

Sheffield Plan Main Modifications

Responses – by email

Reference numbers REF5.0501 to REF5.0514

Reference Number	Respondent Name	Organisation
REF5.0501	Emily Cadman	Individual
REF5.0502	Michelle Rowett	Individual
REF5.0503	Jim Bolsoiver	Individual
REF5.0504	Nick Hague	Individual
REF5.0505	Asha Dube	Individual
REF5.0506	Michael Rowley	Individual
REF5.0507	Kim Rowley	Individual
REF5.0508	Jennie	Individual
REF5.0509	Hemantha Wijeyesekera	Individual
REF5.0510	Ann Birks	Individual
REF5.0511		Individual
REF5.0512	Matthew Wilcock	Environment Agency
REF5.0513	Sarah Reynolds	Individual
REF5.0514	Sharon Allen	Individual

REF5.0501

Latest consultation plan

From [REDACTED]
Date Tue 2026-05-05 10:00 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

To whom it may concern,

I am still finding the negatives outweigh the positives in building on Greenbelt sites across Sheffield, I mean, the S35 area should I say. I live on [REDACTED] and would see the 'outstanding' warehouse(s) on the Greenbelt land every day I wake up. I travel a lot for work including through Chapeltown and the state of the roads are in such a state of disrepair, I can only imagine what the roads will be like with further traffic, larger vehicles including HGV's and the constant pollution of stand-still traffic, which is already present every single day in Chapeltown around prominent times. Warren Lane is not suitable for HGV's or additional traffic, and although the roads have been repaired last year, they have now gone back to how they were before being repaired, so imagine what they will be like with HGV's which are already unsuitable for the road and would exceed the weight limit.

The wildlife present on the Greenbelt land on Warren Lane and other Greenbelt sites in S35 include deer, owls, several birds and bats, which would mean their habitats are destroyed and they will be killed in the destruction needed to create warehouses and houses.

As mentioned I travel a lot for work. The amount of empty warehouses I see in the local area and the amount of 'To Let' signs are staggering. I am very deeply concerned that the warehouse(s) that will be built on Warren Lane will become another empty, derelict warehouse.

The land on Warren Lane is not suitable to be built on, with the land being filled with unknown substances and mainly clay. The zonal approach is also not clear, with the work being classed as light industry, but this doesn't explain for the potential to create further pollution (even though it's already high levels), the noise pollution with the warehouse potentially being 24/7 and the extra created traffic issues, as well as Warren Lane being a one-way system towards the end, which is constantly ignored as it is, meaning further strain on local authorities and the police for the inevitable accidents.

The Greenbelt on Warren Lane was meant to act as a buffer zone and to PREVENT the urban sprawl, what is building on it going to achieve? The total opposite.

The noise pollution from the M1 is already prominent, with industry being built on the Greenbelt, noise pollution and dust will increase.

The Tankersley rail tunnel runs underneath Warren Lane, and must be kept free from development, unless National Rail approve this. There is also mines underneath Warren Lane with the conditions of the mines not properly documented, so it is unknown what condition they are in.

The site also formed part of ancient woodland, home to deer and ancient species of plant have been found on the site, all of which hasn't been examined or looked into properly by yourselves, which is poor practice. Development resulting in the loss or deterioration of irreplaceable habitats should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists. Is the warehouse(s) exceptional reasons? No.

In conclusion, the plan to build on the Greenbelt sites is still baffling and there is still a lot of work to do before any decision can be made, before losing the trust of the residents on Warren Lane and in S35.

I thought the council and planners would have learned from the mass tree felling, perhaps not.


Regards,

Emily Cadman

REF5.0502

NWS 31

From [REDACTED]
Date Tue 2026-05-05 10:18 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

 1 attachment (31 KB)
Objection Letter.docx;

External email

Please find attached my objection letter for NWS 31

Regards,
Michelle Rowett

Sent from [Outlook for iOS](#)

Sheffield Plan-Consultation on Main Modifications

To: Strategic Planning

5th Floor, Howden House,

Sheffield, S1 2SH

Email: sheffieldplan@sheffield.gov.uk

Dear Planning Inspector,

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

My personal objection.

I have lived in my house [REDACTED] for 35 years, I moved her in 1990. The house was previously owned by my grandparents, who had lived in it since it was built in 1952. Myself and my brother were born here. Out of my [REDACTED] I have lived in the village for 41 of them. I am very sentimental about Wharnccliffe Side. I went to the old school; my children went to the Nursery and Primary School [REDACTED]

I do not want to see you build more houses on the site known as NWS31, its where my family have enjoyed walking for years and I want it to continue to be there for the future. I learnt all about wild flowers in those fields and spent a lot of time in the stream growing up. The field is my happy place and full of memories for me and my family, the bird song is uplifting and variety of wild life is amazing. It makes me smile.

It was bad enough when the fields were built on 30 years ago, I am a NIMBY.

Access to the fields would be via Dixon Drive and Don Avenue the older properties (council built), most of these do not have off road parking making it difficult for cars to get when double parked let alone heavy construction vehicles. If the properties suggested were to be built the properties would have at least 2 cars at least and estimated 150-200 extra cars traveling on these already obstructed roads. I do not see how you would be able to rectify this and surely that number of houses and cars requires a second access point. It is already difficult to exit Brightholmlee Lane on to the Main Road at busy times and this will only get worse with the existing builds at Stocksbridge, Deepcar and Oughtibridge Valley.

When there is a road closure locally it is chaos, due to the lack of infrastructure we constantly get power cuts, and public transport is rubbish. Building NWS31 would only make these issues worse.

The field is very boggy in places and a few years ago there were trees planted in various places to prevent flooding does that not say to you that you already know it that the land is wet and to cover it with houses and tarmac would escalate this issue. Building the newer houses has caused my garden to be very wet during the winter months and we have had to put in drainage to offset this.

I feel that the houses that would be built would be built on the site would-be high-end properties to reap in high council tax bracket income. My son and daughter have had to buy properties further away as they can not even afford to first time buy in the area.

I may be waffling but I can not put into words how catastrophic it would be for you to release this land for building on would be. It means so much to me and the people of Wharnccliffe Side. I do not understand or pretend to understand all the coded Main Modification and I know a lot of people will give up at the first hurdle of writing to you like I nearly did. Basically I do not want you to allow building on NWS31. As stated below proper assessments need to be done and planners actually come and look at the site and walk round and discuss why you think it is suitable and let us have our say and point out to you why it is not suitable.

Introduction

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

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

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

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

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

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

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

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

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

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

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

The Council acknowledges that:

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

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

They also say that:

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

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

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

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

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

Evidence

- Proximity of Compensatory Space – The distance to remaining Green Belt will be significantly increased for many residents, particularly those who live in the central area of the village (Don

Ave, Dixon Drive) and in many cases will exceed the recommended 300m. For many, including those with Protected Characteristics, this will be too far to walk.

- Any Open Space on site is proposed to be on the south side of the site, mainly in the form of an ecological buffer, which is once again too far to walk for some residents. The area is much less accessible for all, has uneven ground, is overgrown and mostly within the flood plain, so is often inaccessible due to waterlogged ground. The experience of this space is very different to the rest of the field, being dark, under the trees and with limited view. It is the remote area of the field that is not typically visited.
- Proposed compensation at Glen Howe Park – The area is steep, with woodland, and little view. The flood mitigation trees and ponds reduce available Open Space. These are remote areas that are less safe for the public. Increased walking distance for many residents.
- Proposed compensation at 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.

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

REQUIRED CHANGE

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

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

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

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

Evidence

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

- Local road infrastructure may need improvements to cope with heavy plant machinery and extra traffic.

Changes required

Main Modifications need to specify that:

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

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

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

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

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

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

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

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

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

Evidence

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

Changes Required

MMs should state that:

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

2. BNG for watercourse should be calculated.

3. Mitigations should be put into place for all identified Protected Species and their habitats including suitable buffers and light restrictions around forage areas and flight paths. This

should apply to all habitats (bat roosts etc.) identified both on site and within close proximity to site.

4. Some areas of open grassland should be retained.

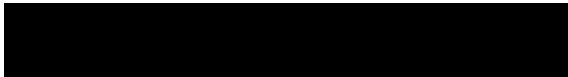
AND

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

I do not think this is sound and legal

Yours Sincerely,

Michelle Rowett



REF5.0503

Main modifications consultation

From [REDACTED]
Date Tue 2026-05-05 11:58 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

I am responding to the above with reference to MM410 (SES29)

1. I do not believe that the site can deliver what the Council claims.

The Council assumes that there is a net developable area of 44.84 hectares (24.84 ha for housing, 20 ha for employment), yet the landowner's own masterplan submitted in the May/June 2025 consultation (examination ref. 1.0633), which takes account of the site's constraints, shows only 34.59 hectares – which is over 10 hectares less. This roughly equates to 23% less available land than the Council assumes.

The Council expects 110 homes to be built each year, but industry research (Lichfield's 'Start to Finish') shows that that rate is normally only achieved on sites of 1,500+ homes with multiple builders working at once.

The overall housing supply in the Plan has a buffer of less than 1% - 298 units.

This matters because if SES29 underdelivers, the Plan fails to meet its own housing requirement. In other words, the Council is overstating what is possible on the site.

2. Mining and contamination considerations

The site has a long history of mining being the location of Handsworth Nunnery colliery where my father worked.

There are numerous underground workings throughout the area including a drift entrance. It is close to a historic landfill, and needs a Coal Mining Risk Assessment. No investigation has been carried to determine if it is safe to build on and there has been no costings provided regarding making the site safe and stable.

The plan to build 870 houses on the site is unsound.

3. Access and infrastructure

Finchwell Road is clearly not suitable for any major increase in traffic and there is no plan given as to how the site will be accessed.

Public footpaths cross the site, an archaeological assessment is needed and ecological buffers need to be considered for nearby wildlife sites.

None of this is funded or committed to.

4. Ecology and biodiversity

Green Belt land cannot be allocated on the strength of ecology evidence that is old, incomplete and only disclosed after the allocation decision had effectively been taken.

SES29 was proposed for allocation in March/April 2025, yet the Baseline Biodiversity Net Gain Assessment used to support its release was written on 11/12/2023 and only made public on 7/10/2025.

That is not timely, transparent, or up-to-date evidence. The document itself points to missing survey work and identifies clear biodiversity value, yet MM410 does not address that deficiency therefore the allocation should not proceed.

5. Conclusion

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

I would like to be notified of the Inspectors' final report and the adoption of the Plan.

Thank you
Jim Bolsoiver

REF5.0504

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

From [REDACTED]
Date Wed 2026-05-06 12:00 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Strategic Planning Team,

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

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

I therefore set out below my objections to specific modifications.

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

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

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

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

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

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

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

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

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

MM20 -The phrase “wherever practicable” is unacceptably ambiguous in a policy area that is critical to sustainable development and infrastructure delivery. It provides no commitment or assurance that transport improvements will be secured. The modification fails the NPPF tests of effectiveness and clarity, and risks undermining modal shift, accessibility, and safety objectives. It also weakens the plan’s ability to secure equitable outcomes across sub-areas. The wording must be replaced with a firm commitment to secure transport improvements proportionate to development scale and impact, supported by planning obligations and the Infrastructure Delivery Plan. This is particularly important for the S12 area, where transport is a significant concern in relation to the scale of development proposed. The Sheffield Local Plan identifies approximately 1,600 new homes across S12, which will inevitably generate a substantial increase in traffic movements and place additional pressure on an already constrained local road network. However, due to the dispersed spatial distribution of these allocations, there is currently no clear or coordinated transport strategy demonstrating how the cumulative impact of these developments will be mitigated. The plan does not provide sufficient detail regarding required junction improvements, public transport capacity, pedestrian and cycling infrastructure, or wider highway mitigation measures necessary to support this level of growth. Without clear and deliverable transport commitments, there is a risk that the cumulative traffic impacts will

significantly worsen congestion, reduce road safety, and undermine the sustainability of the area. Paragraph 5.6.5. If the IIA states that site SS19 ‘benefits from its proximity to the blue tram route and a high-frequency bus corridor’, however,

the lived experience of current residents is that this route is already under pressure during peak times and buses are infrequent and unreliable. As such, it is unclear how the proposed level of housing growth in S12 can be accommodated without substantial and clearly defined transport infrastructure improvements.

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

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

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

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

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

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

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

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

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

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

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

therefore impact the viability of the site.

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

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

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

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

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

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

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

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

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

Yours sincerely,

Nick Hague,

REF5.0505

Local plan - building on the S12 greenbelt

From [REDACTED]
Date Wed 2026-05-06 7:09 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[REDACTED]

To Whom it may Concern,

There should be a red line against building on any green belt land or sites of special scientific interest. The City Centre businesses are having a tough time, so there is an argument for preserving rural businesses, rather than pressurising them by creating urban sprawl. The things that attract people to Sheffield and to stay in Sheffield, are widely linked to the nearby greenbelt and countryside access.

It has been 7 yrs since the Council actually surveyed for brownfield sites, and we all pass urban derelict sites every day that would be more suitable for new builds, and likely result in more affordable homes, with better transport links, which will support Sheffield's local economy much better.....

Once lost, habitats cannot be recovered, and the impact on damage to nature and damage to the human population is well established in other situations. It is definitely not in Sheffield's best interests to build on greenbelt, and Councillors should be taking this into account in their decisions - not just the ease of development for developers/ builders, which mostly results in profits for non-local companies, and no benefits for the Sheffield population....

Asha Dube,
[REDACTED]

REF5.0506

FW: Strategic Planning Team.

From [REDACTED]
Date Wed 2026-05-06 12:19 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

[REDACTED]

Hi,

I believe the below is for you but was sent to our LP inbox instead!

Best wishes,

[REDACTED]

North East Derbyshire District Council

[REDACTED]

From: MICHAEL ROWLEY [REDACTED]
Sent: 29 April 2026 21:44
[REDACTED]
Subject: Strategic Planning Team.

[REDACTED]

Warning External.

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,
Michael Rowley

[BSL Interpretation Service](#)

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REF5.0507

FW: Strategic planning team

From [REDACTED]
Date Wed 2026-05-06 1:31 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

[REDACTED]

Hi again!

Another email I believe was intended for your inbox.

Best wishes,

[REDACTED]

North East Derbyshire District Council

[REDACTED]

From: [REDACTED]
Sent: 29 April 2026 21:56
To: [REDACTED]
Subject: Strategic planning team

[REDACTED]

Warning External.

Dear Strategic Planning Team,

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

I therefore set out below my objections to specific modifications.

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

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

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

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

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

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

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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.

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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,

Kim Rowley

[BSL Interpretation Service](#)

Disclaimer

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REF5.0508

Sheffield Plan - Main Modifications

From [REDACTED]
Date Wed 2026-05-06 9:32 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

Dear Sir / Madam,

Firstly, I apologise that I'm late submitting this objection. I was mistaken with the deadline date. I hope, as a gesture of good will, you'd be so kind as to accept this late submission.

I'll keep my points brief.

1. I fail to see how the previous round of objections could have been fully reviewed and considered by the Planning Inspectors, ahead of the decision to approve the plan's progression to the next stage. Especially, with the Christmas / December holiday falling so soon after the submission deadline.

NES38 - proposed site adjacent to Fox Hill Road
MM352 - the specific document my comments relate to.

2. "In accordance with Policy NC1, the masterplanning of the site must include mitigation measures that address any significant visual and landscape impacts.."
I don't see how it is possible to "mitigate" the impact on views or the landscape. There is no way that a housing estate can be made to look like anything other than that. It will undoubtedly ruin the views. I'd also argue that it isn't possible to mitigate the impact on local wildlife or mitigate the impact on local road congestion, air and noise pollution or strain on local services and infrastructure, such as, public transport and healthcare.
3. This document (MM352) refers to the desire to have additional cycle /pedestrian paths across the site, so as to link the two parcels. Firstly, I'd argue that this is a "want" and not a "need". Secondly, there is already a path across the site and down one side of the site, so I'd argue that these could serve the purpose of connectivity without further destruction affecting the Local Wildlife Site.
4. Following the Locock report, a plaque was recently unveiled by the Council in recognition of campaigners' efforts in preventing the needless destruction of thousands of trees.

Along with, at the time of unveiling the plaque (and throughout this consultation), the reassurance from the Council that lessons have been learned, mistakes won't be repeated and that public trust has been rebuilt. It seems from the Greenbelt proposals and the objections raised to them, that history is repeating itself. I think "trust" is far from having been rebuilt. Actions speak louder than words (and plaques), please reconsider the inclusion of these Greenbelt sites in the Sheffield Plan.

Apologies again for the late submission.

Kind regards,
Jennie

Sent from [Outlook for Android](#)

REF5.0509

HAVE YOU CONSIDERED A MAJOR ERROR IN YOUR PLAN. YOU HAVE SUCCESSFULLY
KILLED THE CITY CENTRE THANKS TO YOUR DOGMATIC GREEN POLICIES?

REF5.0510

There is a plot of land at the side of Pitsmoor Road S3. This used to be full of backtoback houses. Why aren't you using this for new house building?

REF5.0511

Objection to the proposed main modification in the Sheffield local plan-site SS 19

From

[REDACTED]

Date Mon 2026-05-04 10:58 AM

To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

First time sender


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[REDACTED]

REF5.0512

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

From [REDACTED]
Date Thu 2026-05-07 3:25 PM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

 1 attachment (268 KB)
EA Sheffield Main Mods response.pdf;

External email

Dear [REDACTED]

Please find attached the Environment Agency's response to the Sheffield Plan Main Modifications consultation. Please accept my apologies the delay in providing our response. Should you have any questions please contact me.

Kind regards

Matthew Wilcock



From: SheffieldPlan <sheffieldplan@sheffield.gov.uk>
Sent: 23 March 2026 14:51
To: SheffieldPlan <sheffieldplan@sheffield.gov.uk>
Subject: Sheffield Plan – Main Modifications Consultation – notice of extension to consultation period

Dear Consultee

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

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

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

The Main Modifications Consultation

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

We are also consulting on:

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

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

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

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

Document availability

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

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

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

All other supporting documents submitted as part of the examination, and produced during the examination, remain available to be viewed at our main office, Howden House, 1 Union Street, Sheffield S1 2SH and online on the examination website:

<https://www.localplanservices.co.uk/sheffieldplan>

Commenting

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

- Online via the consultation website: <https://haveyoursay.sheffield.gov.uk/>
- On paper representations forms:
 - Scanned and emailed to SheffieldPlan@sheffield.gov.uk or

- Printed and returned by post to Strategic Planning, Howden House, Union Street, Sheffield S1 2SH
- By email to SheffieldPlan@sheffield.gov.uk
- By letter to Strategic Planning, Howden House, Union Street, Sheffield S1 2SH

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

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

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

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

Yours faithfully
Simon Vincent
Strategic Planning Service Manager

Data Protection

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

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

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

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Planning Policy Team
Sheffield City Council

Our ref:
Your ref:

By email to
sheffieldplan@sheffield.gov.uk

Date: 7 May 2026

Dear Team

Consultation on the Sheffield Plan – Main Modifications Consultation

Thank you for your consultation on the proposed Main Modifications for the Sheffield Plan which we received on 2 March 2026.

We have reviewed the Plan and the supporting documents. In general, we have no soundness issues with the proposed modifications, however we do have comments in relation to Policy GS9.

It has been agreed (between the Environment Agency (EA) and Local Planning Authority (LPA)) that the GS9 policy wording means that should a development proposal fail to meet the 'musts' in the "**Flood Risk Principles**" or 'achieve the points' in the "**Flood Risk Management for Development Sites**" sections, the application will result in a policy objection from the both the EA and LPA. On this basis, we are in general support of the policy wording. We do have one area of potential concern and additional points of note.

Potential Concern

- The proposed wording changes to point **o)** have raised potential concerns. The wording proposed creates a route to bypass the fluvial risks by mitigating surface water risks. This policy point wording was agreed in the SoCGv4 to address fluvial risks; the amended version will undermine this policy point with regards to fluvial risks. We recognise the need for flexibility specifically where the risk is purely surface water orientated. We have been in touch with the LPA who have confirmed this wording change was not intended to bypass fluvial concerns. We have agreed alternative wording to ensure fluvial risk is not bypassed and be satisfactory for both fluvial and surface water considerations. We would recommend policy point **o)** is amended to the below wording:

“o) more vulnerable uses, including housing, would be above

ground floor level except (without prejudice to any other sources of Design Flood risk) where it has been demonstrated that any site-specific surface water risk has been effectively mitigated via a site-specific Flood Risk Assessment; and”

Points of Note

Supportive Text

- We note from discussions with the LPA that they would potentially like to include the wording ***“Any activities on or near a main river, flood defence structure or in a flood plain need to comply with the Environmental Permitting (England and Wales) Regulations 2016 – Schedule 25 Part 1 (or future equivalent).”*** into the supportive text of GS9 as an additional modification. We would be supportive of the inclusion of this wording.

GS9 Policy

- We are in support of the addition of the text ***“All development proposals, will be considered against national planning policy and guidance, including (where relevant) application of the Sequential and Exception Tests.”*** to be within the policy itself.
- We support the proposed alteration to point **a)** wording.
- We support the proposed alteration to point **b)** wording
- We support the proposed alteration to point **c)** wording
- We support the proposed alteration to point **d)** wording
- We support the proposed alteration to point **e)** wording
- We support the proposed alteration to point **g)** wording
- We support the proposed alteration to point **i)** wording
- We support the proposed alteration to point **j)** wording
- We support the proposed alteration to point **l)** wording
- We are in support of the wording ***“In addition, when developing a site in an area at risk of a Design Flood, development will be permitted where.”***
- We support the proposed alteration to point **n)** wording

GS9 Definitions

- We have no objection the ***‘Self-contained rooms’*** definition
- We note the ***‘Areas at risk of flooding’*** definition **marginally** differs to the NPPF meaning however we have no objection to the policy specific wording.
- We support the changing of the policy definition for ***‘Design Flood’*** such that it is now in line with the NPPF and PPG wording. However, recognise the LPA may wish to revert to the previous ***‘undefended’*** wording **in specific policy criteria (e.g. e) and o))** for other planning consideration reasons. We would have no objection to this in terms of soundness. **Should this be the case we would recommend the following sentence is added to the end of the definition of Design Flood to provide the needed clarification to ensure the definition is applied to the relevant points for which it is intended:**

“For the purposes of Policy GS9 criteria E and O, probability of river flooding should be based on undefended scenarios”

- We are in support of the '**Flood Zone 3b**' policy definition.
- We are in support of the definition regarding vulnerability classification for this policy.

We trust the above advice is useful. If, in the meantime, I can be of any further assistance, please don't hesitate to contact me or the EA Yorkshire Sustainable Places Team.

Yours sincerely

Matthew Wilcock
Sustainable Places Planning Specialist



REF5.0513

Plan

From [REDACTED]
Date Fri 2026-05-08 8:25 AM
To SheffieldPlan <sheffieldplan@sheffield.gov.uk>

External email

[REDACTED]

I have tried to read the plan.

My objections are to any building on greenfield sites. There are acres of derelict brownfield site within the city that should be developed.

There are many sites near Park Wood Springs which is the largest urban park in Europe I believe.

There is a burnt out former church plot on Vincent Road in Sharrow too.

There will also be lots of current student accommodation to repurpose in the future

I urge you not to put greenfield sites onto the plan

Yours faithfully,

Sarah Reynolds

[REDACTED]

Sent from my iPhone

REF5.0514

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

From [REDACTED]
Date Wed 2026-05-13 2:51 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, SS 19 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 tallies the real if reduced or fewer of housing above the target, the plan could As a result, the Plan is not reliable, the modifications are not consistent across sites and does not provide a clear or accurate picture of what can actually be delivered.

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

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

The modifications also fail to consider the impact of North East Derbyshire District Council's Local

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

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

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

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

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

This fails to align with paragraph 42 of the NPPF which states that 'the more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits'. I therefore urge the Inspectors to require further modifications, including the removal or reassessment of SS19, to ensure the Plan is sound. I appreciate the opportunity to comment and urge the Inspectors and the Council to reconsider the Main Modifications to ensure the Local Plan remains robust, equitable, and fit for purpose.

Yours sincerely,
Mrs Sharon Allen