer review, or procedural separation sufficient to ensure that the evidence base informing SES30 is demonstrably objective. Evidence is generated, interpreted, and relied upon within the same institutional framework promoting the allocation.

6.3 Effect on soundness

In the absence of demonstrable safeguards, the evidence base lacks the transparency and objectivity required by national policy. This is a matter of soundness, undermining confidence in the justification and credibility of the allocation.

Conclusion on Ground 4: SES30 is not supported by a robust and objective evidence base.

7. Overall Conclusion

The proposed allocation of SES30 is undermined by:

- An unlawful Sustainability Appraisal
- A defective and inconsistent site selection methodology
- Failure to lawfully apply the Sequential Test
- An evidence base lacking demonstrable objectivity

Each defect independently renders Main Modification MM411 unsound. Taken cumulatively, they demonstrate a fundamentally flawed plan-making process.

8. Requested Outcome

The Inspector is respectfully requested to:

- Find Main Modification MM411 unsound
- Recommend the removal of SES30 from the Plan

REF5.0189

Sheffield Plan - Main Modifications Consultation - SE Response (Ref: SP/20/00003726)

From [REDACTED]
Date Thu 2026-04-30 4:27 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>
Cc [REDACTED]

 1 attachment (129 KB)
20260430 00003726 C CC SE Response - Sheffield Local Plan Main Modifications.pdf;

External email

Hello,

Thank you for consulting Sport England please find attached Sport England comments to the Main Modifications Submission.

Kind Regards,

Chris Carroll [REDACTED]

[REDACTED]

Sheffield City Council

Letter by email only

Date: 30th April 2026

Dear Sir/Madam,

Sheffield Plan – Main Modifications Submission

Thank you for consulting Sport England on the above document.

We tried to use the online submission to provide our comments but it was requiring the resubmission of information for each comment that we wanted to make which was taking up our limited resources.

We have therefore provided our comments in this letter and the attached table.

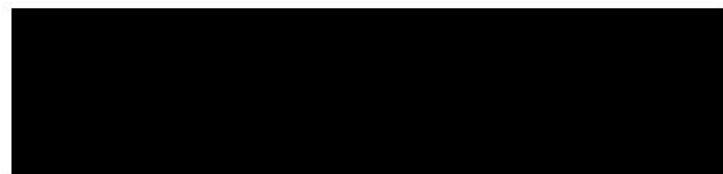
Once again, thank you for consulting Sport England and we hope that you consider the comments made below.

Yours sincerely,



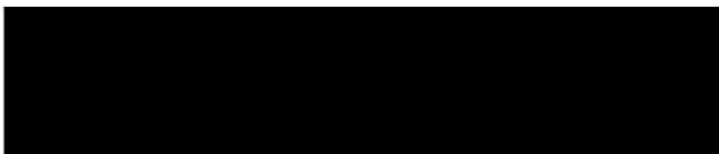
Christopher Carroll

Planning Manager

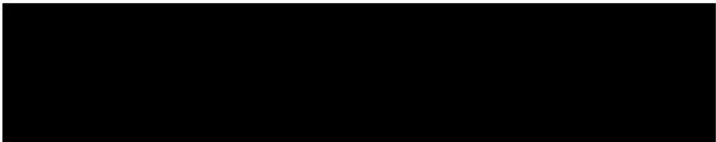


Sport England Detailed Representations

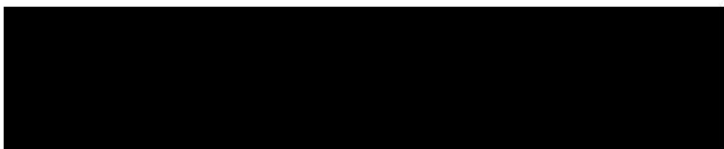
Main Modification Reference	Proposed Main Modification	Council's reason for change	Sport England Comment
MM103	Amendments to Policy BGI and the supporting text (paragraphs 5.20-5.24) – the revised text (including an amended version of Map 17)	To improve effectiveness and clarity, including in relation to the status of the Local Nature Recovery Strategy and the role of historic parks, gardens and cemeteries as part of the city's blue and green infrastructure	<p>Sport England welcomes the amendment; however, it notes that Policy BGI does not explicitly recognise spaces for outdoor sport as part of the blue and green infrastructure network, despite these being a key resource in supporting sport and physical activity, health and wellbeing. For example, water bodies may be used by sailing or rowing clubs, and playing fields are used by organised sports teams.</p> <p>While the policy refers to “<i>outdoor recreation</i>”, this term is generally associated with informal leisure activity, whereas sport typically involves structured and often competitive activity that requires dedicated facilities. To reflect this distinction more clearly, Sport England recommends that the word “sport” is explicitly included within the first paragraph of the policy.</p>
MM147	Amendments to Policy NC15 and supporting text - Creating Open Space in Residential Developments. In particular -	To ensure the Policy is effective	The Council is currently preparing a new Playing Pitch Strategy and a Sports Built Facilities Strategy, which will supersede the Playing Pitch Strategy adopted in 2022. To ensure that paragraph 4.52



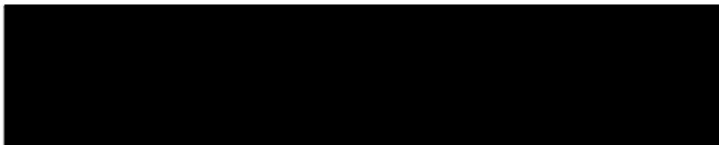
	<p>Paragraph 4.52 The Council published a citywide Playing Pitch Strategy in 2022 which will be used to inform decisions on planning applications affecting playing pitches; such planning applications will also need to ensure that there is no conflict between adjacent uses such as housing and playing fields by incorporating appropriate mitigation measures, as required.</p>		<p>remains future-proofed, Sport England recommends that the first sentence is amended to refer more generally to the Council's strategies for sport (including both outdoor and indoor provision). That said, as the proposed amendment is in relation to planning applications affecting playing fields it is more appropriate for Policy GS1A in the protection of playing field sites rather than Policy NC15.</p> <p>Policy NC15 and its supporting text should instead focus on the provision of sporting infrastructure, including and with specific reference to playing fields, to address the sporting needs generated by new development proposals.</p> <p>Sport England considers that Policy NC15 does not fully recognise that new development, particularly residential development, will generate additional demand for sporting provision. Existing facilities, including both outdoor and indoor provision, may not have sufficient capacity to accommodate this demand without exacerbating existing or forecast deficiencies. As such, new development should be required to contribute towards meeting the sports demand it generates, either through the provision of appropriate on-site facilities and/or through off-</p>
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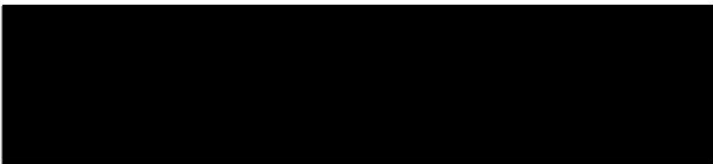
			<p>site contributions to increase capacity, quality, or accessibility at existing sports facilities.</p> <p>Sport England has developed nationally recognised tools, including the Sports Facilities Calculator and the Playing Pitch Calculator, which can be used alongside an up-to-date evidence base to identify the demand generated by new housing development and to determine the most appropriate means of addressing that demand.</p> <p>It is therefore recommended that the second paragraph of Policy NC15 makes explicit reference to the need to provide for sports provision arising from new development. The supporting text should clearly explain how contributions towards new and existing sports facilities, including playing fields and indoor sports facilities, will be secured. This should have regard to the outputs of Sport England’s calculators and be informed by the Council’s Playing Pitch Strategy and Sports Built Facilities Strategy (and any subsequent updates).</p>
MM178	Amendments to Policy GS1	To ensure consistency with national planning policy an improve effectiveness	Given playing fields are not mentioned in this policy, Sport England are unclear as to the inclusion of the following text under ‘Further information’ there is the following text:



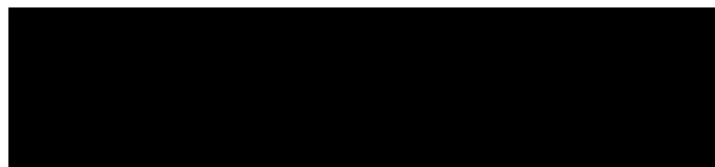
			<p><i>“The Sheffield Playing Pitch Strategy should be referred to for evidence relating to recommendations for playing pitch requirements and their provision.”</i></p>
MM179	New Policy GS1A – Development affecting Sports and Recreational Buildings and Land	To ensure consistency with national planning policy and improve effectiveness	<p>Sport England welcomes the inclusion of a specific policy to safeguard the city’s sports and recreational facilities. Given that the Council is preparing a new Playing Pitch Strategy and a Sports Built Facilities Strategy, Sport England advises that the Local Plan is future-proofed by including wording such as “and any subsequent updates, as well as other relevant strategies,” within the second sentence of paragraph 8.11. Reference to these forthcoming strategies should also be included within the ‘Further information’ section.</p> <p>Policy GS1A should play an important role in safeguarding existing sports and recreational buildings and land from loss or prejudicial impacts. However, it does not address the additional demand for sporting provision that will arise as a result of new development, particularly residential development, nor is this issue currently addressed within Policy NC15.</p> <p>Sport England therefore considers that Policies NC15</p>



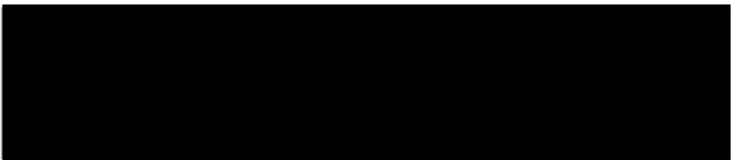
			<p>and DC1 should be strengthened to explicitly address development-generated demand for sporting provision, including both indoor and outdoor facilities, and to clarify the mechanisms through which this demand will be addressed. This would complement the safeguarding role of Policy GS1A and help ensure that new development contributes appropriately towards meeting the sporting needs of future residents</p> <p>Sport England are unclear as to the following wording within Policy GS1A: <i>“The development of new, built leisure facilities that are ancillary to the outdoor sports use will be acceptable where it complies with Policy GS1 or Policy GS2, as applicable.”</i> The policy refers to other policies without identifying which criteria are relevant or how proposals for ancillary built leisure facilities should be assessed. As currently worded, the policy does not clearly explain how it should be applied, which could lead to different interpretations by different decision makers. Sport England therefore recommends that Policy GS1A and/or its supporting text is amended to clearly define what constitutes ancillary development and to specify the relevant requirements of Policies GS1 and GS2 that should be</p>
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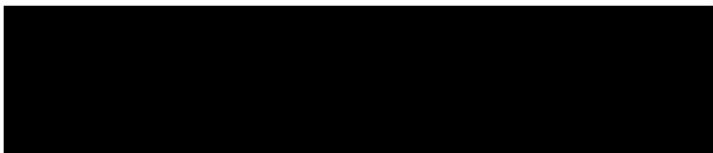
			satisfied, to ensure clarity and effectiveness.
MM217	<p>Amendments to Policy DC1 - "Under 'Other Developer Contributions' amend the first paragraph to read:</p> <p>"Developers of housing schemes comprising 10 or more new homes will be required to contribute towards education facilities, health facilities and/or open space (in accordance with Policy NC15) where needs are not being met through the CIL or other funded capital programmes and where further mitigation is necessary to make the development acceptable in planning terms. Developers of specialist housing designated for older people will not be required to contribute to towards education facilities or children's play facilities."</p>	For effectiveness	<p>In light of the Council's preparation of a robust and up-to-date evidence base, Sport England considers that it would be a missed opportunity if deficiencies identified in the Playing Pitch Strategy and Sports Built Facilities Strategy were not addressed through the Local Plan. Sport England therefore recommends that the first sentence of this policy is amended to include a specific reference to "sports facilities, including playing fields" before the words "(in accordance with Policy NC15)", to ensure that the policy clearly captures the need to respond to identified deficiencies in sporting provision.</p>



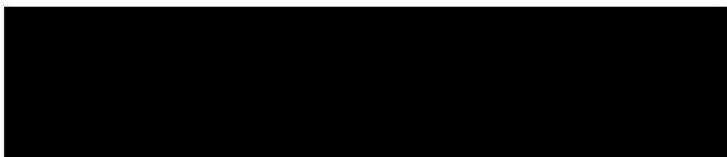
MM368	<p>Amendments to Site Allocation Policy ES25. Insert condition on development: "• The loss of sports pitch provision resulting from the proposed development should be replaced by equivalent or better provision in terms of quantity and quality in a suitable location taking account of the evidence set out in the Playing Pitch Strategy and priority projects for sports provision in the city."</p>	<p>To comply with the National Planning Policy Framework in relation to sports pitches</p>	<p>For the reasons set out in our letter dated 7 January 2026 ("Sport England comments on EXAM I23B"), Sport England considers that it has not been demonstrated that a development proposal in accordance with paragraph 99 of the NPPF (Sept 2023) / paragraph 103 of the NPPF (Dec 2023) could be satisfactorily achieved on this site. As such, at this stage, Sport England does not consider site allocation to be deliverable.</p> <p>Notwithstanding the above, and in the event that the allocation is progressed, Sport England strongly recommends that the condition is amended so that the term "<i>sports pitches</i>" is replaced with "playing field." The sports pitches are not currently laid out on the site and, as drafted, the condition would not require the replacement of the entire playing field, including land that is ancillary and necessary to support the pitches (such as safety run off areas, spectator space, access and car parking, etc). This would not be consistent with the requirements of paragraph 99 of the NPPF (Sept 2023) / paragraph 103 of the NPPF (Dec 2023).</p> <p>In addition, Sport England considers that the words "<i>and priority projects for sports provision in the city</i>"</p>
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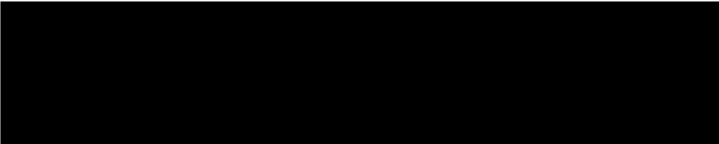
			<p>should be deleted from the condition, as these are likely to focus on qualitative improvements only and would not necessarily secure equivalent replacement provision in quantitative terms. Furthermore, the current Playing Pitch Strategy identifies existing shortfalls in pitch provision, which could be exacerbated by the development of this site, thereby reinforcing the need for additional provision.</p>
MM412	Amendments to Site Allocation Policy SS01. "Insert • The loss of sports pitch	To comply with the National Planning Policy Framework in	For the reasons set out in our letter dated 7 January 2026 (" Sport England comments on EXAM I23B "), Sport England considers that it has not been



	<p>provision resulting from the proposed development should be replaced by equivalent or better provision in terms of quantity and quality in a suitable location taking account of the evidence set out in the Playing Pitch Strategy and priority projects for sports provision in the city."</p>	<p>relation to sports pitches</p>	<p>demonstrated that a development proposal in accordance with paragraph 99 of the NPPF (Sept 2023) / paragraph 103 of the NPPF (Dec 2023) could be satisfactorily achieved on this site. As such, at this stage, Sport England does not consider site allocation to be deliverable.</p> <p>Notwithstanding the above, and in the event that the allocation is progressed, Sport England strongly recommends that the condition is amended so that the term "<i>sports pitches</i>" is replaced with "playing field." The sports pitches are not currently laid out on the site and, as drafted, the condition would not require the replacement of the entire playing field, including land that is ancillary and necessary to support the pitches (such as safety run off areas, spectator space, access and car parking, etc). This would not be consistent with the requirements of paragraph 99 of the NPPF (Sept 2023) / paragraph 103 of the NPPF (Dec 2023).</p> <p>In addition, Sport England considers that the words "<i>and priority projects for sports provision in the city</i>" should be deleted from the condition, as these are likely to focus on qualitative improvements only and would not necessarily secure equivalent</p>
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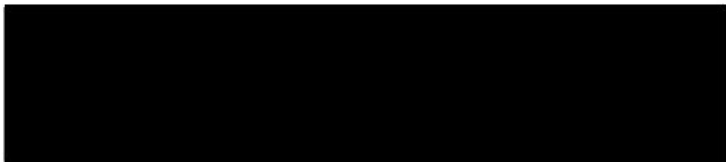
			replacement provision in quantitative terms. Furthermore, the current Playing Pitch Strategy identifies existing shortfalls in pitch provision, which could be exacerbated by the development of this site, thereby reinforcing the need for additional provision.
MM427	Amendments to Site Allocation Policy SS18. "Add condition on development: "• The playing field in the eastern part of the site is to be retained."	To safeguard the playing field	Sport England welcome the inclusion of this condition.
MM468	Amend definition "'Community facilities': providing for a community's day-to-day needs or which further the community's social wellbeing or social, recreational, cultural and sporting interests. It includes local shops, meeting places, sports venues , cultural buildings, public houses, places of worship and other local services which enhance the sustainability of communities and residential	To ensure the list of facilities is correct.	Sport England notes the deletion. Sport England also notes that there is still reference to " <i>sporting interests</i> ." Therefore, to make the policy more effective and avoid ambiguity for the decision maker, the definition should make clear that development proposals affecting sports facilities, including playing fields are to be assessed under Policy GS1A and not Policy NC13.



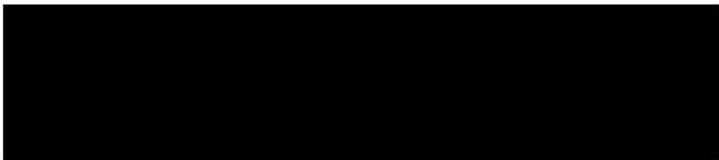
	environments such as; community centres, youth clubs, libraries, information and advice centres, lecture theatres, drop in centres, crèches and nurseries, training centres and toilets."		
MM469	Insert a new definition: "Greenspace' – this includes 'open space' as defined in the National Planning Policy Framework, as well as other public and private areas that are valued for their visual amenity; for the contribution they make to protecting important views or vistas; as connecting spaces between designated wildlife sites; as environmental buffers between conflicting uses; or for local food production (allotments, community gardens and urban farms)." Relevant policies: BG1; GS1	To take account of changes to Policies BG1 GS1	Sport England notes the new definition. However, there appears to be no mention of playing field or outdoor sport. To make the policy more effective and avoid ambiguity for the decision maker, it is advised that a playing field definition is included in the Glossary. Additionally, the proposed Greenspace definition should be clarified to make clear that 'Where development proposals affect playing fields or outdoor sports facilities, including playing fields, Policy GS1A will apply.'
MM471	Insert a new definition: "Local	To ensure effective	Sport England notes the new definition and advises



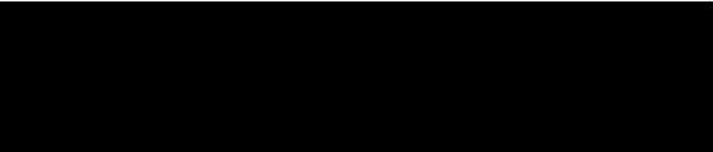
	<p>Green Space: this land use designation is set out in the NPPF, paragraphs 101-103, and allows communities to identify and protect green areas of particular importance to them. The designation should only be used where the green space is:</p> <ul style="list-style-type: none"> • in reasonably close proximity to the community it serves; • demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and • local in character and is not an extensive tract of land <p>Policies for managing development within a Local Green Space should be consistent with those for Green Belts." Relevant policies: "SA5, SA6,</p>	<p>policy implementation</p>	<p>that the second bullet point appropriately clarifies that Local Green Space designations should be applied selectively and in full accordance with paragraph 99 of the NPPF (Sept 2023) / paragraph 103 of the NPPF (Dec 2023), and only where such designation would not conflict with the Playing Pitch Strategy or compromise the future enhancement, reconfiguration or replacement of sports provision.</p>
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	BG1, GS1"		
MM221	Amendments to Chapter 12 – “Amend paragraph 12.1 and insert new paragraph 12.3: 12.1 The Council will use a series of indicators to monitor progress against key policies in each of the chapters the Plan’s strategic objectives. The frequency that the data would be reported is specified for each indicator. 12.3 Full details of the indicators, targets and triggers for action are set out in Annex C. After paragraph 12.3, delete all the bullet points listing the indicators and replace with the new Annex C Monitoring Framework – this is available at the end of this schedule. Amend Part 1, paragraphs 1.6 to 1.8”	For effectiveness	Sport England notes the amendments and considers that, in relation to the monitoring of Policies GS1, GS1A and NC15, it would be beneficial to include sport-related indicators relating to the quality, quantity and capacity of sports facilities. This would help ensure that the effectiveness of the Plan in supporting sport and physical activity can be measured over time, with reference to the Council’s Playing Pitch Strategy and Sports Built Facilities Strategy.
MM342; MM348; MM456	For Site Allocation Policies NES13; NES28 and SD11 –“Add the following condition on development: • A Sports and	To address impacts on sports and urban green space.	Sport England notes and welcomes the amendments.



	<p>Urban Green Space Impact Assessment is required that identifies any detrimental impacts to adjacent sports/recreational facilities or to the development proposal, assessing the impacts and suggesting appropriate mitigation where necessary."</p>		
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REF5.0190

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

From [REDACTED]
Date Thu 2026-04-30 4:28 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,
Samantha Green

REF5.0191

White Lane housing plans S12.

From [REDACTED]
Date Thu 2026-04-30 4:36 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

 1 attachment (116 KB)
FINAL_EMAIL_TEMPLATE[32824063].pdf;

External email

[REDACTED]

Please find attached my objection to the plan for white Lane.

Kerr Atkins
Sent from [Outlook for Android](#)

Please copy and paste the below into a blank email.

To: sheffieldplan@sheffield.gov.uk

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

Dear Strategic Planning Team,

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

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Yours sincerely,

[Your Name]

REF5.0193

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

From [REDACTED]
Date Thu 2026-04-30 5:25 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

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

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,
Christopher White

Sent from [Outlook for Android](#)

REF5.0194

BUILDING ON OUR GREEN BELTS

From [REDACTED]
Date Thu 2026-04-30 6:49 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

To: sheffieldplan@sheffield.gov.uk

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

Dear Strategic Planning Team,

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

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

I therefore set out below my objections to specific modifications.

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

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

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

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

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

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

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

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

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

MM19- The wording "include consideration" is non-binding and fails to secure delivery. The modification does not commit to a new facility, which is not allocated a site, and does not address the spatial mismatch between need and provision. S12, which lies outside the Central Sub-Area, is expected to absorb significant residential growth with just one extra consultation room being

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

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

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

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

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

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

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

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

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undermining spatial equity, as less constrained sites may be overburdened to compensate for undeliverable allocations like SS19.

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

The modifications also fail to consider the impact of North East Derbyshire District

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

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

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

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

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

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

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

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

Yours sincerely,

MR & MRS BAILEY

Sent via BT Email App

REF5.0195

Response to the Sheffield Plan Main modifications re SES29 and SES30 (Handsworth).

From [REDACTED]
Date Thu 2026-04-30 8:47 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>
Cc [REDACTED]

The establishment of the public hearings into the Local Plan gave the public the opportunity to put their point of view in person to the Planning Inspectors and Council Officers. It gave the local community a glimmer of hope that they might be listened to. This was in stark contrast to the minimalist approach adopted by the Council planners to consulting with those who would be affected by the developments.

The considerable public participation in the hearings , was only made possible by residents making sure that as far as possible, everyone was aware of the intention to build on most of the greenbelt in Handsworth.

The evidence given at the Hearings was based in FACT and presented in a professional manner after extensive research by professional planners, hired at considerable expense to the Group (Save S13 Greenbelt-The Sapphire McCarthy Campaign).

The outcome of these Hearings, as expressed in the Major Modifications Paper, offers the people of Southeast Sheffield absolutely nothing. Their well-argued submissions have simply been dismissed without comment or explanation.

As a community that has seen its greenfield sites disappear one by one, due to SCC's policy of "The green belt is sacred", the least my constituents deserve was an explanation as to why their solid representations were summarily dismissed. The Local Plan, as it stands, is still unfair, as the Leader of SCC has repeatedly said.

The Major Modifications document reinforces the feeling that the views and life chances of those living in Southwest Sheffield are more valued than those of the residents of the Southeast.

The brutal ignoring of the Group's views is in total contradiction to the public commitment to honour the recommendations of the Lowcock Report given by two former Council Leaders, a former Lord Mayor, the current Chief Executive and current Council Leader.

What follows is a list of some of the remaining outstanding issues not dealt with by the Hearings and subsequent document:

The protection offered to the ancient woodland is ineffective and puts it at risk.

The presentation by SCC Highways officers on how the necessary road layout changes would be handled was bordering on insulting as it was so devoid of detail.

The response to the increase in water run-off caused by building in a location already prone to flooding-ie Beaver Hill Road, was the use of SUDS. When asked how many, and location, and how many houses this would remove from the total, the planning officers could not answer.

You would think that given the wildlife value of SES29, you would expect that an ecological survey would be top of the list of things to do. To date, it has still not taken place.

The idea that High Hazels Park could be considered as a mitigation to the loss of these two sites is simply ludicrous due to the distance from the existing sites, and the topography of the park which would test a fit person, let alone anyone with any sort of mobility issues.

Yours Sincerely

Councillor Mick Rooney
Elected Member, (Labour and Cooperative), Woodhouse Ward

REF5.0196

Objection to the Main Modifications to the Sheffield Local Plan - Site SS19

From [REDACTED]
Date Thu 2026-04-30 8:55 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.

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

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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,
Caroline Dunn

Sent from my iPhone

REF5.0197

Objection to the Proposed Mai. modifications to the Sheffield Local Plan - Site SS19

From [REDACTED]
Date Thu 2026-04-30 8:57 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,

Jamie Stafford

Sent from [Outlook for iOS](#)

REF5.0198

Modification reference MM411

From [REDACTED]
Date Thu 2026-04-30 10:06 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

I am writing this email to state this thos site should be removed from the plan and kept as Green belt

Having lived in this area for over 50 years and suffering with mental health I have spent many times walking these fields and ancient woods

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

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

Inspectors must ensure the plan complies with these regulations.

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

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

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

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

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

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

- The consultation is ****procedurally unfair**** because updated documents were released after the consultation began.

- This may breach **Regulation 18 and 19** consultation requirements.

2. Soundness Arguments (required by the NPPF)

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

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

None of the tests of soundness have been met.

A. Not Positively Prepared

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

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

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

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

C. Not Effective (Cannot Be Delivered)

The site has constraints.

- The allocation is **not deliverable** within the plan period (to 2039).
- Infrastructure (roads, drainage, schools, GP capacity) is insufficient and no costed funded mitigation is identified.

- This fails the NPPF requirement for plans to be "effective and deliverable".

D. Not Consistent with National Policy

The NPPF contains strong protections for:

- **Green Belt**
- **Biodiversity net gain**
- **Local green spaces**
- **Flood risk areas**
- **Valued landscapes**
- **Recreational land**

These all apply to the S13 site.

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

**3. Site-Specific Characteristics - Legal Arguments

A. Biodiversity and Wildlife Law

The site contains protected species and habitats:

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

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

The land will have flood and surface water issues:

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

C. Loss of Open Space (NPPF para 99)

The NPPF states:

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

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

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

4. Procedural Argument: The law is clear:

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

- The allocation is **unlawful** because it goes beyond what Main Modifications are allowed to do.

- It should instead trigger a new Regulation 18/19 consultation.

Regards

Cheryl Pursehouse
Local resident

REF5.0199

Objections to the planning of all S35 green belt and CH03

From [REDACTED]
Date Fri 2026-05-01 9:18 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

To Sheffield City Council,

The plan to build on Sheffield's green belt is a huge mistake, the council is not listening to the people of Sheffield that live in these areas and will be affected, **WHY ?**

Resident's are concerned for their health, if this plan goes ahead the impact will be horrendous, we have had over a year of worries regarding how this will effect the homes and area that we live in, this has caused stress and mental health issues forced upon us by this council, our concerns and objections appear to have been overlooked, even with evidence of its negativity, going against the Governments own guidance of the NFPP, only to develop green belt under extreme circumstance! **Why are we, NOT using all the brown field sights and developing land first that is sat waiting to be developed. There are hundreds of empty industrial units across Sheffield and South Yorkshire.** What is the extreme circumstance, when none of the reasons given by the council add up, and we also want answers as to why there is a clear unfair distribution of development in S35, that will also cause Chapeltown, Ecclesfield and Grenoside to be as one with Sheffield city.

Pollution

The area of S35 is above the acceptable level of pollution from vehicles , Warren lane CH03, is especially high from the M1, we will have light pollution, noise and dust pollution, this will impact on individuals health, this will be devastating for anyone with respiratory problems or asthma, is the council going to be accountable for the rise in this health issue.

Flooding

S35 is an area with a history of flooding, if we take away the fields that absorb the rain water, where will it go, the gardens joining the field CH03, Warren lane flood now, the field holds the water and it becomes a bog when the rain is heavy, the rain water runs into the brook down stream, this has happened in the past causing floods in Chapeltown center, Is the council going to be held accountable for the damaged caused by this, and allowing the green belt to be developed on.

Contamination

People in the area are concerned, it is well known that many areas in the plan have contamination in the ground, when disturbed what dust will be spread around the homes where we live, the same contaminated soil will wash down to our streams and surrounding area, we as residents have been given no information regarding this very disturbing matter, we would like to see evidence that the tests have been done deep enough to test for this, again I ask is the council going to be accountable for allowing this, that could have a significant impact on our health.

Infrastructure

We do not have the correct infrastructure to accommodate all the development in the area of S35, Warren lane is a lane, the impact from other industrial sights in the area already have a huge impact on this lane, the roads are grid locked at rush hour and a five minute journey through Chapeltown can be anything up to forty five minutes, an issue on the M1 and this can mean hours, we demand to see correct evidence of traffic monitoring for this area, people that live here know the problems it has,

how can the area cope with 3,400 new homes in the area, there isn't a train station car park, we can not get into the Doctors or Dentist, A&E and our hospitals are at breaking point, and our only secondary school is full,

The council is also ignoring the facts that the housing figures that we have been given do not add up to what this area needs.

Wildlife

We have an abundance of wildlife in the area, CH03 we see Deer, badgers, foxes, bats, dormice, field mice, owls hundreds of species of birds, many protected like the Curlew, this field is a corridor for the wildlife to move into the ancient bluebell woods, there will be no where for these animals to go, Why would the council not want to stand by its constituents, and save this beautiful area and what it has to offer in its natural state, Sheffield City Council, you are changing the face of our Green City.

Net Zero

The Council and Government constantly talk about this, destroying nature and our Green belt is going against Net Zero, this is land that supports nature, eco systems, biodiversity, its the very thing that gives us life, it also feeds us, taking away farming land to concrete over it,

Why are we not building appropriately in the correct places, Old buildings derelict for years, Council houses stood empty, hundreds of brown field sights, developing these would improve Sheffield immensely.

Heritage and History

People in this area are proud of its history, being part of Wentworth, its walks through ancient woodland, agricultural land, the Trans Pennine trail, mining, deer farms, the reminder of the old train tracks and station, its working history, the making of the Sherman tanks, and so many more, the council is changing all of this in its plan to develop it, less than five mile up the road at Hoyland Barnsley, the devastating impact on our countryside can be seen in full,

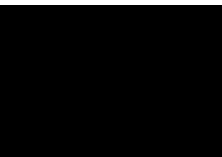
Huge warehouses, much of it empty, land bulldozed over and still not built on, is this really how we want to see our area, if the plan goes ahead the area will be engulfed with houses and industry, as it will be in every area that we turn and this is not how I wish to live.

Property value

The value of my property could fall by as much as 20%, why should my loss be the council and developers gain, I have lived in my home for [REDACTED] who is going to compensate me ? I worked hard as a single Mother for what I have, it feels like its being stolen from me, and its wrong.

Regards,

Debra Coleman



REF5.0200

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

From [REDACTED]
Date Fri 2026-05-01 9:19 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Strategic Planning Team,

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

Note Parcels B and C have been removed from the plan on the basis that they are described as "particularly attractive" and that they "make a strong contribution to the character and setting of the local area," with development likely to cause "significant landscape/visual harm." I believe this applies equally to Parcel A. This land is home to endangered species and includes acid grassland, mature trees, historic hedgerows, and drystone walls dating back to the before the 1770s. In both ecological and landscape terms, Parcel A is just as if not more so "particularly attractive" and makes an equally strong contribution to the character of the area as the other parcels. Its development would likewise result in "significant landscape/visual harm."

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

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

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

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

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

and habitat-related consequences.

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

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

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

Yours faithfully,

Rebecca Doncaster



01/05/2026